

12 December 2025

Programme Officer
Charlotte Glancy

Reference

KP0084 Hatton Road,
Bedfont

Cc

Messers J & A Cornell, JCAL

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Dear Ms Glancy

Subject: Examination of the Hounslow Local Plan 2020 - 2041

Response on Matter 4 of MIQ dated 21 November 2025

We submit a response on behalf of our client, JCAL Limited, to the Matters Issues and Questions (MIQ) dated 21 November 2025.

We reiterate our objection framed in terms of Matter 4, Issue 1 (Qns 17-22). In our view, the proposed modifications referenced as HLP_C2_36 and HLP_C2_37 to policy P2(c)/ Site 57 Land at Hatton Fields do not properly deal with the strategic measure of the proposed Green Buffer. In particular, with reference to the site at 373 Hatton Rd Bedfont since it unnecessarily bisects the site and is avoidable through more nuanced consideration. For example, redrawing the boundary of the new employment site to include this employment site, instead of leaving the western half out of the site.

Matter 4, Issue 1

Qn 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)?

- No. See JCAL reps to date.

b) Would the density of development of employment sites that are not currently within the Green Belt (and MOL) be optimised?

- No. See JCAL reps to date.

Qn 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)

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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:

a) suitably identify the locations and appropriate scale of areas to be assessed?

- See JCAL reps to date.

b) evaluating the contribution each assessment area makes to Green Belt purposes?

- See JCAL reps to date.

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?

- See JCAL reps to date.

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?

- See JCAL reps to date.

e) taking account of the intended permanence of Green Belt boundaries in the long term so they can endure beyond the Plan period?

- See JCAL reps to date.

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).

- **Noted. JCAL wishes to be included.**

Qn 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?

- No. See JCAL reps to date.

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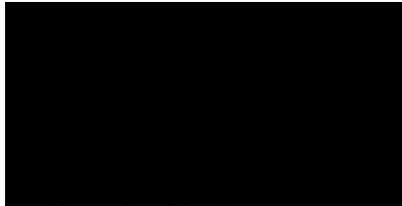
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Qn 22. Is the expectation in Policy GB1 that development proposals maintain the openness, setting and visual amenity where it is near the Green Belt and MOL – justified and consistent with national policy?

- No. See JCAL reps to date.

I trust the response can be recorded and I look forward to receiving confirmation.

Yours sincerely



Managing Director

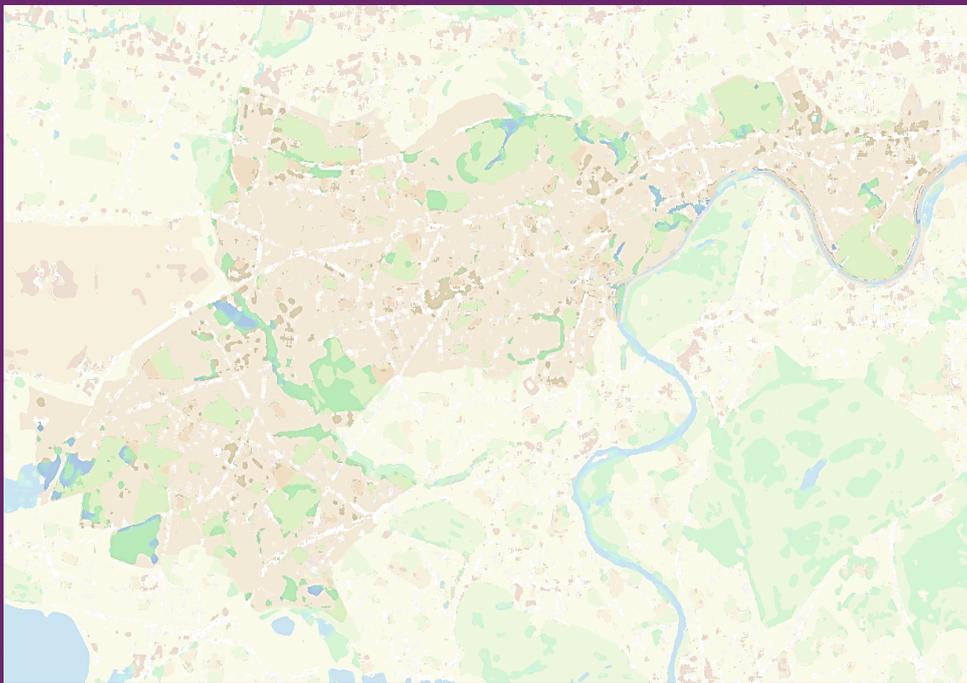
Enclosures:

