

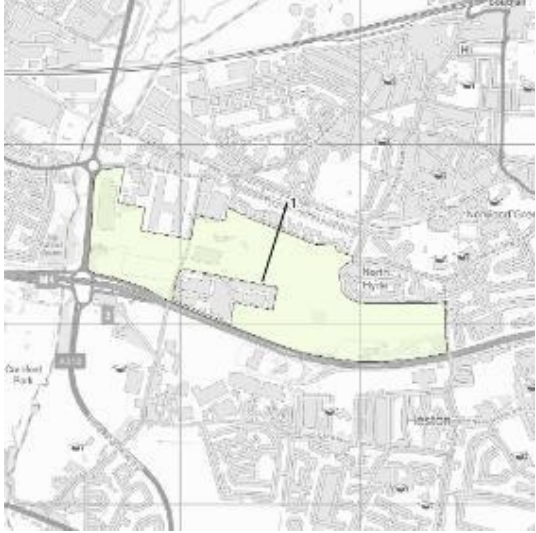
**London Borough of Hounslow Local Plan 2020-41:**  
**Green Belt Background Paper (incorporating**  
**Exceptional Circumstances Assessment)**  
**Annex Report: Area and Sub-Area Assessments**

**June 2025**

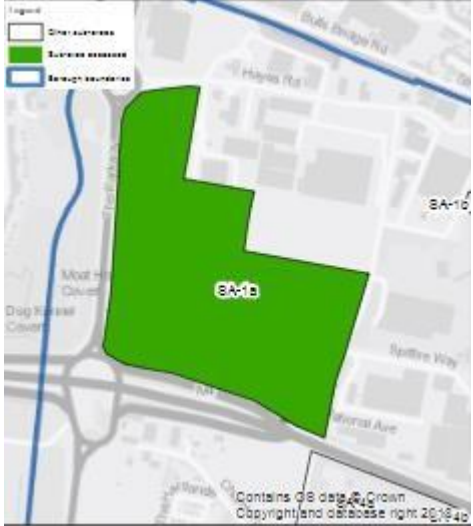
## GA1

GA1 was found to be one of the weakest contributing general areas in the Stage 1 assessment (see p59 of the Stage 1 main report and pages 1-2 of the Stage 1 Annex Report) and recommended for further consideration in its entirety at Stage 2.

In accordance with the methodology set out in Section 2 of the Stage 2 Green Belt Assessment, parcel GA1 was scrutinised further for its scope for developable land. At this stage, the land was not known to be available for development other than two parts of the GA found to be potentially available as emerging capacity sites (see Figure B1.1 of the Stage 2 report). These were classed as RA1A and RA1B (see Figure 2.3 and Table 2.1 on p15 of the Stage 2 report).

Green Belt Assessment parcel/sub-area references	GA1
Site area (ha)	84.3
	

## RA1A

Green Belt Assessment parcel/sub-area references	SA1A
Site area (ha)	22.2
	
<b>Outcome from Green Belt Assessment</b>	
<p>Moderate.  Recommended for further consideration.  In terms of assessing wider impact, the Stage 2 study notes that the sub-area is located on the borough boundary. Therefore, it says that if the sub-area is recommended for release, the impact on the neighbouring Green Belt would need to be considered.</p>	
<b>Is the area/sub-area developable?</b>	

✓

### Availability/Viability

The north-west of the sub-area principally accommodates the new wholesale market, which relocated from the current Costco site in 2008. The relocation of the Western International Market (WIM) onto Green Belt land took place as the importance of the market and the benefits of maintaining a presence in this location whilst upgrading the buildings was justified under the 'very special circumstances' test. This segment of the site is now built up, and the area has seen some further urbanisation, and an intensification of the uses in the vicinity. The parcel of land to the south of the WIM is open scrubland. This land is publicly owned and is available for development. The Viability Assessment shows that sites such as this could be viably developed at the point envisaged.

### Suitability

In terms of topography and landscape character, this is a mixed flat and undulating site with some urbanising influences. The landscape commentary in Stage 1 of the Green Belt Assessment characterised the sub-area as being of scrub landscape that is unmaintained and not open to the general public, and some of which has been developed.

Just to the north of the eastern segment of the sub-area is a site allocated for waste facilities in the West London Waste Plan 2015. Permission has been granted for a recycling facility on the western half of the site, and this has now been constructed.

The context generally is built-up and noisy and the land in the south is not publicly accessible and is semi-derelict green space. The topography and scale of the site would make it possible for the land here to accommodate development, and vehicular access into the site would be possible from the surrounding highways. Development would need to ensure that any contamination and historic landfill is considered and addressed.

Whilst the area is not protected for nature conservation it is an important part of the M4 corridor for wildlife which connects the Green Belt in the west with Osterley Park in the east. It is covered by an archaeological priority area for Cranford and Cranford Moat. A third runway at Heathrow would have the potential to introduce further constraints in the area were this project to proceed in the future.

The area would be unsuitable for housing but would be suitable for employment use, and the agglomeration effects of locating with an existing employment area would be a benefit, as the land here would provide access to the strategic road network and would provide a location in close proximity to Heathrow Airport. Some of the site is designated as a site for minerals safeguarding in the local plan. However, the plan states that such safeguarding will not necessarily preclude other forms of development, but establishes the presence of minerals resources. In the case of this site, any development could only take place following the minerals extraction and restoration of the land.

Residential development would not be suitable here, but the constraints identified not would affect the overall suitability for employment development, subject to regard being had to any Heathrow expansion plans and any constraints which may be introduced as a result.

**Overall, the Council considers that the area in the south of the parcel is developable for employment development, subject to meeting site requirements.**

### **Overall conclusion**

Part of this sub-area is already developed for the relocated market. The remainder is capable of contributing land providing a significant quantum of employment floorspace, which could make a major contribution towards meeting employment land requirements. The location of the site offers qualitative benefits – it is adjacent to existing employment and retail areas, it offers good access from the strategic road network and it is close to Heathrow Airport.


The Council acknowledges that the site meets Green Belt purposes moderately, but considers on balance that exceptional circumstances are demonstrated justifying Green Belt release of some of the land at this location, subject to any built development avoiding any harm to site constraints identified and meeting key requirements.

The Council considers that the southern portion of the sub-area could be released without harmful impact on the wider Green Belt, because of the following factors:

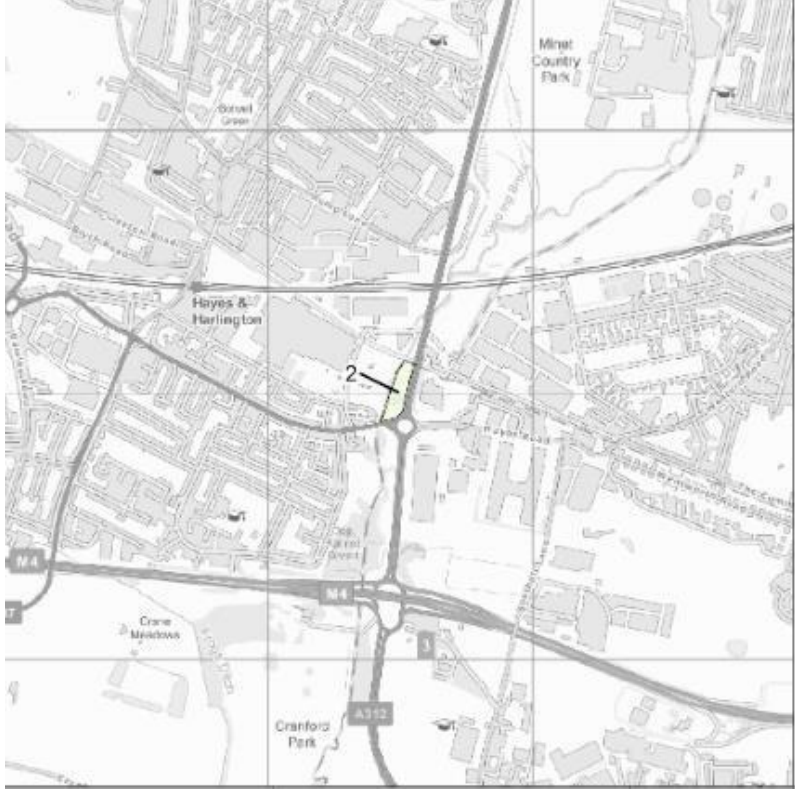
- (1) the stronger boundary which would result (as identified in the Arup study)
- (2) the maintenance of an adjacent area of Green Belt between the area released and the borough boundary, and
- (3) the fact that the area of Green Belt in the adjoining borough in closest proximity to this sub-area is itself very narrow.
- (4) providing a strong boundary in the form of a landscape buffer would be one of the key development requirements.

