

HOUNSLOW LOCAL PLAN EXAMINATION STAGE 1 HEARING SESSIONS IDENTIFIED BY THE INSPECTORS**ON BEHALF OF SEGRO (RESPONDENT 098, 099) – MATTER 2 SPATIAL STRATEGY AND STRATEGIC POLICIES****Question 1 – Does the Plan’s vision and key objectives provide a positively prepared and justified approach for Hounslow’s future growth?**

1. Yes. The Spatial Vision reflects property market dynamics at play, through two submarket areas, namely West of Borough and Great West Corridor. These areas are part of a spatial framework that direct development to appropriate areas, notably larger footprint industrial and logistics uses to West of Borough.
2. West of Borough is coterminous with Hounslow’s share of the Heathrow market area (and London Plan Heathrow Opportunity Area) where demand for large footprint industrial and (heavy) logistics uses is focused, serving Greater London and the wider South East via the strategic road network, and Heathrow Airport.
3. ‘Promoting Economic Growth and Inward Investment’, the second ‘Vision for Hounslow’, highlights a convergence of growth potential afforded by Hounslow’s position as a major gateway, a major reason Hounslow is and will continue to be a key contributor to London’s economy. In terms of employment land supply, this is supported by ‘Objective Two: Promoting Economic Growth and Inward Investment’, paragraph A, C and D.

Question 2 – Does the Plan as submitted appropriately identify “strategic policies” or are the Council’s proposed modifications necessary for soundness?

4. Yes, therefore no modifications are necessary. Policies for Great West Corridor (P1, P1a, P1b, P1c) and West of Borough (P2, P2a, P2b, P2c (Land at Hatton Fields)) are clearly articulated. We note the repeated references to intensification, an objective that is supported, but which for many development typologies, does not apply. For example, large scale industrial and logistics, essential UK and London economic infrastructure, whose operating model depends on them being able receive, handle, store and despatch heavy loads. Development cost and functional limitations prevent these operation from going above one storey, outside (yard) space for goods in, goods out and manoeuvring serves to maintain a relatively low (compared to other uses) plot ratio.

Question 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?

5. Yes, from property market perspective, development is direct to the right areas, specifically, industrial and logistics used to West of Borough (Hounslow's share of the Heathrow market area), where market demands are different from those that characterise and will be promoted Great Western Corridor

Question 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?

6. Yes, these are sufficiently clear about the amount of new employment development envisaged. Figure SS1 (page 23), depicts the ten districts, comprised of six Place Policy areas, Town Centres (x3), Large Neighbourhood Centres (x5) the West of Borough / Heathrow OA and Great West Corridor OA. Site allocations are also mapped, meaning that policies can be interrogated, down to district level.
7. For example the industrial and logistics development needs position articulated for West of Borough in Policy ED 1 (see EX9, page Table 4a), is addressed in Policy P2 (*West of the Borough*), part c (*Allocating land for new industrial floorspace within key locations as identified in the site allocations, including new Locally Significant Employment Sites at Hatton Cross (Land at Hatton Road and vacant land at Dick Turpin Way)*).
8. Policy P2 (c): Land at Hatton Fields then details the place policy area boundary, the site allocations boundary, the LSIS boundary and the approximate industrial and logistics floor area that the allocation is expected to deliver.

Question 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?

9. Table 2.1 (London Plan) indicative figure for Heathrow OA is based on evidence that it now dated and is superseded by the Council's most recent analysis, which incorporates their latest supply position (completions and permissions). This underpins the

floorspace needs identified by the Council (EX9, Table 4a) for West of Borough. This is more reliable and robust basis for determining industrial and logistics floorspace requirements than the indicative figure included in the London Plan.

10. West of Borough employment land allocations will deliver industrial and floorspace, that will then accommodate jobs in occupation relevant to the floorspace use. The number of jobs will vary, depending upon use, occupier operating model, levels of automation, etc. For that reason, floorspace requirements are a more appropriate measure of industrial and logistics development needs than jobs, justifying the omission of a jobs target.

Question 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?

11. The boundary is in general conformity, noting the latest London Plan AMR (published September 2025) confirms that the Heathrow Opportunity Area boundary status is classified as 'emerging' and the planning policy instrument is identified as the 'Local Plan (Hounslow)'
12. AMR indicates that the boundary (for the Hounslow part) will be finalised through the plan making process. The emerging boundary status reflects the status of the West of Borough Policy, that is emerging, to be finalised through the plan making process and ultimately adopted as part of the Local Plan.
13. The boundary envelopes the Hounslow part of the Heathrow property market area, a distinct market within Hounslow, recognised as an area of high demand for large scale industrial and logistics occupiers that seek to leverage its significant 'gateway' locational advantages.

b) Whether the other specific requirements of development proposals are sufficiently clear to be evident how a decision maker should react to development proposals?