1. Policy P2(c) Land at Hatton Fields
2. Modifications HLP_C2_36 and 27

HOUNSLOW LOCAL PLAN 2020 – 2041

Proposed Submission
Version (Regulation 19)

July, 2024



**London Borough
of Hounslow**

POLICY P2 (c): LAND AT HATTON FIELDS

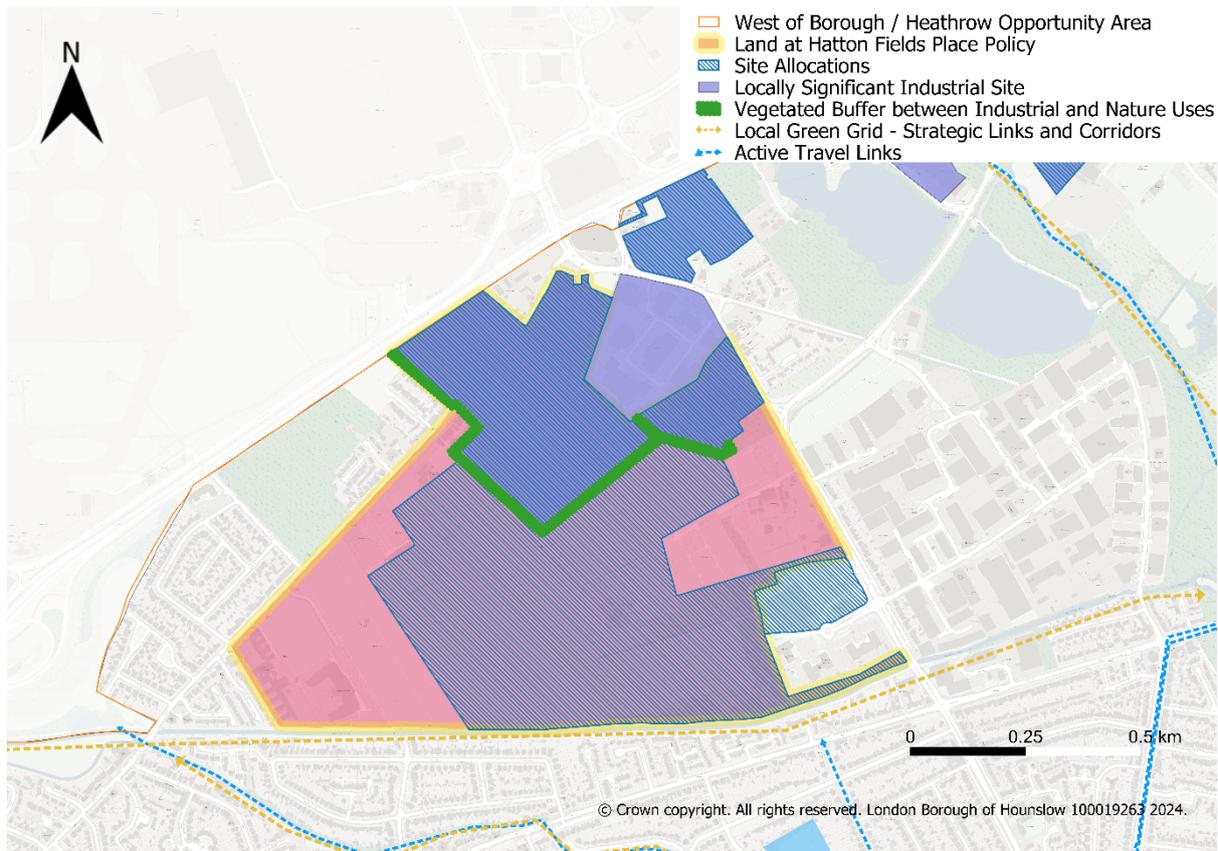


Fig P2.4: Land at Hatton Fields Place Policy

Our approach

The Council is making a selective and limited alteration to the green belt at Hatton Fields, to release land to help deliver the borough’s requirement for new industrial land during the plan period. 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.

