

**Written Statement regarding Matter 4 Issue 1
of the Stage 1 Examination Hearing Sessions
On behalf of Project Bloom BL Ltd
(Representation ID REP093)**

December 2025

1. Introduction

- 1.1 Our Client, Project Bloom BL Ltd, owns the Bloom Heathrow Business Park ('the site') (also known as New Square or Bedfont Lakes Business Park) at Bedfont Lakes in Feltham, London, as fully set out in our Reg. 19 written representations (hereafter: "R19WR") (ref. REPO93).
- 1.2 Our Client is the freeholder of the Site since 2021, which comprises a business park in existing office use (Class E(g)(i)) with approximately 375,000 square feet (35,000 square metres) of floorspace. The Site is designated as a Key Existing Office Location ('KEOL') within LB Hounslow's adopted and emerging Local Plan, which provides planning policy protection against a loss of the existing office use.
- 1.3 Despite the prime quality of the Site's existing office accommodation and its adopted and emerging KEOL designation, the Site has a prolonged high level of vacancy. Following our Client's ongoing marketing of vacant floorspace for office use, and various attempts to modernise and upgrade facilities to attract occupiers, our Client is exploring the potential for (re)developing the Site to provide a flexible employment scheme (i.e. flexible industrial and logistics) and is engaged with pre-application discussions with both LB Hounslow and the Greater London Authority.
- 1.4 On 28th October 2024, we, on behalf of Project Bloom BL Ltd, submitted R19WR on the Proposed Submission Version Draft Local Plan, which was published in July 2024 and underwent public consultation between 6th September 2024 and 28th October 2024.
- 1.5 At this point in time, for commercial reasons the client did not want anything going on the public record (i.e. the representations) relating to the vacancy issues and the desire to explore an industrial development at the site. Consequently, the representations did not seek a site allocation for such a development or seek to remove the KEOL designation at that time.
- 1.6 Instead, the representations sought policy changes to support (or simplify) a change of use to alternative employment uses at the site. Specifically, representations were made to the following policies:
 - Draft Objective 2 - Promoting Economic Growth and Inward Investment
 - Draft Policy P2 - West of the Borough
 - Draft Policy ED1 - Promoting Employment Growth and Development
 - Draft Policy ED2 -Maintaining The Borough's Employment Land Supply
- 1.7 This Written Statement seeks to demonstrate that our Client's site has the potential to make a significant contribution to LB Hounslow's employment needs if the emerging Local Plan loosens protection of the sites protected (but no longer justified) office use designation and instead allows support for the re-development of the site for alternative employment uses.

- 1.8 Specifically this statement provides supplementary evidence regarding Matter 4 Issue 1 of the Stage 1 Examination Hearing Sessions.
- 1.9 This written statement follows a 'Hounslow Employment Land Analysis' Report, prepared by Turley Economics in November 2025, with the analysis within this set out in response to specific Inspectors Questions within this statement.
- 1.10 The analysis considers the position presented by LB Hounslow within The Hounslow Employment Land Review Update (2024), which forms part of the evidence base for the emerging Local Plan (hereafter referred to as "ELR") and EX09 update to the Inspector, with regards to *occupier demand* i.e. floorspace requirements for office and industrial (including warehousing) before accounting for vacancy rates, losses, permissions and other supply factors. This serves to challenge the starting point of Hounslow's employment land allocations and policy position.
- 1.11 The evidence submitted demonstrates our Client's brownfield site, which does not require land released from the Greenbelt for its delivery, has significant potential to contribute to LB Hounslow's unmet and identified industrial need.
- 1.12 The analysis concludes overall that there is neither the qualitative nor quantitative justification for retaining Bedfont Lakes in office use or it's KEOL designation.