**On balance, the Council considers that exceptional circumstances are demonstrated justifying Green Belt release for some of the land at this location. The northeastern segment is already built up, but the Council considers that exceptional circumstances are demonstrated justifying Green Belt release in the southern portion of the sub-area, subject to development meeting site requirements.**


# RA1B

Green Belt Assessment parcel/sub-area references	RA1B
Site area (ha)	3.9
	
<p><b>Outcome from Green Belt Assessment</b></p>	
<p>Weakly performing. Recommended for further consideration.</p>	
<p><b>Is the area/sub-area developable?</b></p>	
<p>x SA1B constitutes a narrow strip of land occupied by a car park, children’s play area and landscaped green space. Given doubts over the suitability of developing this land and the insufficient certainty of the estate regeneration scheme which would be taking forward development here, it cannot currently be assessed to be available for development.</p>	
<p><b>Overall conclusion</b></p>	
<p>Not developable or judged as appropriate for MOL assessment in the Arup Stage 1 Report. Therefore <b>exceptional circumstances are not demonstrated for Green Belt release at this location.</b></p>	

## GA2


Green Belt Assessment parcel/sub-area references	GA2
Site area (ha)	1.3
	
<b>Outcome from Green Belt Assessment</b>	
Weakly performing.	
<b>Is the area/sub-area developable?</b>	
x GA found to be area of particular local value in Arup Stage 1 assessment (see Table 2.1 of the Stage 2 Study). Therefore, land not suitable for development and assessed for potential MOL designation.	
<b>Overall conclusion</b>	
General area is separated from the remainder of the general areas recommended as MOL by Arup, but is connected to the wider Green Belt at this location. <b>The Council therefore considers that, despite the Arup recommendation, this small parcel continues to meet Green Belt purposes and that exceptional circumstances are therefore not demonstrated to justify a change to the Green Belt boundary here.</b>	

## GA3


Green Belt Assessment parcel/sub-area references	GA3
Site area (ha)	4.5
	
<b>Outcome from Green Belt Assessment</b>	
Weakly performing	
<b>Is the area/sub-area developable?</b>	
x	
GA found to be area of particular local value in Arup Stage 1 assessment (see Table 2.1 of the Stage 2 Study). Therefore, land not suitable for development and assessed for potential MOL designation.	
<b>Overall conclusion</b>	
General area is separated from the remainder of the general areas recommended as MOL by Arup, but is connected to the wider Green Belt at this location. <b>The Council therefore considers that, despite the Arup recommendation, this small parcel continues to meet Green Belt purposes to a sufficient degree as to justify maintaining its designation, and that exceptional circumstances justifying removal from the Green Belt are not demonstrated here.</b>	

## GA4

At the Stage 1 assessment, GA4 was found to be making some contribution to the Green Belt but was capable of being subdivided into sub-areas using permanent, durable boundaries (see p53 and p59 of the Stage 1 main report and pages 7-8 of the Stage 1 Annex Report), with the identified sub-areas recommended for further consideration at Stage 2. The following assessments show the findings of this further consideration and overall recommendations.


Green Belt Assessment parcel/sub-area references	GA4
Site area (ha)	101.4
	

## RS-4

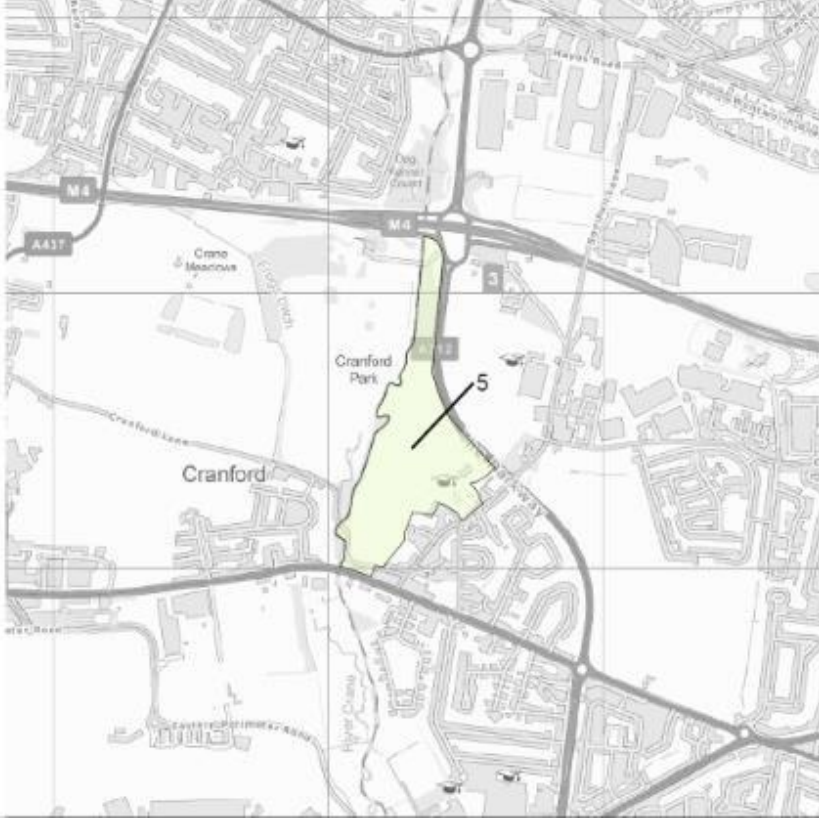
Green Belt Assessment parcel/sub-area references	SA 4A, B, C, D
Site area (ha)	29.1
	
<b>Outcome from Green Belt Assessment</b>	
<p>Moderate (SA-4C)/Weak (SA-4A, SA-4B and SA-4D).  Recommended for further consideration (as strategic cluster only for 4B and 4C; in isolation or in strategic cluster for 4A and 4D).</p>	
<b>Is the area/sub-area developable?</b>	
<p>x</p> <p>Land at SA4A is in predominantly recreational use (Heston Sports Ground) and therefore not suitable for development. Land at SAs 4C and 4D are not known to be available for development (Arup recommended SA4B should not be released in isolation).</p>	
<b>Overall conclusion</b>	

Not developable or judged as appropriate for MOL assessment in the Arup Stage 1 Report. Therefore **exceptional circumstances are not demonstrated for Green Belt release at this location.**


# RA4E

Green Belt Assessment parcel/sub-area references	SA4E
Site area (ha)	43.7
	
<p><b>Outcome from Green Belt Assessment</b></p>	
<p>Moderate. Recommended for further consideration.</p>	
<p><b>Is the area/sub-area developable?</b></p>	
<p>x This site is allocated in the local plan for minerals extraction and restored parkland (both of which are classed as not inappropriate development in the Green Belt in the NPPF as long as proposals preserve openness). The provision of parkland is required in order to alleviate open space deficiency in Cranford and Heston. As a result of the allocation, this sub-area cannot be considered suitable for development other than for the parkland</p>	
<p><b>Overall conclusion</b></p>	
<p>Not developable or judged as appropriate for MOL assessment in the Arup Stage 1 Report. Therefore <b>exceptional circumstances are not demonstrated for Green Belt release at this location.</b></p>	


## GA5

Green Belt Assessment parcel/sub-area references	GA5
Site area (ha)	25.2
	
<b>Outcome from Green Belt Assessment</b>	
Retain within the Green Belt. Not sub-divided or assessed again at Stage 2.	
<b>Is the area/sub-area developable?</b>	
N/a	
<b>Overall conclusion</b>	
<b>Exceptional circumstances not demonstrated for release of Green Belt.</b>	


## GA6

Green Belt Assessment parcel/sub-area references	GA6
Site area (ha)	13.6
	
<b>Outcome from Green Belt Assessment</b>	
Retain within the Green Belt. Not sub-divided or assessed again at Stage 2.	
<b>Is the area/sub-area developable?</b>	
N/a	
<b>Overall conclusion</b>	
<b>Exceptional circumstances not demonstrated for release of Green Belt.</b>	

## GA7


Green Belt Assessment parcel/sub-area references	GA7
Site area (ha)	5.3ha
	
<b>Outcome from Green Belt Assessment</b>	
Weakly performing.	
<b>Is the area/sub-area developable?</b>	
x	
GA found to be area of particular local value in Arup Stage 1 assessment (see Table 2.1 of the Stage 2 Study). Therefore, land not suitable for development.	
<b>Overall conclusion</b>	
Weakly performing Green Belt. Arup recommended that the majority of the parcel would fit the criteria for MOL designation. <b>However, following the inspectors' recommendation following the Stage 1 hearings, the Council is not proposing any redesignations to MOL. The Council notes, however, the recommendation of MOL designation in the assessment and the fact that, despite the conclusion over Green Belt performance being weak, that the parcel was found to be an area of particular local value in the Arup assessment. Therefore, the parcel is not considered suitable for development and the Council judges that there are no exceptional circumstances to justify Green Belt release.</b>	

# GA8

Green Belt Assessment parcel/sub-area references	GA8
Site area (ha)	32.2
	
<p><b>Outcome from Green Belt Assessment</b></p>	
<p>Weakly performing.</p>	
<p><b>Is the area/sub-area developable?</b></p>	
<p>x GA found to be area of particular local value in Arup Stage 1 assessment (see Table 2.1 of the Stage 2 Study). Therefore, land not suitable for development.</p>	
<p><b>Overall conclusion</b></p>	
<p>Weakly performing Green Belt – Arup recommended that the majority of the parcel would fit the criteria for MOL designation. <b>However, following the inspectors’ recommendation following the Stage 1 hearings, the Council is not proposing any redesignations to MOL. The Council notes, however, the recommendation of MOL designation in the assessment and the fact that, despite the conclusion over Green Belt performance being weak, that the parcel was found to be an area of particular local value in the Arup assessment. Therefore, the parcel is not considered suitable for development and the Council judges that there are no exceptional circumstances to justify Green Belt release. Regarding the exceptions, the Council agrees with the Arup recommendation that the areas in the south-</b></p>	

**east of the parcel (Ron Smith Recycling/Land adjacent to Central Park Trading Estate) should be subject to further consideration (see RC8), given that they have the potential to provide land for significant additional development.**

## RC8

Green Belt Assessment parcel/sub-area references	RA8B, 8C
Site area (ha)	7.3 (SA8B=3ha, SA8C=4.3ha)
	
<b>Outcome from Green Belt Assessment</b>	
<p>Weak.</p> <p>Recommended for further consideration (in isolation or combination)</p> <p>The Stage 2 assessment recommends that if either of these sub-areas were released (in isolation or in combination with the other), the new eastern and western boundaries would require strengthening to ensure they are readily recognisable and likely to be permanent. As the Council is proposing to release these two sub-areas in combination, this recommendation would only apply to the new western boundary (on the western boundary of sub-area SA8B).</p>	
<b>Is the area/sub-area developable?</b>	

✓

In terms of topography and landscape character, this is a mixed site of built development, a recycling yard and soft landscaping, which contributes to an urban managed feel.

