

HOUNSLOW LOCAL PLAN: SUBMISSION BY FORCE

DECEMBER 2025

Introduction

Friends of the River Crane Environment (FORCE) have been engaged with the Hounslow Local Plan since 2015. We have responded to each round of consultation and attended the previous Inquiry sessions in late 2021. Our current position regarding the Hounslow Local Plan proposals is as follows:

- We are pleased that both the large scale transfer of Green Belt to Metropolitan Open Land and the removal of protected Green Belt status from five of the seven large sites in the Crane Valley have been removed from the new Plan
- We remain concerned about the principle of Green Belt releases and in particular about the proposed release of the remaining two large open space sites in the Crane Valley (Hatton Fields and the Western International Market site in Cranford). Both open spaces are proposed for release for industrial use

Our concerns about these two site releases can be considered in two categories:

- The value of the sites as green spaces and as part of the Crane Valley open space network
- The demand and availability of space for industrial use

We have provided more information on these below. We have also included our Opening and Closing Submissions to the Inquiry in 2021 as these provide valuable supporting information for this submission.

The Existing and Potential Value of the Green Spaces

1. Both of the sites (Hatton Fields and WIM Cranford) are classed in LB Hounslow's own 2021 assessment as moderately performing Green Belt sites. This should be good enough in itself to retain their Green Belt status. Note however that this assessment is based only on their existing known value in 2021 and does not reflect (a) aspects of their existing value that are not known; (b) their potential for improvement as community and biodiversity assets and (c) any changes that have happened since 2021
2. The Friends of Hatton Fields has been set up over the last five years and has already been very successful in enhancing the community engagement and use for the Hatton Fields site as well as identifying and growing its community and biodiversity value. This is despite little or no funding or support from the council and little prospect of getting any from third parties whilst the threat of development hangs over the site
3. The Crane Valley Partnership (CVP) www.cranevalley.org.uk operates to protect and enhance the community and environmental value of the open spaces and rivers of the Crane Valley at a catchment scale and their remit includes both these sites. CVP has improved large swathes of the open spaces across the Crane Valley over the last five

years with major funding from Thames Water and other parties that will continue to at least 2030. The broad approach to date and strategy for the next five years is set out in the State of the Crane Environment Report <https://www.cranevalley.org.uk/wp-content/uploads/2025/02/State-of-the-Crane-Environment-Report-February-2025.pdf>

4. We are not aware that any significant assessments have been carried out by LB Hounslow in to the community and/or environmental value or potential of these two major open spaces sites over the last ten years. This is despite FORCE and others flagging this lack of council engagement in every submission we have made since 2015. In our view this shows a lack of due process as well as interest in these values due to a pre-disposition for development.
5. FORCE carried out bat surveys at several of the threatened site in the summers of 2022 and 2023 – including Hatton Fields. The results of these surveys are provided in the report below and show the Hatton Fields site has a healthy and diverse bat population. We are not aware of any LB Hounslow bat surveys (or surveys for any other species) carried out on this or the WIM Cranford site
<https://www.force.org.uk/assets/documents/wr-2022-2023-bat-monitoring-re>

In our view the Council has not adequately considered either the existing value or the potential value of these two sites as community and environmental resources for the borough and the Crane Valley, despite having a decade since the first submission to commission and assess these values and potentials.

The Demand and Availability of Space for Industrial Use

1. In our submission to the Inspector in 2021 we flagged the failure of LB Hounslow to co-operate with neighbouring boroughs regarding the identification of land for industrial use. We are still not aware that the council has adequately considered this issue with respect to LB Hillingdon and Spelthorne BC in particular.
2. The Friends of Hatton Fields have indicated the large quantum of opportunities for re-use of existing industrial land with respect to under-used and vacant 20th century industrial sites and we trust that this is presented in their submission and will be considered by the Inspectors.
3. One major concern with the Plan proposal to release a large hectarage of green open space for industrial use is that it will greatly reduce the likelihood that all (or indeed any) of these existing older under-used and sometimes disused sites are re-developed over the next twenty years to meet the needs and challenges of the 21st Century.
4. A large part of the justification for the release of these sites is based on the continued growth of air freight traffic for an expanded Heathrow. The likelihood of Heathrow expansion has waxed and waned several times over the last 20 years and we are very concerned that a large swathe of Green Belt might be released from protection now and in advance of any planning consent or financial commitment to growth at Heathrow. Any permissions at Heathrow still face considerable opposition and disagreement with regard to climate change and environmental impacts; alternative airport development opportunities and realities around London; and the major and unsecured costs associated with Heathrow development.
5. Clearly, if the Green Belt protections for these two sites were removed, then this land would be developed for other purposes regardless of Heathrow expansion, as it would be cheaper to do so than re-developing existing sites (as referenced in 2 above) – but