2. Site Background and Context

- 2.1 The Business Park, currently in office use (Class E(g)(i)) (comprising c. 375,000 sqft / c. 35,000 sqm floorspace), currently has a high level of vacancy (which will increase above 80% by Q1-2026) and prolonged lack of market interest despite our Client's significant investment and initiatives undertaken to address this. This lack of occupancy and interest does not reflect the site's substantial potential to make significant local and strategic-level contributions to employment delivery, given its favourable location for wider employment uses (connected to key strategic road infrastructure, and close to Heathrow Airport (and within the Heathrow Opportunity Area)).
- 2.2 The commercial context for the Site is summarised within the ELR and set out within R19WR and therefore not repeated here.
- 2.3 Since Bloom's ownership of the Site and, despite the refurbishment of Building 3 and their significant investment to reposition the Business Park, there has currently been no new lettings. The most recent new letting was to Merck which dates back to May 2019. The only (two) deals to happen during Bloom's ownership were to existing tenants: WDFG downsized, and Lindt took a short-term lease on the ground floor of Building 4 to run alongside their existing leases which expire in January 2026. Lindt has since served notice to terminate and will vacate Bloom on lease expiry, which will increase the vacancy rate to 84%.
- 2.4 For full transparency, it is important to note that Project Bloom BL Ltd have had two Heads of Terms agreed for AFLs of Building 4 to Boeing and First Rate Exchange in 2024 (to note these offers were on the basis of a refurb of common areas and new Cat A finish). These deals were pulled out of on viability grounds as the deals were only for 18,000sqft combined (in the context of 280,000 sqft vacant floorspace) and therefore didn't materially change the viability of continuing office use at the park as a whole as vacancy would still have remained around 70% across the park and Project Bloom BL Ltd didn't want to commit to long term leases/tenants which could hinder the opportunity to repurpose for alternative employment uses.
- 2.5 The lack of market interest and demand for office floorspace at the business park is despite significant effort and investment from Bloom to increase the attractiveness of the park to potential occupiers.

3. Matter 4: Employment, Retail and Other Main Town Centre Uses (including proposed releases of Green Belt and Metropolitan Open Land)

Issue 1: Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to the Borough's economy and employment (including proposed releases of Green Belt)?

Question 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?

Response:

3.1 We have undertaken full analysis of the Evidence Base in relation to jobs growth and the need for employment land/floorspace in the Borough over the Plan period, and the following pertinent points are identified:

- **Economic forecasts** - The Hounslow ELR relies on a single economic forecast, produced by Experian in June 2023. An ELR would typically consider a range of forecasts to identify the most realistic growth scenario for the given location, making adjustments as needed to what are often off-the-shelf baseline forecasts. These would commonly be obtained from different forecasting houses such as Cambridge Econometrics or Oxford Economics, in addition to Experian, or the GLA's own forecasts – due to be updated this autumn – could also be used. Consideration of more than one forecast helps to overcome their basic and inherent limitations, being significantly influenced by the forecasters' views on the national and indeed global economy at the time of their production.
- **Sectoral Allocation to Use Class** - An early step in the ELR, in accordance with PPG and standard methodologies, is allocation of sectors by Standard Industrial Classification (SIC) to use classes. The ELR has applied high level allocations of SIC to use class, as many ELRs do, but this does not factor in the nuances of logistics uses. For example, retail is not commonly captured as a logistics use¹ though we know that many of the larger retailers now operate a logistics arm to meet a consumer delivery requirement. For example, in 2016 John Lewis had 10 national distribution centres².

¹ How a business's operations are captured within SIC is dependent on aspects including whether they report to Companies House as separate trading entities for their different divisions.

² SEGRO (2017) Keep London Working

In 2025, around 17 pence in every retail pound was spent online, estimated to rise to 23 pence in every pound by 2028³. The SIC for 'retail trade' includes supermarkets, clothing retail, e-commerce and online auctions, online women's clothing and online home furnishing retailing⁴. These will all have logistics floorspace requirements which are not taken into account in the ELR methodology.

- **Workforce Jobs Versus Full Time Equivalent** - A fundamental error in the starting point of the ELR calculations is the use of workforce jobs instead of Full Time Equivalent (FTE). The Employment Densities Guide states that 'Employment density refers to the average floorspace (in m²) per full-time equivalent (FTE) member of staff'. Using workforce jobs significantly amplifies the estimated floorspace requirements. This varies by SIC but is broadly equivalent to 20% higher⁵.
- **Treatment of Creative Jobs** - The Government's Modern Industrial Strategy⁶ identifies the Creative Industries as a 'growth driving sector'. Within this, the frontier industries are specified as advertising and marketing; film and TV; video games; and, music, performing and visual arts. Not all activities within these industries will require traditional office space or higher density workshop office space. Some will require larger floorplates at lower employment densities, resulting in a greater floorspace requirement. For example, space requirements could include small studio spaces, theatre, tv and film prop storage⁷ and creative workshop space.