Much of the land at sub-area SA8B (Ron Smith Recycling, or St Albans Farm) is previously-developed land, in use as a recycling area. This site has been subject to enforcement regarding unauthorised development. The Council considers that regularising the site's planning permission (to include scope for continuing waste uses alongside other industrial uses) would offer the opportunity to improve the environment of the site, which it considers would be a planning benefit, and which could provide additional employment land. This is an existing waste management site, as listed in the West London Waste Plan, and is therefore subject to Policy WLWP2 of the waste plan, which states that that development for non-waste uses will only be considered on land in existing waste management use if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Borough.

The remainder of the land in this combined parcel (including the majority of the land at sub-area SA8C, bordering onto the adjacent Central Park Trading Estate) is open land but not publicly accessible. Part of the land falls within Flood Zone 2, where the flooding sequential test is required – however, given that employment uses are classed as less vulnerable, this enables the flooding exceptions test to be passed.

The topography and size of the sub-areas mean it would be possible for them to accommodate development, and vehicular access would be possible from adjacent highways. Development would need to ensure that any contamination and historic landfill is considered and addressed. There are a number of TPOs on SA8C, which any development would need to take consideration of. The sub-area lies adjacent to the Crane Corridor SINC (of metropolitan importance).


It is available for development but is suitable for employment use only given neighbouring land uses, subject to consideration of site constraints. The Viability Assessment shows that sites such as this could be viably developed at the point envisaged.

**Overall, the Council considers that the area is developable for employment development subject to meeting development requirements.**

**Overall conclusion**

Weakly performing Green Belt – **the Council considers that the suitability of land at RC-8 for employment development represents exceptional circumstances justifying removal of this sub-areas from the Green Belt for employment development, subject to meeting site requirements.**


## GA9

Green Belt Assessment parcel/sub-area references	GA9
Site area (ha)	24.2
	
<b>Outcome from Green Belt Assessment</b>	
Weakly performing.	
<b>Is the area/sub-area developable?</b>	
<p>x</p> <p>GA found to be area of particular local value in Arup Stage 1 assessment (see Table 2.1 of the Stage 2 Study). Therefore, land not suitable for development . Some of the GA is part of a designated SINC (the Crane Corridor SINC).</p>	
<b>Overall conclusion</b>	
<p>Weakly performing Green Belt – Arup recommended that the majority of the parcel would fit the criteria for MOL designation. <b>However, following the inspectors’ recommendation following the Stage 1 hearings, the Council is not proposing any redesignations to MOL. The Council notes, however, the recommendation of MOL designation in the assessment and the fact that, despite the conclusion over Green Belt performance being weak, that the parcel was found to be an area of particular local value in the Arup assessment. Therefore, the parcel is not considered suitable for development and the Council judges that there are no exceptional circumstances to justify Green Belt release.</b></p>	


## GA10

GA10 was found to be one of the weakest contributing general areas in the Stage 1 assessment (see p59 of the Stage 1 main report and pages 22-24 of the Stage 1 Annex Report) and recommended for further consideration in its entirety at Stage 2.

In accordance with the methodology set out in Section 2 of the Stage 2 Green Belt Assessment, parcel GA10 was scrutinised further for its scope for developable land. At this stage, the land was found not to be available for development (or for some parts of the parcel, not suitable for development due to the presence of policy constraints), other than one part of the GA found to be potentially available as an emerging capacity site (see Figure B1.1 of the Stage 2 report) (and not subject to policy constraints). This was classed as RA10A (see Figure 2.3 and Table 2.1 on p16 of the Stage 2 report).

Green Belt Assessment parcel/sub-area references	GA10
Site area (ha)	20.5
	

## RA10A

Green Belt Assessment parcel/sub-area references	SA10A
Site area (ha)	4.5
	
<b>Outcome from Green Belt Assessment</b>	
<p>Moderate.  Recommended for further consideration.  The Stage 2 site assessment states that if the sub-area was released, it would result in the designation of a weaker Green Belt boundary than the existing inner Green Belt boundary. It therefore recommends that the new boundary would require strengthening to ensure it is readily recognisable and likely to be permanent.</p>	
<b>Is the area/sub-area developable?</b>	
<p>✓</p> <p><u>Availability/Viability</u>  The site is privately-owned and is available for development. The Viability Assessment shows that sites such as this could be viably developed at the point envisaged.</p> <p><u>Suitability</u>  In terms of topography and landscape character, this is a predominantly flat subarea with limited views to the wider countryside and several urbanising influences. The landscape commentary in Stage 1 of the Green Belt Assessment characterised the area as providing connective and ecological corridors and being open private land which provides little benefits in defining the surrounding conurbations.  A series of planning permissions have granted at Tyburn House, in the west of the sub-area, for the erection of a new office and warehouse building to replace existing buildings on the site, with the most recent permission being issued in</p>	

December 2019 (planning application reference: P/2019/3402). Permission was granted on the grounds that the impact on the openness of the Green Belt would improve as a result of the development, as the new buildings would have a significantly lower footprint than the existing.

The land within this sub-area is undeveloped pasture land. There are a number of TPOs on the site, which any development would need to take consideration of. The presence of nearby properties would mean consideration would need to be had to avoiding harmful impact on residential amenity. The topography and scale of the site would make it possible for the land here to accommodate development, and vehicular access into the site would be possible from the surrounding highways. Development would need to ensure that any contamination and historic landfill is considered and addressed.

The Crane Corridor SINC lies immediately to the east, and Heathrow Airport lies just beyond the Great South West Road, to the west.

Hatton Cross station on the Piccadilly Line is to the north west of the site across the Great South West Road.

Residential development would not be suitable here, but the constraints identified not would affect the overall suitability for employment development, subject to regard being had to site constrains. **Overall, the Council considers that the area is developable for employment development subject to meeting site requirements.**

#### **Overall conclusion**

The site has the potential to accommodate significant additional employment floorspace, making a significant contribution to meeting the borough's identified requirements for such development.

The site has good accessibility, and has the potential to become part of a logistics hub adjacent to Heathrow Airport, handling air cargo and freight in a highly accessible location that benefits from excellent road connections with the airport, the national motorway network and London's strategic road network. Other light industrial businesses can also be accommodated.

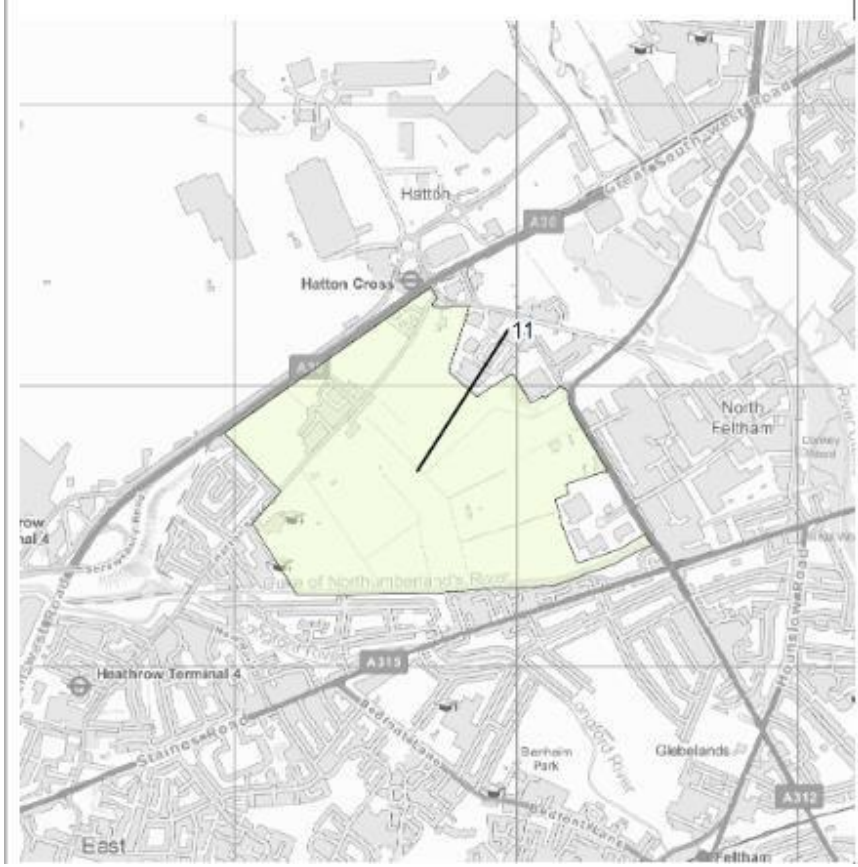
It would therefore meet the need for employment development in a qualitative sense as well as quantitative.