this would be only to the benefit of the developers concerned, and not to the benefit of the council or local communities, and would represent poor planning for the future.

We have registered to speak at the relevant parts of the upcoming Inquiry in 2026.

APPENDIX A

OUTLINE POSITION STATEMENT: HOUNSLOW LOCAL PLAN REVIEW 18TH NOVEMBER 2021

Thank you very much for the opportunity to present this Outline Position Statement from FORCE. My name is Rob Gray and I have been a Trustee of FORCE for 18 years. I can confirm that this statement provides no new evidence but does seek to summarise our position.

Friends of the River Crane Environment (FORCE) is a local charity, formed in 2003 to protect and enhance the community and environmental value of the Crane catchment in the boroughs of Hounslow and Richmond. We currently have 764 members. FORCE has been engaged with these Local Plan proposals since 2016 and has submitted a number of documents in response to them, which we hope the Inspectors will review.

The sheer scale of the proposals in this Plan takes some getting used to. FORCE might typically engage with a project that proposes a site re-development of a hectare or so – maybe five hectares for the largest sites. This Plan proposes the wholesale removal of over 500 hectares of Green Belt protection across 17 sites – 100 times the size of the largest proposals we have responded to in the past.

In our view the nature and scale of this Plan threatens the essence of Green Belt protection, both in this borough and across Greater London. If this Plan were to go through, then few Green Belt sites in London could be considered safe.

We are most concerned about the seven major, and several smaller Green Belt sites, proposed for development. However we also have deep concerns about the proposed changes from Green Belt to MOL. Green Belt provides some protection against overbearing adjacent development. The experiences in the east of the borough, where high-rise development is being permitted and encouraged adjacent to high-value MOL sites such as Gunnersbury Park, perfectly demonstrate the reason for our concern. The social and mental-health value of these Green Belt sites lies to a significant degree in their providing a natural sanctuary, with no views of surrounding urban development. This is a rare and precious characteristic for urban residents.

Of the seven “Proposed releases for development”, the Council’s own review finds one strongly-performing and five moderately-performing in their Green Belt functions. We believe the existing green-space value could be greatly enhanced through better management. We point the Inspectors Mr Chris Hern’s submission for a learned examination of the validity of the Green Belt designations.

The justification for removing Green Belt status therefore rests entirely on the “exceptional circumstances” argument. The council has stated this to be based on the demand for growth and appears to be extrapolating growth to 2035 (or even 2037) as the basis for these de-designations.

In 2016, when this plan was started, the planning context was fundamentally different from today. It was pre-Brexit, pre-pandemic and the government had not created its levelling-up

agenda; Heathrow Airport was thriving with major development plans in the offing. Each of these changes will have had major impacts on the growth forecasts on which the plans are based.

Climate change and the health agenda are now front and centre of everyone's thoughts. Hounslow's representative stated in his opening address last week how central green space, sustainability and climate were – these are not words we would have heard from the council five years ago. And yet, despite all these changes, this plan remains largely unaltered from 2016, with the same "exceptional circumstances" argument for large-scale Green Belt removal surviving unscathed.

In our view, even if the Plan approach had any validity in 2016, it has none now. The assumptions on which this plan was based in 2016 have not merely been modified, they have been totally upended.

The problems of the Plan approach are exacerbated by its long term nature, with growth projections to 2035/7. It would surely be deeply irresponsible to remove protection from a huge swathe of Green Belt land now, when the forecast need is so far in the future, and that future is so much in doubt.