The ELR treats 25% of office jobs as creative media. A density of 20 sqm per employee is applied, acknowledging the light industrial nature of this type of use:

"To account for the much larger proportion of creative media jobs in the latest forecast – up from a quarter to 40% of all office-based jobs, we make allowance for one quarter of all 'office' jobs to come forwarded at workshop densities (the various formats average around 20 sq m / job)"

With 'media activities' and 'professional services' driving the growth in employment within Hounslow's consideration of office uses, the implications of an alternative approach are stark.

Notwithstanding that this ignores that 'up to 40%' could be creative media, if a half of the conservative 'one quarter' creative media jobs are assumed to instead require premises within industrial locations this would increase the number of jobs to be accommodated on industrial sites by 1,300 FTEs. A corresponding

³ Experian (March 2025) Retail Planner Briefing Note 22

⁴ SEGRO (2017) Keep London Working

⁵ Based on comparison of total workforce jobs to total FTE jobs using June 2023 Experian

⁶ UK Government (2025) The UK's Modern Industrial Strategy

⁷ SEGRO (2017) Keep London Working

reduction in the number of jobs requiring space within office locations would also apply.

- **Changing operational floorspace requirements** - The Employment Densities Guide (2015)⁸ provides a range for office floorspace density of 8 - 13 sqm per employee. The Hounslow evidence base has applied 10 sqm⁹, to 75% of office demand (with the remainder being treated as creative space at 20 sqm). This guidance was published in 2015. Since then, the ways in which occupiers use space and the frequency of employee presence has changed.

The British Council of Offices considered the implications of this, taking Covid as well as climate change and Net Zero goals into account. A study from 2022¹⁰ found that utilisation of space had fallen to 40-60% post Covid, in comparison with 80% utilisation pre Covid. Anecdotally we know that utilisation is rising but not to pre Covid levels. A decrease of 20% in utilisation is therefore a reasonable assumption and is corroborated within the ELR (2024) which states that net additional need in office uses '*may simply be absorbed by further homeworking*'.

- 3.2 These factors all demonstrate that LB Hounslow's Evidence Base is not sufficiently up to date taking account of market signals and they imply that the Council's policy to safeguard a large quantum of land allocated for office use, including in historic locations no longer fit for purpose, is somewhat short sighted.

⁸ Homes and Communities Agency (2015) Employment Densities Guide, Third Edition

⁹ This is an appropriate position, and aligns with the BCO report referenced

¹⁰ BCO (2022) BCO Guide to Specification Key Design Criteria Update 2022: A Position Paper

Question 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?

Response

3.3 In response to the first part of Question 2, and as set out in the response to Question 1 above, Turley Economics analysis has found that LB Hounslow’s Employment evidence base is not sufficiently up to date taking account of market signals and they imply that the Council’s policy to safeguard a large quantum of land allocation for office use, including in historic locations no longer fit for purpose, is somewhat short sighted.

3.4 It found that:

- Only one economic growth scenario is considered (Experian, June 2023). Typically a number of scenarios would be considered to identify the most appropriate to the area, adjusting off-the-shelf forecasts as necessary.
- The ELR has used workforce jobs instead of FTE to convert into floorspace. This is not in accordance with the correct application of employment densities as set out in the Employment Densities Guide and will over inflate the estimated employment land requirement.
- The translation of identified creative media jobs into floorspace by use class underestimates industrial demand due to allocation of these entirely within office requirements, despite a recognition that these would require workshop space instead of traditional office, and that this is considered light industrial use.
- If a moderate allowance for homeworking is incorporated then the floorspace demand for office occupiers further decreases.

3.5 The approach above results in 9,000 FTE jobs requiring office locations and 4,500 FTE jobs requiring industrial locations. This is in comparison with the ELR which uses 12,900 workforce jobs for office and 4,000 workforce jobs for industrial.