**The Council acknowledges that the site meets Green Belt purposes moderately, but considers on balance that exceptional circumstances are demonstrated justifying Green Belt release at this location, subject to any built development meeting site requirements.**

# GA11

GA11 was found to be making some contribution to the Green Belt in the Stage 1 assessment but was capable of being subdivided into sub-areas using permanent, durable boundaries (see p53 and p59 of the Stage 1 main report and pages 25-27 of the Stage 1 Annex Report), with the identified sub-areas recommended for further consideration at Stage 2. At Stage 2, part of the identified sub-divided area was not reassessed due to the presence of a major policy constraint (the Public Safety Zone – see Figure B1.2 in the Stage 2 Report). The eastern segment of this sub-area (which was subject to the constraint) was assessed for its suitability for MOL designation as SA11A, and the western segment was assessed further as SA11B.

The remaining area in the southern portion of GA11 had been identified at Stage 1 as making some contribution to the Green Belt and recommended for retention (see Table 6.3 in p55-56 of the Stage 1 report). However, emerging capacity sites were identified in the sub-area as being potentially available (see Figure B1.1 of the Stage 2 report). These formed the majority of this sub-area, and the whole of the sub-area was therefore reassessed as SA11C (see Figure 2.3 and Table 2.1 on p16 of the Stage 2 report).

Green Belt Assessment parcel/sub-area references	GA11
Site area (ha)	93.6
	

# GA11 (RC11 & SA11A)

Green Belt Assessment parcel/sub-area references	SA11A, B & C
Site area (ha)	93.6



## Outcome from Green Belt Assessment

Arup recommends that RC-11 (11B and 11C) is Moderate/Weak. Recommended for further consideration in combination (11B and 11C). Recommends that if SA11C was released in combination with SA11B, it would result in a stronger Green Belt boundary than the existing inner Green Belt boundary for SA11C and a similar strength boundary compared to the existing boundary for SA11B. Sub-area 11A was not assessed further for release due to the presence of the public safety zone. It was assessed instead for MOL designation and found not to be suitable for classification as MOL. Stage 1 assessment found that GA11 did not meet purposes 1 and 2, but that the area retained a uniquely rural character and a strong level of openness, despite being relatively constrained by development and being poorly linked to the wider Green Belt, and therefore contributed to Purpose 3. It found that the area north of Hatton Road (SA11A) had a greater level of fragmentation due to residential developments breaking up the openness of the Green Belt here.

**Is the area/sub-area developable?**

✓

Availability/Viability

The GA is part-owned by the Council and part-owned by private companies. A significant portion of the parcel is available for development. The Viability Assessment shows that sites such as this could be viably developed at the point envisaged.

Suitability

In terms of topography and landscape character, this is a large site which is generally flat, with longer distance views across different land uses and surrounding built form. There are no clear views to the wider countryside and there are several urbanising influences, but the scale of the sub-area adds to the sense of openness. The landscape commentary in Stage 1 of the Green Belt Assessment characterised the area as open agricultural land with historic field pattern boundaries.

The majority of the land in this area is greenfield land used as pasture, informal playing fields or left in a natural state. The land to the south of Hatton Road is largely open in nature, though it contains many land uses, including an urban farm, cemetery, school, some allotments and sports facilities. The northern part of the site is partly residential, partly open land and partly within the Public Safety Zone related to Heathrow (the area also includes the landing approach lights for aircraft on the final approach to the runway). The northern part of the site is within the inner noise contours related to Heathrow Airport.

Two parts of the area contain former landfill sites, and an air traffic control facility takes up a small plot in the centre of the site. Development would need to ensure that any contamination and historic landfill is considered and addressed.

The topography and scale of the site would make it possible for the land here to accommodate development, and vehicular access into the site would be possible from the surrounding highways to parts of the site. Consideration would need to be had to avoiding harmful impact on residential amenity.

There is some public access through the site, concentrated mainly in the south. A public footpath runs from Hatton Road in the north along the western boundary of the allotments where it crosses the Duke of Northumberland's River and connects to Richmond Avenue. Another path runs east along the northern bank of the Duke

of Northumberland's River to Faggs Road.

Much of the land in the southern portion of the sub-area is designated as a borough-grade SINC (grade I) (Hatton Meadows), which is one of the few remaining examples of original pasture land to be found in Hounslow borough. It contains acid grassland, hedge, scrub and semi-improved neutral grassland. There is also a SINC of local importance in the north-western corner of the sub-area – Cain's Lane. This is an area of scrub and rough grassland and includes hedges, scattered trees, scrub and semi-improved grassland. The site is also adjacent to the Duke of Northumberland's River at Bedfont SINC. This section of the river has good water quality and supports a range of aquatic invertebrates.

The northern part of the site is both within the Public Safety Zone and the inner noise contours related to Heathrow Airport. This is likely to impose limitations on the developability of this portion of the land parcel. However, it is also noted that the PSZ has reduced in size since the time of the Green Belt Assessment. The Council also acknowledges that some forms of development, such as storage uses, are capable of being developed within PSZs. It therefore considers that this designation does not rule out this area being released from the Green Belt.

Much of the site is designated as a site for minerals safeguarding in the local plan. However, the plan states that such safeguarding will not necessarily preclude other forms of development, but establishes the presence of minerals resources. It states that safeguarded sites are not required to deliver the borough's seven-year supply and may not be suitable for extraction, but that safeguarding ensures that future planning decisions consider their mineral resource.

Given the conclusions of the Green Belt Assessment and the open space/biodiversity assets present on this sub-area, it would be important that development proposals protect and enhance the landscape character, environmental quality and the biodiversity value of the SINC and support the delivery of landscaping, a green buffer and tree planted margins along the boundaries with neighbouring open space to provide corridors for habitats. Any development would be subject to the biodiversity net gain (BNG) requirements of the Environment Act 2021. Given the biodiversity assets present, it is considered that a significant proportion of this should be delivered on-site - this would also be consistent with the Council's green infrastructure and ecological conservation objectives, as set out in the Green and Blue Infrastructure Strategy and associated Nature Recovery Action Plan. It is considered that this would most effectively be delivered through the creation of a community nature zone in the southern and central portion of the site, and that this would offer the chance to improve the condition of the habitats present, and provide improved public access to nature and green spaces.

Residential development would not be suitable in this area, due to noise impacts, but the Council considers that the constraints present would not undermine the overall suitability for employment development in the northern portion of the parcel. All sites with a formal open space function should be protected (including possible expansion of the cemetery). Safeguarded minerals status does not rule out the developability of the land.

**Overall, the Council considers that the northern portion of the area is developable for employment development subject to meeting site requirements**

## **Overall conclusion**

The Employment Land Review finds that there are significant requirements for additional employment land and also that this demand is for land close to Heathrow Airport, from businesses in the logistics and transport sectors which are closely linked to activities at the airport. This is therefore not land which can be delivered anywhere, but needs to be in close proximity to Heathrow with convenient access to the strategic road network.

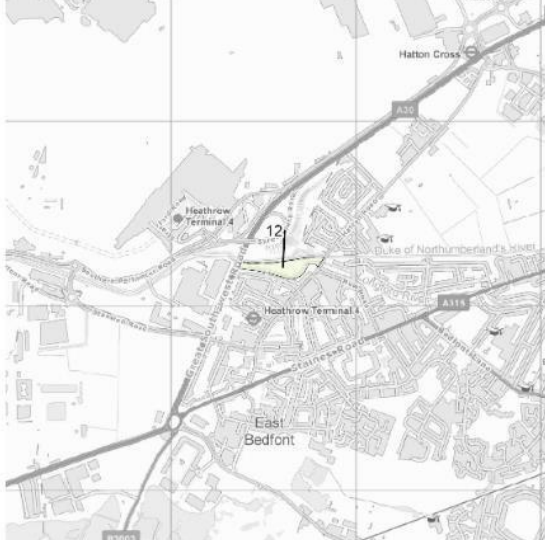
The site has the potential to accommodate significant additional employment floorspace, making a strategic contribution to meeting the borough's identified requirements for such development. Its location near to Heathrow Airport and the strategic road network means that it would be capable of accommodating an industrial park which would provide space for businesses for which proximity to the airport is essential. It would therefore make a significant contribution to meeting the borough's identified need for employment development in a qualitative sense as well as quantitative.

The Council acknowledges that the site meets Green Belt purposes moderately, but also notes that the Green Belt Assessment has recommended RC11 for further consideration and has found SA11C to be moderately-performing in Green Belt terms.

In relation to sub-area 11A, the Council notes that the Stage 1 Green Belt assessment found that this area had a greater level of fragmentation. It also notes that the area of the PSZ has now reduced in size since the Green Belt Assessment was carried out. The Council also acknowledges that some forms of development, such as storage uses, are capable of being developed within PSZs. It therefore considers that this designation does not rule out this area being released from the Green Belt.