14. Yes this is generally the case. SEGRO refer to their response to the Hounslow Local Plan 2020-2041 (Proposed Submission Version) to Policy P2 (c) Land at Hatton Fields.
15. Policy P2 (c) relates to Land at Hatton Fields and the Council's intention to make a selective and limited alteration to the Green Belt, to release land to help deliver the Borough's requirement for new industrial land during the plan period. It is recognised in

the policy that much of this need is derived from businesses associated with activities at Heathrow Airport, and this is therefore a suitable location to meet this need. We note this policy needs to be read alongside Chapter 12 Site Allocations for Land at Hatton Fields (Sites A, B and D) and Dick Turpin Way (Site C) and vice a versa. It should also be noted that the employment allocation at Dick Turpin Way identifies a further 11,900 sqm of Class B2/B8 development which is supported.

16. The Council will expect to see land in the northern portion of Hatton Fields provide a new logistics and industrial park, comprising approximately 63,000sqm of floorspace. SEGRO supports Policy P2 (c) given the sites represent a unique opportunity at this location due to its scale and excellent connectivity via a range of transport modes.
17. SEGRO consider Policy P2 (c) is positively prepared as it will secure at least 63,000m² of B2/B8 industrial floorspace at the Hatton Fields through the allocation of a new, strategically located LSIS. 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, and by making this alteration to the Green Belt boundary. SEGRO's interest at Hatton Cross will deliver a significant proportion of this in a sensible and sustainable location.
18. The Employment Land Review 2024 Update concludes that over the plan period there is a shortfall of 130,000 sqm industrial floorspace, after pipeline (land with planning permission), intensification of brownfield sites and Green Belt sites (including Hatton Fields/Land at Dick Turpin Way) are included in the supply which is a much stronger need case compared to the 2020 Update. SEGRO recognise that without the proposed allocations at Hatton Cross, the Council's unmet need would increase by approximately 75,350 sqm which is significant and highlights the importance of the draft allocations at 48 and 57. Indeed, SEGRO has received significant market interest from potential occupiers wishing to utilise its strategic location and anticipate that it can be developed quickly for operational use.
19. The policy and proposed removal of Site Allocations 48 Vacant Land at Dick Turpin Way and 57 Land at Hatton Fields from the Green Belt and designation as a LSIS is aligned with Paragraph 20 (a) of the NPPF, which calls for strategic policies that set out an overall strategy for the pattern, scale and quality of development, including making sufficient provision for, among other things, employment provision.
20. Policy P2 (c) is also aligned with Paragraph 86 (a) of the NPPF as it positively and proactively encourages sustainable economic development through a clear economic vision and strategy. It represents the identification of a strategic site for local and inward investment to match the strategy and meet identified needs over the plan period in line

with Criterion (b) and will enable the Council to respond to rapid changes in economic circumstances as per Criterion (d).

21. SEGRO considers the Hatton Fields allocation accords with the guidance around addressing the locational requirements of storage and distribution operators at a variety of scales and in accessible locations. As such, it is consistent with Paragraph 87 of the NPPF and the published guidance on assessing need and allocating space for logistics contained in the Planning Practice Guidance (PPG) Housing and Economic Needs Assessment Section. In summary, whilst we acknowledge and endorse the designation of Hatton Cross (Sites A, B, C and D) as employment land to provide new LSISs, to ensure an 'effective' policy in accordance with NPPF paragraph 35(b), SEGRO wish to object to the points below.

Requested Changes

22. Notwithstanding the above, SEGRO request the following changes to Policy P2 (c).
Figure P2.4: Land at Hatton Fields Place Policy – this Figure shows the location of a vegetated buffer between industrial, and nature uses. SEGRO is committed to the protection of residential amenity via a wide, high-quality and landscaped corridor/buffer zone. We refer to the submitted Vision Document (as part of our response to the Hounslow Local Plan Proposed Submission Version), which shows landscaping corridors proposed to be provided along the southern boundaries of Site B in order to provide visual screening of the buildings to the new community park to the south. However, given detailed landscape work has not yet been undertaken, SEGRO requests this vegetated buffer is labelled as 'indicative' at this stage of the Local Plan.
23. Policy P2 (c) – indicates the Council will “expect to see land in the northern portion of Hatton Fields provide a new logistics and industrial park, comprising approximately 63,000sqm of floorspace. It will expect this to be of a high-quality design incorporating high standards of sustainability, well-integrated walking and cycling routes, and protecting existing remaining open spaces”. Figure P2.4: Land at Hatton Fields Place Policy should be updated to clearly show the area of protected open space to ensure the split of land uses is clearly shown. We also suggest amendment to policy wording as shown above in bold type.
24. For consistency, could we request the floorspace figure is given as “approximately 63,450sqm” throughout the Local Plan. This accords with the figure given in the Council's employment evidence base.