Table 3.1: Turley – Reprofiled Jobs Position – Change 2020-2041

	Office	Work-space	Office Total	Industrial	Warehouse	Industrial Total
1. FTE jobs	-	-	10,300	500	2,600	3,200
2. Reallocating some creative jobs to industrial	7,700	1,300	9,000	1,800	2,600	4,500

Turley Economics, 2025 Figures are rounded to the nearest 100 and may not appear to sum

1. Converting workforce jobs to FTE with 20% reduction (on comparison of FTE to workforce jobs in 2023 June Experian) ; 2. 50% of creative jobs reallocated to industrial

3.6 Translation of these FTE jobs to *occupier demand* through application of employment densities¹¹ gives an adjusted figure of 82,400 sqm of office floorspace and 278,100 sqm of industrial.

Table 3.2: Turley – Reprofiled Occupier Demand Position (Sqm) 2020-2041

	Office	Workspace	Office Total	Industrial	Warehouse	Industrial Total
1. Application of employment densities to FTE	77,200	51,500	128,700	24,400	202,200	226,600
2. Reallocating some creative jobs to industrial demand	77,200	25,700	103,000	75,900	202,200	278,100
3. Allowing for changing working practices for office employees	61,800	20,600	82,400	75,900	202,200	278,100

Turley Economics, 2025 Figures are rounded to the nearest 100 and may not appear to sum

1. Following conversion of workforce jobs to FTE with 20% reduction (blanket approach based on comparison of FTE to workforce jobs in 2023 June Experian); 2. 50% of creative jobs reallocated to industrial use at 40sqm employment density; 3. 20% lower office requirement based on BCO utilisation figure

3.7 This suggests that occupier demand for office floorspace in Hounslow is over-estimated in the ELR by some 49%. Occupier demand for industrial floorspace is broadly aligned (2% variance). See table overleaf.

¹¹ Homes and Communities Agency (2015) Employment Densities Guide, Third Edition

Table 3.3: Turley - Variation to Hounslow Final Position – Occupier Demand (Sqm) 2020-2041

	Office	Work-space	Office Total	Industrial	Warehouse	Industrial Total
Hounslow - Final Position	96,500	64,400	160,900	30,600	252,700	283,300
Turley - Reprofiled Position	61,800	20,600	82,400	75,900	202,200	278,100
Variance	-34,800	-43,800	-78,500	45,400	50,600	5,200
% Variance	-36%	-68%	-49%	148%	-20%	-2%

ELR Update - Appendix 2 (2024); EX09 (2025); Turley Economics, 2025 Figures are rounded to the nearest 100 and may not appear to sum

- 3.8 This is before accounting for vacancy rates and changes in supply since the start of the plan period. Given that there is currently a lack of market for office and a deficit of supply for industrial (see ELR and EX09) the sensitivity testing indicates a requirement for less office space and broadly the same quantum of industrial space.
- 3.9 This demonstrates that the overall amount of employment land identified by LB Hounslow to be provided in the Plan for industrial floorspace and office floorspace is not justified, and a lower amount of land required for office floorspace should be provided.
- 3.10 Beyond the methodological approaches considered here, LBH’s translation of floorspace requirements into land use allocations is flawed in two key ways:
- There is an assumption that historic office locations remain relevant to the current and future occupier requirements. This is not the case as is evident from the relocation of occupiers of Bedfont Lakes to town centre locations.
 - Safeguarding of office land and floorspace for future, as yet un-evidenced, market demand is at odds with the Council’s ambitions to support economic growth within the borough and across Heathrow Opportunity Area in particular. Supporting the change of use of Bedfont Lakes from office use to industrial / logistics could will support immediate occupier demand and welcome an estimated 660 FTE jobs, £48.3 million in GVA a year (including £32.5 million In LBH) and £1.9 million in annual Business Rates to the borough once operational.
- 3.11 This has significant implications to our Client’s Site as the over provision of land for office use within the Plan does not justify the continued protection of Bedfont Lakes as a KEOL.

Question 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?