Over the last ten years FORCE has engaged with a large number of developments along the Crane valley, within and local to Hounslow. In each case developers have taken an existing 19th/20th Century development site, often polluted and/or no longer fit for purpose, and transformed it into a housing, mixed-use and/or industrial development fit for the 21st Century, with significant environmental benefits built into the scheme itself and the surrounding area.

There are many run down sites remaining across the borough and elsewhere in this part of London. However, if these proposed major releases of Green Belt were to go ahead, then simple economics dictate that there will be no more large-scale re-development schemes coming forward in this or surrounding boroughs. It will *always* be quicker and cheaper to develop Green Belt. This Plan would not only impact the potential for site re-development in LB Hounslow but in neighbouring boroughs.

We note that the council believes that a net biodiversity benefit can be delivered through developing these sites – but also that responsibility for delivering this will fall upon the developer. Our experiences of the realities of this approach over the last eighteen years have been patchy at best. We also note that the council has not employed an ecology officer since 2016 and has therefore not had the in-house expertise necessary to regulate any developer's actions in this regard. Moreover, the huge opportunities to transform these Green Belt open spaces into high-performing green lungs over the next decade; for the social, economic and environmental betterment of the borough; and to help meet so many of the Council's other policies; would be lost for ever.

We are in short absolutely clear that these Green Belt open spaces would contribute a vastly greater amount of biodiversity, public health and wider social benefit if they were managed solely for this purpose.

In summary, these proposals represent the largest threat to open space at a regional level for many years. Not just in themselves but the precedent they would set for Green Belt development, with knock-on effects on green spaces and run-down developed land across the Capital. That is the reason we, as local volunteers and community representatives, have been Objecting to these proposals for the last five years, and it is why we are here today.

The Inspectors have asked for alternative proposals that participants would find acceptable. We are not in a position to pick and choose the relative merits of the sites under threat. We propose that the Council withdraws all its Green Belt proposals, presses the pause button given all the uncertainties around development and growth, and uses this opportunity to work with all parties to enhance the environmental and community value of these Green Belt areas.

We can point the Inspectors to plenty of local examples where this has been achieved, with the support of FORCE, on other Green Belt sites over the last ten years; and to our usage surveys which count the thousands of local people who now benefit from them every day. This approach would bring this part of the Local Plan much more closely in line with the council's aspirations around climate change, biodiversity, public health and green growth for example. FORCE would be very happy to support the council in this endeavour.

APPENDIX B
HOUNSLOW LOCAL PLAN REVIEW: CLOSING STATEMENT: 23RD NOVEMBER 2021

FORCE remain very concerned about the council's proposals to remove a total of 558 hectares of open space from Green Belt protection, equivalent to 45 per cent of the total Green Belt in the borough. This Examination of the principles underpinning this plan has only increased these concerns.

Our first concern is the Council's lack of clarity with regard to the relative protections of Green Belt and MOL. We set out our concerns regarding the differences between Green Belt and MOL protections and we heard the council's response with reference to London Plan policy G3. However, we noted that this policy only references the protected land itself and makes no reference to the context. We do not know about the differences between Green Belt and MOL in strict policy terms. However, our experience (and that of others) is that a Green Belt designation has more value in practice, when arguing against over-bearing adjacent development.

We note that the council submitted that an MOL designation would make it easier to provide enhanced environmental quality and access – which would appear to be an acknowledgement of a difference in practice between the two designations.

In short, we do not understand the argument put forward by the council for changing the designation of this land. The council appeared to say that the adjacent urban areas are part of the same overall Metropolitan area. However, other Council policies clearly differentiate between the different towns and communities within the borough. We draw the Inspectors attention again to the evidence provided by Mr Chris Hern, who in our view has considered this matter in most detail.

Finally, it was not clear whether the council were content or not to retain the Green Belt designation. Given that the council acknowledged that it was "*not the norm*" to make such a change, that their main argument for change appears to be a marginal one around the neatening of designations, and that re-designation raises further knotty issues around the Exceptional Circumstances argument, we contend that it is better all round for the sites to remain as Green Belt.