Taking all these factors into account, the Council considers that exceptional circumstances are demonstrated justifying some area of Green Belt release across the area of GA11 for employment development, subject to any built development meeting requirements in relation to site constraints. The area for release, however, is likely to be limited due to the presence of biodiversity assets and the objective to deliver a community nature zone (which reflects the Council's objectives to enhance green infrastructure and ecological conservation), and due to the statutory requirements of the Environment Act 2021 in relation to Biodiversity Net Gain. This means that a significant proportion of the required habitat enhancement/creation will need to be delivered on-site, thereby limiting the area for release for employment development. It is intended that this would be delivered on the part of the land which is designated as a SINC (Borough Importance, grade I). Releasing a limited area of land for development would also enable the creation of a community nature zone on the land, which would help deliver the objectives of the Council's Green and Blue Infrastructure Strategy and associated Nature Recovery Action Plan in relation to enhanced green infrastructure and ecological conservation. In particular, this could deliver improvements and extensions to the habitats on the site and provide improved public access to nature and green spaces for local communities. Overall, the council considers that the area of release should be confined to the northern portion of the parcel, and the remainder of the land here should remain within the Green Belt.

## GA12

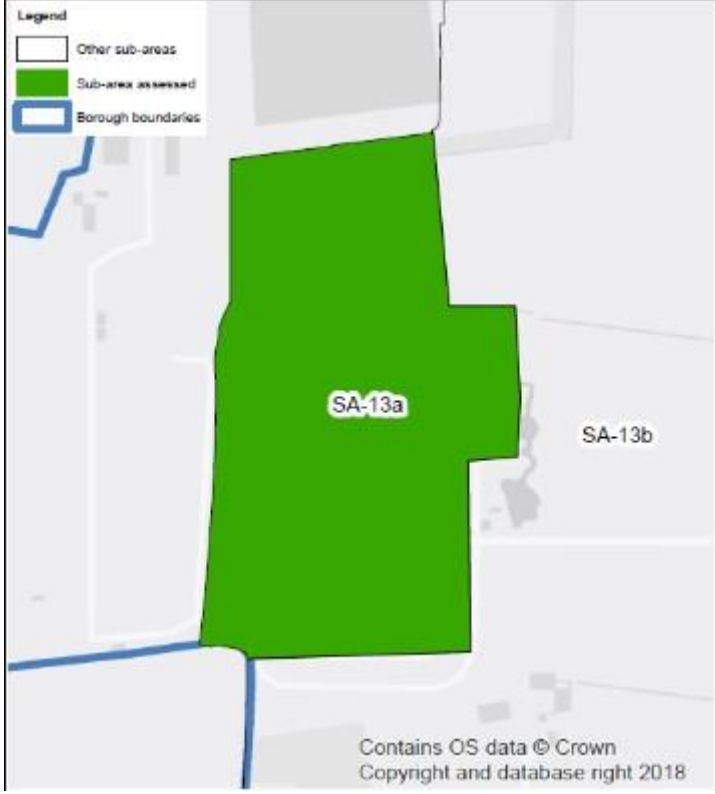
Green Belt Assessment parcel/sub-area references	GA12
Site area (ha)	2.7
	
<b>Outcome from Green Belt Assessment</b>	
Weakly performing. May be best served by an alternative designation.	
<b>Is the area/sub-area developable?</b>	
x Land not available (isolated grazing land owned by the Environment Agency) Land not suitable for development due to small size of site, SINC designation and proximity to two watercourses meaning land is prone to flooding.	
<b>Overall conclusion</b>	
Weakly-performing Green Belt. However, land not suitable or available for development. Therefore, the Council considers that <b>exceptional circumstances are not demonstrated justifying removal of land from the Green Belt.</b>	

## GA13

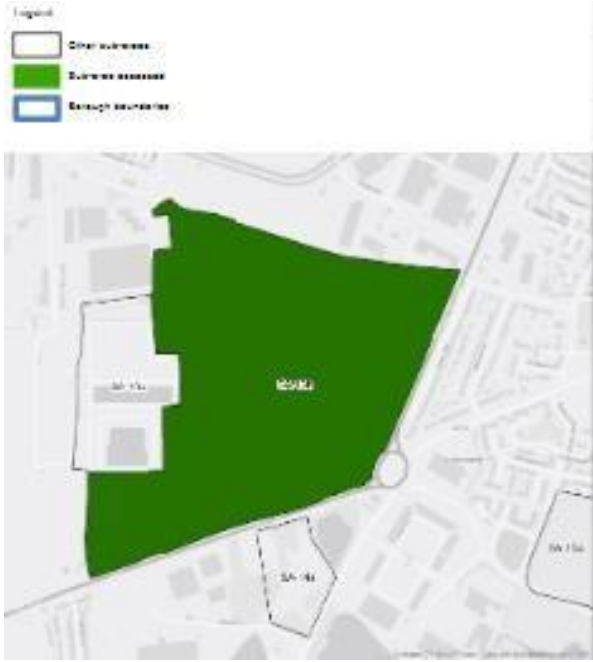
GA13 was found to be making some contribution to the Green Belt in the Stage 1 assessment (see p59 of the Stage 1 main report and pages 31-32 of the Stage 1 Annex Report). However, the parcel was assessed as part of the NPPF reassessment following the Landscape Appraisal at Stage 1B of the assessment (see Table 6.3 of the Stage 1 report on p56), and this recommended that a boundary amendment be considered further at Stage 2, at a sub-area west of the water works boundary. This was classed as SA13A. In addition to this, an emerging capacity site was identified for the remainder of GA13 as being potentially available (see Figure B1.1 of the Stage 2 report). This was classed as SA13B (see Figure 2.3 and Table 2.1 on p16 of the Stage 2 report for both SA13A and SA13B).

Green Belt Assessment parcel/sub-area references	GA13
Site area (ha)	53.2
	

## SA13A

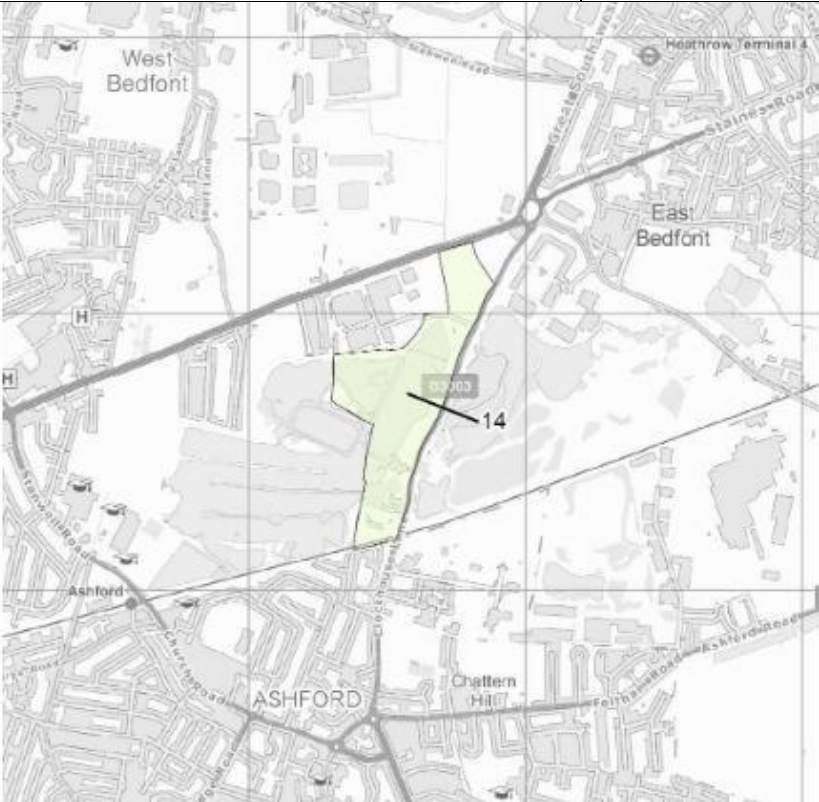
Green Belt Assessment parcel/sub-area references	SA13A
Site area (ha)	8.7
	
<b>Outcome from Green Belt Assessment</b>	
Strongly performing. Not recommended for further consideration.	
<b>Is the area/sub-area developable?</b>	
N/a	
<b>Overall conclusion</b>	
<b>Exceptional circumstances not demonstrated for release of Green Belt.</b>	

## SA13B


Green Belt Assessment parcel/sub-area references	SA13B
Site area (ha)	44.6
	
<b>Outcome from Green Belt Assessment</b>	
Strongly performing. Not recommended for further consideration.	
<b>Is the area/sub-area developable?</b>	
n/a	
<b>Overall conclusion</b>	
<p>Whilst acknowledging the recommendation from the Arup study, the Council previously considered that the sub-area should be assessed for its contribution to sustainable development and its developability to further appraise whether exceptional circumstances exist justifying the release of this land from the Green Belt. This was on the basis that the area was considered a potentially sustainable location for a major mixed-use development in the event that strategic transport infrastructure was provided to serve the site. At that time, there was a reasonable possibility that such infrastructure would be provided, such that the Council considered that there was a justification for removing the land and safeguarding it for future development following the provision of this transport connectivity. However, the Council now considers that the provision of strategic transport infrastructure to serve the site is no longer a possibility in the plan period or foreseeable future. Therefore, it does not consider that there are exceptional circumstances for removing the land from the Green Belt.</p>	

## GA14

GA14 was found to be making some contribution to the Green Belt in the Stage 1 assessment (see p59 of the Stage 1 main report and pages 33-34 of the Stage 1 Annex Report). However, an emerging capacity site was identified for the northern segment of the parcel as being potentially available (see Figure B1.1 of the Stage 2 report). This was classed as SA14A (see Figure 2.3 and Table 2.1 on p16 of the Stage 2 report).