Response

- 3.12 Whilst directing office use to these locations is consistent with National Policy, for the reasons set out previously, the Local Plan over provides land needed for office use and there are two key flaws with the approach:
- There is an assumption that historic key office locations remain relevant to the current and future occupier requirements. This is not the case as is evident from the relocation of occupiers of Bedfont Lakes to town centre locations.
 - Safeguarding of office land and floorspace for future, as yet un-evidenced, market demand is at odds with the Council's ambitions to support economic growth within the borough and across Heathrow Opportunity Area in particular. Supporting the change of use of Bedfont Lakes from office use to industrial / logistics could support immediate occupier demand and welcome an estimated 660 FTE jobs, £48.3 million in GVA a year (including £32.5 million In LBH) and £1.9 million in annual Business Rates to the borough once operational.
- 3.13 The degree to which the Council is safeguarding office space despite a lack of recent take up goes against the intentions of the Local Plan which states that the Council will ensure *'that significant additional capacity is provided for anticipated sectors of employment growth'*. With historic trends in office take up being low, the Council acknowledges that office allocations are a means of safeguarding for the future, as opposed to being for immediate or evidenced demand. This approach will not support employment growth over this plan period.
- 3.14 There is a recognised and immediate market for industrial uses in close proximity to Heathrow, evidenced not only in the ELR numbers but also in the Council's intention to release Green Belt specifically to support this growth. This ignores the economic growth which would be supported by sites such as Bedfont Lakes in an existing brownfield location and relies heavily on multistorey development which as yet remains largely unproved on viability grounds. These sites could take many years to materialise.
- 3.15 As such, the Local Plan should review Key Existing Office Locations (KEOLs) and not protect office use at sites KEOLs where there is a lack of market demand, and which could support alternatively make a significant contribution towards LB Hounslow's deficit of Industrial Land.

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

Response

- 3.16 For the same reasons set out above, our Client does not consider their site at Bedfont Lakes should continue to be protected for office use throughout the Plan period when it is demonstrated it could make a significant contribution to the delivery of industrial land within the Plan period.
- 3.17 Redevelopment of Bedfont Lakes for industrial and logistics use would provide an immediate response to market demand. Based on an indicative development option of 32,000 sqm over 5 units (of a range of sizes in accordance with Local Plan policy) this would result in the following estimated economic benefits¹²:
- 90 Full Time Equivalent (FTE) jobs on site and £24.0 million in Gross Value Added a year, including £21.4 million in LBH during construction (not including benefits creating during demolition phase)
 - 660 FTE jobs supported on site once operational
 - £48.3 million in GVA per annum, including £32.5 million in LBH
 - £1.9 million in Business Rates a year.
- 3.18 The site would deliver 25% of the net additional industrial land needed in the West of the Borough in the 2025-30 period.
- 3.19 If the space is used for industrial rather than office then the economic benefits will materialise within the plan period. There will also be a positive implication on the need for Green Belt release – either through reducing the total quantum for release, or by adding to the total of industrial land added to the supply to help meet the overall deficit.
- 3.20 The historic location of office uses at Bedfont Lakes does not automatically make it the right location for future office use. The table below identifies the characteristics required by industrial/logistics occupiers and office occupiers and compares Bedfont Lakes against these requirements, illustrating closer alignment between industrial/logistics occupier requirements than office.

¹² This is based on the indicative scheme and broad assumptions with regards to split by B2 and B8 uses and is for illustrative purposes only at this point in time.

Table 3.4: Locational Requirements of Industrial/Logistics and Office Occupiers

Characteristic	Industrial / Logistics Requirement ¹³	Office Requirement	Bedfont Lakes Characteristic
Proximity to National Highways Network	Y	N	Y
Large Site Size to Accommodate Larger Floorplates and Yard Space	Y	N	Y
Within an Urban Centre	N	Y	N
Proximity to Labour Force	Y	Y	Y
Proximity to Consumer Market	Y	N	Y

Turley Economics, 2025 drawing on BPF (2018) What Warehousing Where and our held sector knowledge