Our second concern is that the basic planning assumptions underpinning this Review are no longer relevant. In our Opening Statement we listed a number of major changes to the planning landscape over the last five years which we might have expected to cause the council to press the pause button on the removal of such a large quantum of land from Green Belt for development. The Examination has introduced two further issues we were not aware of: (a) that the council has not engaged with LB Hillingdon around the duty to co-operate – and that Hillingdon has not been able to progress its plan due to the uncertainties around Heathrow development and (b) that there is so much doubt around the Council's Housing Trajectory. In our view this needs to be subject to detailed examination.

This planning process now appears to have the qualities of a race between the two boroughs, with Hounslow taking advantage of Hillingdon's delay to get its development proposals in

first. This is consistent with the sites for de-designation apparently being selected, not for their lack of Green Belt value, but for their development value linked to Heathrow.

We also noted the council's statement at this EiP that sites have been selected for de-designation to "*provide a good quantum of buffer over and above the need*". This is clearly not consistent with requiring an exceptional circumstance to trigger de-designation.

In addition, it was interesting to note that "*the UK airfreight economy*" is the main driver for these major development proposals. Given the existential threats of climate change, is it realistic for air freight demand to continue to grow until 2035 and beyond? Further, is it really tenable that a council which regards climate change "*as being a golden thread running through its plan*", would seek to de-designate and develop large swathes of Green Belt now in response to such a long term prospect?

A third concern is that these Green Belt spaces have not been evaluated as "assets". The positive contribution that they can make in terms of physical and mental health, carbon capture, flood attenuation etc has simply not been considered. We do not know if this represents a failure with regard to planning policy, but it seems to us to be a failure of a wider duty of the council with respect to its open space.

A fourth concern is how these proposals are skewing the market. The council were emphatic that their plans are responding to a huge demand for logistics based development. At the same time the developers were emphatic that the re-development of existing sites for this purpose is not viable – "*There is no money in it*". Those two statements would not both be true if the development market were working effectively. This clearly illustrates the fact that the market will not pursue innovative and challenging development solutions whilst there has been the prospect, over the last five years, of large scale Green Belt release.

We were struck by the eagerness of the council and the developers to find a precedent for these Green Belt proposals, identifying four sites in the North West which in reality have little in common with these. How much more will developers, across London and beyond, look to use the precedent set by this proposal, if it is allowed by the Inspectors. They will use it to state that a forecast demand some ten or more years hence (or even a need for *additional buffer*) represents a sufficient exceptional circumstance to remove Green belt protections now. Purpose 5, and with it the prospect of re-developing existing sites and developing innovative solutions, will be dead in the water. No Green Belt site would be safe.

Our fifth concern, based on our practical experience of the last ten years, is that the Council is simply not equipped to deliver the offsetting environmental and biodiversity benefits that it claims. The council appeared to suggest that the removal of all these open spaces from Green Belt should provide FORCE with some comfort; "*Better to do it all now so it won't happen piecemeal in the future*". There is no comfort in that argument – the evidence from these Examinations is that developers are already sniffing out opportunities for more Green Belt releases and will become insatiable if the council is allowed to set this precedent.

The council also asks FORCE to be comforted by the prospect of more investment in the remaining green spaces as a result of these developments. However, funding is not the major

problem for open space enhancement in urban areas. We are already engaged with £10 to £15m of environmental enhancement schemes across the Crane valley over the next five years. The problem is lack of open space. This Plan will reduce this by a further 200 hectares plus.

We are also very concerned that the need to provide compensatory improvements linked to development will act as a constraint on the council supporting such improvements prior to these developments taking place. Open spaces up and down the river corridor are being improved now and there is great momentum and major funding supporting these improvements over the next five years. This development trap, resulting in any further improvement being delayed and stalled for many years, is a further negative impact of any large scale green belt release.

In addition, if this Plan goes forward then FORCE and others would be spending yet more time, which could be invested in improving these spaces, in fending off multiple proposals from developers, using this Plan as their precedent.

We therefore ask the council again to pause their proposals and work instead to enhance these open spaces. FORCE has 18 years' experience of working with councils to achieve this and we have seen the community and environmental value of sites transformed by medium to long term engagement with moderate amounts of funding.

This is not a request for all development to pause – new development proposals will continue to come forward – but our hope is that these proposals would be more appropriate to the main challenges of the 21st Century, if and when these Green Belt changes are dropped from the Plan.