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 open spaces.

The Council will expect development here to deliver significant benefits for local and borough residents, including by improving access to green spaces, sports and recreational facilities, enhancing the quality of key habitats on the land and contributing to compensatory improvements to existing green belt land.

Proposals should plan positively to deliver the place vision by:

- A. Delivering a logistics and industrial business park comprising 63,450sqm floorspace to the north of the site, combining modern warehousing with

- high quality infrastructure;
- B. Supporting the creation of a high-quality place that helps workers to make active lifestyle choices, including providing walking and cycling routes to surrounding areas and employee facilities to encourage social interaction amongst employees on site;
 - C. Creating a sense of place through the positioning of the industrial unit frontages and public realm;
 - D. Protecting and enhancing the landscape character, environmental quality and the biodiversity value of the adjacent Site of Importance for Nature Conservation and supporting the delivery of landscaping, a green buffer and tree planted margins along the boundaries with neighbouring open space to provide corridors for habitats;
 - E. Supporting and encouraging active lifestyles by improving access and connections to surrounding sports and recreational facilities and open spaces including the allotments, expanded Hatton Cemetery and the Hounslow Urban Farm and creating a new community nature zone to provide access improvements to nature and green spaces for local communities;
 - F. Enhancing the river corridors and the quality and condition of watercourses such as the River Crane, the Duke of Northumberland's River and the Longford River, in line with the Water Framework Directive objectives;
 - G. Contributing towards compensatory improvements to the environmental quality and accessibility of remaining Green Belt land and providing enhancements and extensions to habitats (including those within the SINC) to achieve a minimum 10% biodiversity net gain across the wider site;
 - H. Protecting the Hatton Meadows SINC and mitigating any impact in line with the mitigation hierarchy set out in the London Plan;
 - I. Complying with DfT circular 01/2010 (including any subsequent updates) regarding control of development in airport public safety zones;
 - J. Safeguarding the continued NATS air traffic control facility at Faggs Road as an essential part of the operation of Heathrow Airport, which includes ensuring an unimpeded line of sight to the operational radar located on the Airport as well as the microwave dish link connectivity to the Heathrow Control Tower which cannot be blocked by intervening development. Developers are required to consult NATS on any development proposals;
 - K. Ensuring that the scheme layout design adopts the principle of secure by design which will enhance night and morning security of this area;
 - L. Using existing constraints such as Public Safety zone for high quality landscape designs;
 - M. Creating well-defined streets and spaces with a network of safe and easily navigable pedestrian and cycle routes through the site to connect to Hatton Cross underground station, the Crane River Corridor, the Duke of Northumberland's River, Longford River and associated open spaces and East Bedfont via the bridge at Richmond Avenue which will minimise the need for new employees to travel by car;
 - N. Providing access and servicing roads that service the businesses and allow the safe, reliable, and efficient movement of freight;

O. Minimising the number of additional servicing and delivery trips whether through the use of Delivery and Servicing Plans, the use of new technology or provision of appropriate facilities.

CHAPTER 2 – SPATIAL STRATEGY *(including Vision, Objectives, Place Policies, Neighbourhood Visions etc)*

Modification code <i>e.g. [HLP_C2_01]</i>	Policy, Map/Figure	Paragraph/Clause	Page	Modification	Reason for modification
HLP_C2_36	P2 (c) Land at Hatton Fields	Figure P2.4	64	Amend 5 th item in the legend to remove the following wording shown in red: Vegetated Buffer between Industrial and Nature Uses	In response to representation from JCAL, and for clarification that the green buffer and planted tree margin will extend to the north of Hatton Road and east of Myrtle Avenue as shown in Figure P2.4
HLP_C2_37	P2 (c) Land at Hatton Fields	D	65	Protecting and enhancing the landscape character, environmental quality and the biodiversity value of the adjacent Site of Importance for Nature Conservation and supporting the delivery of landscaping, a green buffer and tree planted margins along the site boundaries with neighbouring open space to provide corridors for habitats;	In response to representation from JCAL, and for clarification that the green buffer and planted tree margin will extend to the north of Hatton Road and east of Myrtle Avenue as shown in Figure P2.4