- 3.21 Indeed, the ELR (2024) made it clear that *‘with the prospect of a third runway coming forward in the next plan period (to 2041) now remote, the previous positive ‘spin’ on the office market promoted by the Heathrow related evidence suite no longer appears pragmatic nor relevant to the emerging plan’*.
- 3.22 Bedfont Lakes’ proximity to the M25 (Junction 13), located at a roundabout on the A30 for access into central London as a last mile or regional distribution location as well as adjacent to London Heathrow airport for freight movements makes it ideal for industrial and logistics occupiers. This accords with the policy position for the Heathrow Opportunity Area as covered in Chapter 2 of this paper.
- 3.23 The Local Plan states that *‘the borough’s own employment land studies clearly highlight that land is required within the west of borough area to accommodate growth associated with large format logistics and distribution, much of which is lined to activities at Heathrow Airport. More land is therefore required in proximity to the airport for businesses reliant on it’*.
- 3.24 Green Belt land is being identified to assist in meeting this demand. Redesignating Bedfont Lakes would provide up to 35,200 sqm of industrial and logistics floorspace in this area and help reduce the reliance on redrawing the Green Belt boundary. This is in the context of the ELR and EX09 recognising that *‘there is no short-term pipeline of space’* and that there is *‘an urgency of finding a solution to this shortfall of land’*.

¹³ It is acknowledged that it is not always possible or realistic to conflate the requirements of industrial and logistics occupiers. This is for illustrative purposes only given that industrial and logistics demand is considered jointly within the ELR and Local Plan.

Bedfont Lakes would be able to deliver 25% of the 142,900 sqm of need for industrial land in the West of the Borough identified for the 2025-2030 phase of the Plan.

- 3.25 In order to be positively prepared, it is therefore considered the Local Plan should consider the de-designation of Bedfont Lakes as a Key Office Location and instead promote it as Industrial Land, in order to meet the deficiency in land to meet the Borough's objectively assessed industrial need.

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

Response

- 3.26 As set out within the responses above, it is considered that the Local Plan should consider the repurposing of obsolete Key Existing Office Locations to deliver industrial land where it is demonstrated there is lack of demand for office use at those sites.
- 3.27 Doing so at Bedfont Lakes could deliver 25% of the 142,900 sqm of need for industrial land in the West of the Borough identified for the 2025-2030 phase of the Plan.

Question 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?

Response

- 3.28 As set out previously in Responses to Questions 1, 2 and 5, our Client has demonstrated that the continued designation of Bedfont Lakes as a Key Office Location is not justified.
- 3.29 Appropriate evidence has been provided to demonstrate the Local Plan overestimates the Office need over the Plan Period and the protection of office use at Bedfont Lakes is not justified to meet office needs.
- 3.30 LB Hounslow has a pipeline supply of office floorspace equivalent to seven years of need, as stated within their own ELR. Accordingly, it is only after seven years that undersupply could arise. The ELR acknowledges that, at the next periodic plan review, i.e. in five years time, *“there is scope to identify more supply within the plan period if needed”*. Accordingly, the loss of office use at the Site at this time would not prejudice the plan-making process, as there is sufficient office supply to surpass the next Local Plan review, at which point office supply can, in any case, be reviewed.
- 3.31 However, as demonstrated in the response to Question 2 of this response, occupier demand for office floorspace in Hounslow is over-estimated in the ELR by some 49%, and therefore their current supply is in fact more like double that at 14 years.
- 3.32 As such it is not consider the identification of Bedfont Lakes as a Key Office Location is still justified, given the demonstrated lack of market demand at the site despite significant efforts and investment by our Client to increase the attractiveness of the park to potential occupiers.
- 3.33 In order to be positively prepared, to meet industrial need, our client considers their site at Bedfont Lakes should be de-designated as a KEOL to enable the site to come forward for industrial and logistics development, with which it could make a significant contribution to LB Hounslow’s identified need for industrial land.

Question 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?

3.34 Draft Policy ED2 is of particular relevance to the site and our Client given its protection for office use of KEOLs.

3.35 As set out previously, within R19WR our Client also has a couple of proposed alterations to the wording to ensure the draft Policy is sound:

Part C

3.36 Firstly, as set out above, Our Client considers Bedfont Lakes should be removed as a KEOL and the justification for this will not be repeated here.

3.37 However, should Bedfont lakes remain designated as a KEOL it is considered Part C of draft Policy ED2 policy should also support the opportunity to deliver alternative employment uses in such locations should there be little demand for the existing office use but strong demand for alternative employment uses.