Green Belt Assessment parcel/sub-area references	GA14
Site area (ha)	24.3
 A map showing the location of site GA14 in Ashford, UK. The site is highlighted in light green and labeled '14'. It is situated between West Bedford and East Bedford to the north, and Ashford and Chatten Hill to the south. Major roads like Staines Road and Ashford Road are visible. Heathrow Terminal 1 is also marked in the north-east. The map includes a grid and various geographical features like buildings and green spaces.	

## SA14A


Green Belt Assessment parcel/sub-area references	SA14A
Site area (ha)	3.6
<p>Legend</p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid black; background-color: white; margin-right: 5px;"></span> Other sub-areas</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: green; margin-right: 5px;"></span> Sub-area assessed</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 2px solid blue; margin-right: 5px;"></span> Borough boundaries</li> </ul> 	
<b>Outcome from Green Belt Assessment</b>	
Moderately performing. Not recommended for further consideration.	
<b>Is the area/sub-area developable?</b>	
N/a	
<b>Overall conclusion</b>	
<b>Exceptional circumstances not demonstrated for release of Green Belt.</b>	

## GA15

At the Stage 1 assessment, GA15 was found to be making some contribution to the Green Belt but was capable of being subdivided into sub-areas using permanent, durable boundaries (see p53 and p59 of the Stage 1 main report and pages 35-37 of the Stage 1 Annex Report), with the identified sub-areas recommended for further consideration at Stage 2. The following assessments show the findings of this further consideration and overall recommendations.

Green Belt Assessment parcel/sub-area references	GA15
Site area (ha)	107.1
	


## RS15

Green Belt Assessment parcel/sub-area references	SA15A, B, C, D, E and F
Site area (ha)	53.6
	
<b>Outcome from Green Belt Assessment</b>	
<p>Moderate (SAs 15A, 15B, 15C)/Weak (SAs 15D, 15E and 15F).  Recommended for further consideration (15B, C, D and F as strategic cluster only and 15A and 15E in isolation or as a strategic cluster).</p>	
<b>Is the area/sub-area developable?</b>	
<p>N/a?</p> <p><b>The Council can currently meet its housing targets on previously-developed sites, and so Green Belt land is not required to meet the local plan housing requirement. The Council therefore considers that exceptional circumstances are not demonstrated to justify releasing land here from the Green Belt.</b></p>	
<b>Overall conclusion</b>	


**The Council can currently meet its housing targets on previously-developed sites, and so Green Belt land is not required to meet the local plan housing requirement. The Council therefore considers that exceptional circumstances are not demonstrated to justify releasing land here from the Green Belt.**

## GA16

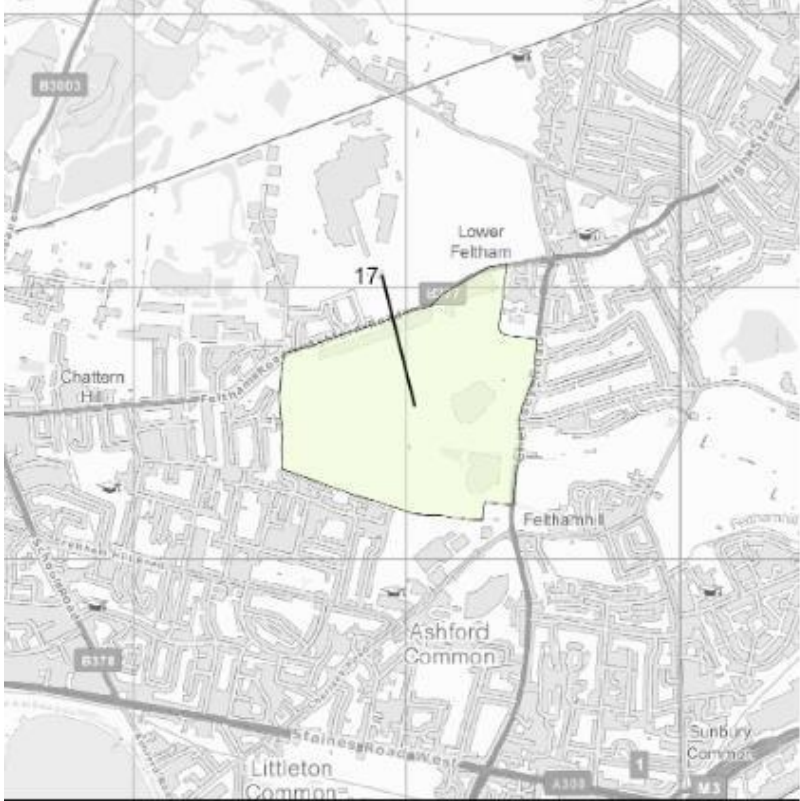
At the Stage 1 assessment, GA16 was found to be making some contribution to the Green Belt but was capable of being subdivided into sub-areas using permanent, durable boundaries (see p53 and p59 of the Stage 1 main report and pages 38-40 of the Stage 1 Annex Report), with the identified sub-area recommended for further consideration at Stage 2. The following assessment shows the findings of this further consideration and overall recommendations.

Green Belt Assessment parcel/sub-area references	GA16
Site area (ha)	94.6
	

## RA16A

Green Belt Assessment parcel/sub-area references	SA16A
Site area (ha)	11.5
	
<b>Outcome from Green Belt Assessment</b>	
Moderate. Recommended for further consideration.	
<b>Is the area/sub-area developable?</b>	
<p>N/a</p> <p><b>The Council can currently meet its housing targets on previously-developed sites, and so Green Belt land is not required to meet the local plan housing requirement. The Council therefore considers that exceptional circumstances are not demonstrated to justify releasing land here from the Green Belt.</b></p>	
<b>Overall conclusion</b>	
<p><b>The Council can currently meet its housing targets on previously-developed sites, and so Green Belt land is not required to meet the local plan housing requirement. The Council therefore considers that exceptional circumstances are not demonstrated to justify releasing land here from the Green Belt.</b></p>	


## GA17

Green Belt Assessment parcel/sub-area references	GA17
Site area (ha)	60.3
	
<b>Outcome from Green Belt Assessment</b>	
Retain within the Green Belt. Not sub-divided or assessed again at Stage 2.	
<b>Is the area/sub-area developable?</b>	
N/a	
<b>Overall conclusion</b>	
<b>Exceptional circumstances not demonstrated for release of Green Belt.</b>	


## GA18

GA18 was found to be one of the weakest contributing general areas in the Stage 1 assessment (see p59 of the Stage 1 main report and pages 43-44 of the Stage 1 Annex Report), and recommended for further consideration in its entirety at Stage 2.

The Council disagreed with this conclusion and considered that the GA should be retained in the Green Belt (see Table 2.1 of the Stage 2 report). However, an emerging capacity site was identified in the northern segment of the parcel as being potentially available (see Figure B1.1 of the Stage 2 report). This was classed as SA18A (see Figure 2.3 and Table 2.1 on p16-17 of the Stage 2 report), and subject to a further assessment.


Green Belt Assessment parcel/sub-area references	GA18
Site area (ha)	1.7
	

## SA18A


Green Belt Assessment parcel/sub-area references	SA18A
Site area (ha)	0.9
	
<b>Outcome from Green Belt Assessment</b>	
Moderately performing. Recommended for further consideration.	
<b>Is the area/sub-area developable?</b>	
N/a (given the Council's conclusion on Green Belt performance – see 'Overall conclusion' section).	
<b>Overall conclusion</b>	
<p>The Council notes the Arup finding that the sub-area performs a moderate role in relation to preventing sprawl. It also notes that the sub-area is connected to the wider Green Belt at this location, with the Green Belt stretching over the borough boundary into Spelthorne and providing a link between two much larger areas which are fulfilling Green Belt purposes. <b>The Council therefore considers that, despite the Arup recommendation, this parcel continues to meet Green Belt purposes, and that exceptional circumstances justifying removal from the Green Belt are not demonstrated here.</b></p>	

## GA19

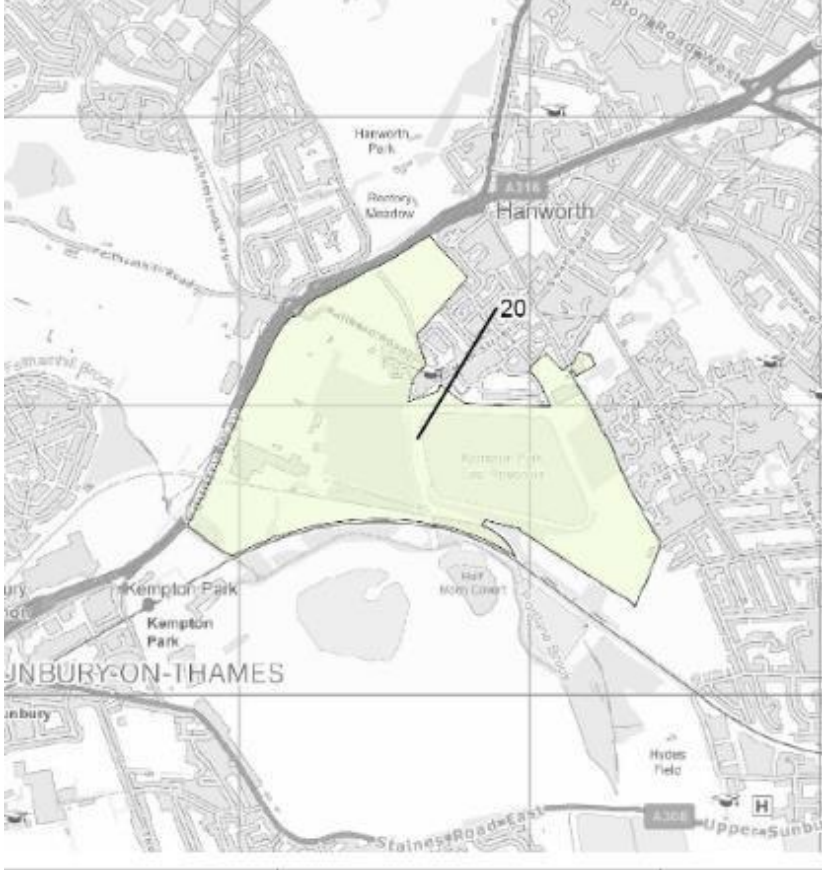
At the Stage 1 assessment, GA19 was found to be making some contribution to the Green Belt but was capable of being subdivided into sub-areas using permanent, durable boundaries (see p53 and p59 of the Stage 1 main report and pages 45-47 of the Stage 1 Annex Report), with the identified sub-area recommended for further consideration at Stage 2. The following assessment shows the findings of this further consideration and overall recommendations.

Green Belt Assessment parcel/sub-area references	GA19
Site area (ha)	80.1
	


## RA19A

Green Belt Assessment parcel/sub-area references	SA19A
Site area (ha)	13.3
	
<b>Outcome from Green Belt Assessment</b>	
Moderately performing. Recommended for further consideration.	
<b>Is the area/sub-area developable?</b>	
x Land is largely a Council-managed open space (Ludlow Road Nature Reserve and Open Space) and is therefore not suitable or available for development.	
<b>Overall conclusion</b>	
<b>Exceptional circumstances not demonstrated for release of Green Belt.</b>	

## GA20

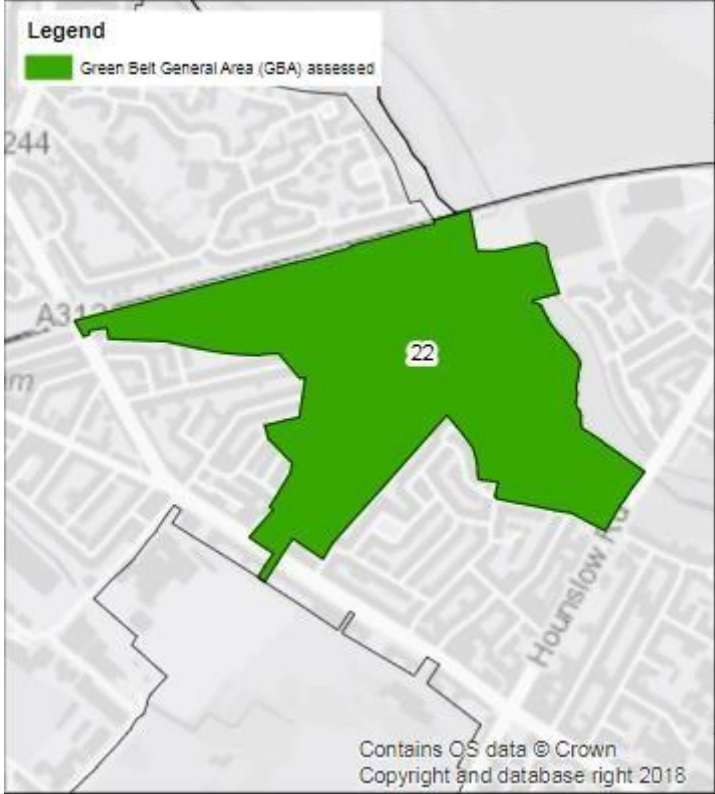
Green Belt Assessment parcel/sub-area references	GA20
Site area (ha)	95.6
	
<b>Outcome from Green Belt Assessment</b>	
Retain within the Green Belt. Not sub-divided or assessed again at Stage 2 (potential sub-division identified but not recommended to take this forward).	
<b>Is the area/sub-area developable?</b>	
N/a	
<b>Overall conclusion</b>	
<b>Exceptional circumstances not demonstrated for release of Green Belt.</b>	

## GA21

Green Belt Assessment parcel/sub-area references	GA21
Site area (ha)	77.3
	
<b>Outcome from Green Belt Assessment</b>	
Weakly performing.	
<b>Is the area/sub-area developable?</b>	
<p>x</p> <p>GA found to be area of particular local value in Arup Stage 1 assessment (see Table 2.1 of the Stage 2 Study). Therefore, land not suitable for development</p> <p>Some of the GA is part of a designated SINC (the Hanworth Park, Longford River &amp; De Brome Playing Fields SINC).</p>	
<b>Overall conclusion</b>	

Weakly performing Green Belt – Arup recommended that the majority of the parcel would fit the criteria for MOL designation. **However, following the inspectors' recommendation following the Stage 1 hearings, the Council is not proposing any redesignations to MOL. The Council notes, however, the recommendation of MOL designation in the assessment and the fact that, despite the conclusion over Green Belt performance being weak, that the parcel was found to be an area of particular local value in the Arup assessment. Therefore, the parcel is not considered suitable for development and the Council judges that there are no exceptional circumstances to justify Green Belt release.**

## GA22

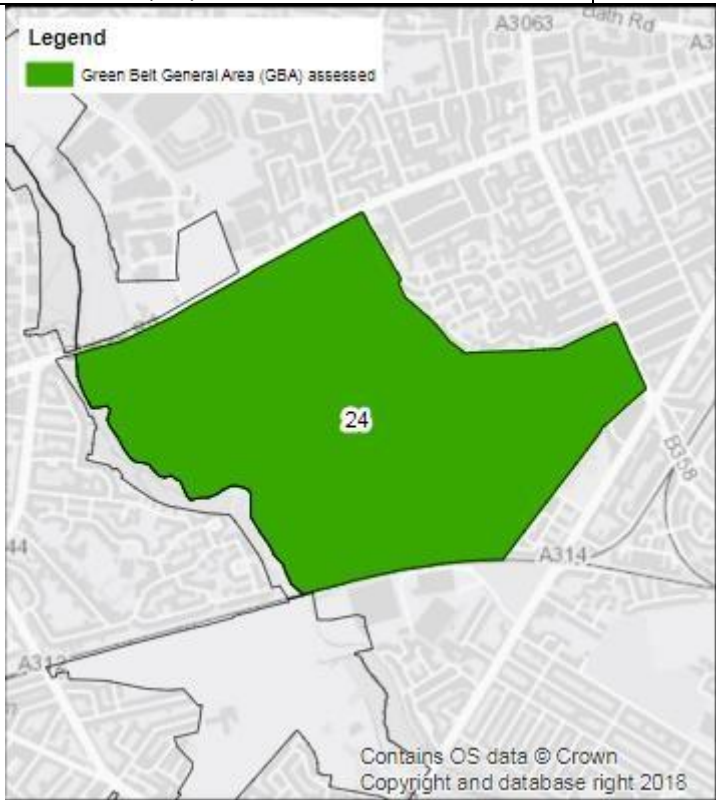
Green Belt Assessment parcel/sub-area references	GA22
Site area (ha)	47.7
	
<b>Outcome from Green Belt Assessment</b>	
Weakly performing.	
<b>Is the area/sub-area developable?</b>	
<p>x</p> <p>GA found to be area of particular local value in Arup Stage 1 assessment (see Table 2.1 of the Stage 2 Study). Therefore, land not suitable for development. Some of the site is part of three separate designated SINC's (the Feltham Marshalling Yards SINC, the Hanworth Park, Longford River and De Brome Playing Fields SINC and the Crane Corridor SINC), and part of the GA is a local nature reserve (the Pevensey Road LNR).</p>	
<b>Overall conclusion</b>	

Weakly performing Green Belt – Arup recommended that the majority of the parcel would fit the criteria for MOL designation. **However, following the inspectors' recommendation following the Stage 1 hearings, the Council is not proposing any redesignations to MOL. The Council notes, however, the recommendation of MOL designation in the assessment and the fact that, despite the conclusion over Green Belt performance being weak, that the parcel was found to be an area of particular local value in the Arup assessment. Therefore, the parcel is not considered suitable for development and the Council judges that there are no exceptional circumstances to justify Green Belt release.**