3.38 NPPF Paragraph 86 states that planning policies should *“be flexible enough to accommodate needs not anticipated in the plan... and to enable a rapid response to changes in economic circumstances.”*

3.39 Consequently, the flexibility to enable this should be provided within Part C of draft Policy ED2 and our client proposes the Policy be amended to:

“C. Managing and protecting Key Existing Office Locations; as identified on the Policies Map namely the borough’s four town centres (Hounslow, Chiswick, Brentford and Feltham), Chiswick Business Park, ~~Bedfont Lakes~~ and sections of the Great West Road, for office use or alternative employment uses subject to assessments of demand for both office and employment uses.”

3.40 The above change is considered to be necessary to ensure that the plan is positively prepared, justified and consistent with the NPPF in order to deliver employment growth, and that it strikes an appropriate balance between the need to protect office and employment floorspace but also deliver alternative employment uses where it is demonstrated office use isn’t viable but alternative employment uses are.

Part H

3.41 Part H of draft Policy ED2 sets out that to justify the loss of office use in KEOL that 2 years worth of marketing evidence is required.

3.42 As set out above, NPPF Paragraph 86 states that planning policies should *“be flexible enough to accommodate needs not anticipated in the plan... and to enable a rapid response to changes in economic circumstances.”*

3.43 While our Client acknowledges the Council’s desire to ensure that the borough is able to meet its office needs, this requirement is considered unduly onerous if alternative employment uses are proposed. The requirement to provide 2 years worth of

marketing evidence would prevent sites from adapting quickly to changing economic circumstances, and from diversifying in the manner needed to respond to changes employment demand, preventing the timely redevelopment of such sites for alternative uses (which may also generate good employment densities), to which they may be better suited. The risk is that this leads to sites lying vacant for unnecessarily long periods of time, with negative implications for the wider economy of the Borough.

3.44 Marketing evidence for this should also be applied flexibly and consider marketing evidence from other similar / equivalent buildings or sites within the KEOL to ensure prolonged vacancy of a site is not maintained whilst other economic benefits could be sooner realised through an alternative employment use.

3.45 Our Client therefore requests that Part H is amended as follows:

“H. Submit the following information where a loss of e.g. i, ii, iii, B2 or B8 or similar employment uses is proposed outside of SILs and LSISs:

I. Evidence of active marketing of the site for employment uses for a period of at least two years in Key Existing Office Locations (or a period of least one year when a change of use to another employment use is proposed in Key Existing Office Locations) or for a period of at least one year in other locations. Consideration should also be given to marketing evidence of other buildings within the same Key Existing Office Location;

II. An assessment demonstrating that the introduction of nonemployment uses is necessary to achieve sufficient viability to deliver a development scheme. Preference will be given to the provision of new employment uses, followed by a mix of employment and non-employment uses. Proposals for nonemployment uses will only be considered once the retention of employment uses has been shown to be unviable; and

III. Evidence that surrounding employment uses/ sites will not be undermined;”

3.46 The above change is considered to be necessary to ensure that the plan is positively prepared, justified and consistent with the NPPF in order to deliver employment growth, and that it strikes an appropriate balance between the need to protect office and employment floorspace but also deliver alternative employment uses where it is demonstrated office use isn't viable but alternative employment uses are.

Question 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)?

Response:

- 3.47 As set out previously, our Client has an existing underutilised employment site that is not within the Green belt and could make a significant contribution towards meeting LB Hounslow's unmet industrial need.
- 3.48 Redesignating Bedford Lakes would provide up to 35,200 sqm of industrial and logistics floorspace in this area and help reduce the reliance on redrawing the Green Belt boundary. This is in the context of the ELR and EX09 recognising that *'there is no short-term pipeline of space'* and that there is *'an urgency of finding a solution to this shortfall of land'*.
- 3.49 Bedford Lakes would be able to deliver 25% of the 142,900 sqm of need for industrial land in the West of the Borough identified for the 2025-2030 phase of the Plan.
- 3.50 Consequently, our client considered that LB Hounslow have not made as much use as possible of suitable brownfield sites and underutilised land that are not currently within the Green Belt in order to meet the identified industrial need.