## GA23

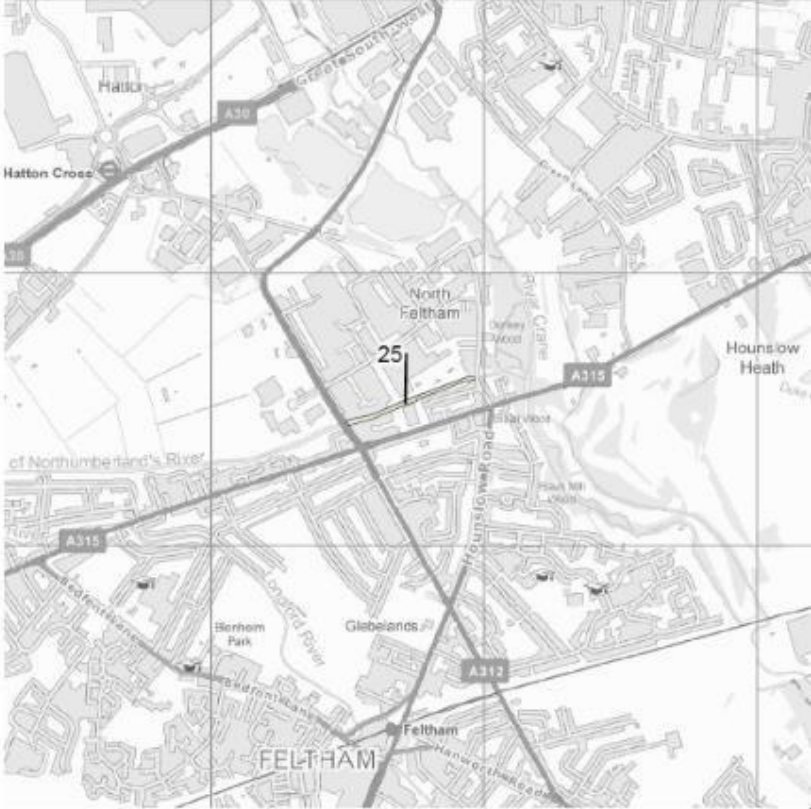
Green Belt Assessment parcel/sub-area references	GA23
Site area (ha)	7.9
<b>Outcome from Green Belt Assessment</b>	
Weakly performing.	
<b>Is the area/sub-area developable?</b>	
<p>x</p> <p>GA found to be area of particular local value in Arup Stage 1 assessment (see Table 2.1 of the Stage 2 Study). Therefore, land not suitable for development. The GA is a designated SINC (part of the Crane Corridor SINC).</p>	
<b>Overall conclusion</b>	
<p>Weakly performing Green Belt – Arup recommended that the parcel would fit the criteria for MOL designation. <b>However, following the inspectors’ recommendation following the Stage 1 hearings, the Council is not proposing any redesignations to MOL. The Council notes, however, the recommendation of MOL designation in the assessment and the fact that, despite the conclusion over Green Belt performance being weak, that the parcel was found to be an area of particular local value in the Arup assessment. Therefore, the parcel is not considered suitable for development and the Council judges that there are no exceptional circumstances to justify Green Belt release.</b></p>	

## GA24

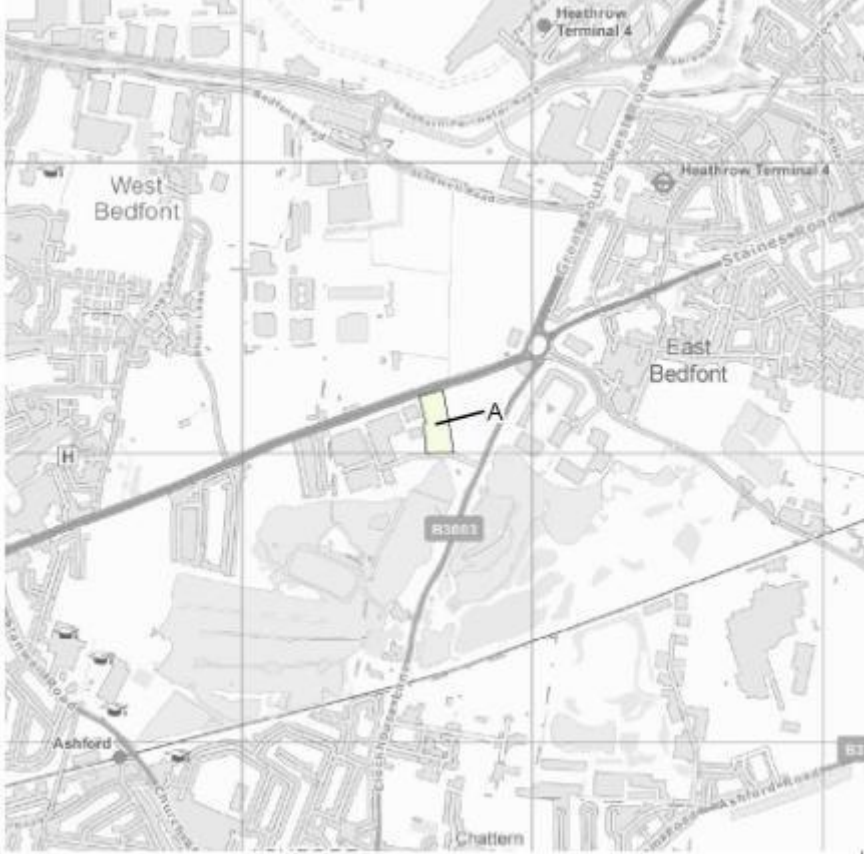
Green Belt Assessment parcel/sub-area references	GA24
Site area (ha)	139.2
	
<b>Outcome from Green Belt Assessment</b>	
Weakly performing.	
<b>Is the area/sub-area developable?</b>	
<p>x</p> <p>GA found to be area of particular local value in Arup Stage 1 assessment (see Table 2.1 of the Stage 2 Study). Therefore, land not suitable for development. Some of the GA is a designated SINC (Hounslow Heath SINC) and a local nature reserve.</p>	
<b>Overall conclusion</b>	

Weakly performing Green Belt – Arup recommended that the majority of the parcel would fit the criteria for MOL designation. **However, following the inspectors' recommendation following the Stage 1 hearings, the Council is not proposing any redesignations to MOL. The Council notes, however, the recommendation of MOL designation in the assessment and the fact that, despite the conclusion over Green Belt performance being weak, that the parcel was found to be an area of particular local value in the Arup assessment. Therefore, the parcel is not considered suitable for development and the Council judges that there are no exceptional circumstances to justify Green Belt release.**

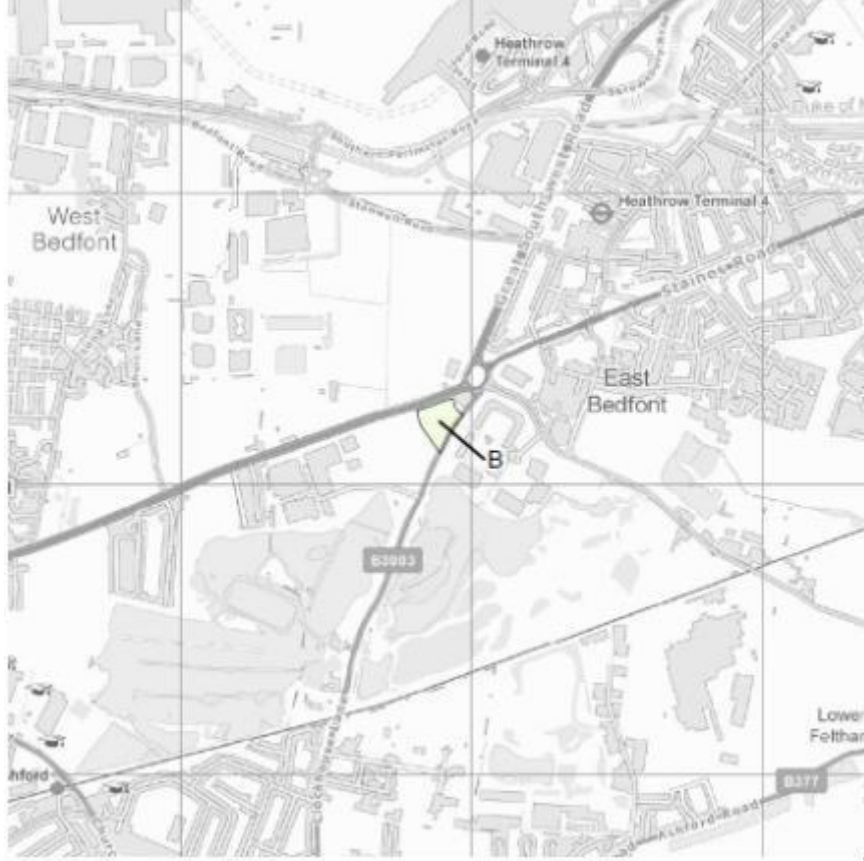
## GA25

Green Belt Assessment parcel/sub-area references	GA25
Site area (ha)	0.7
	
<p><b>Outcome from Green Belt Assessment</b></p> <p>Weakly performing but the landscape is an example of a green and ecological corridor and its particular landscape value should be considered further.</p>	
<p><b>Is the area/sub-area developable?</b></p> <p>x</p> <p>Land is not suitable for development as it is a narrow strip of river and river bank.</p>	
<p><b>Overall conclusion</b></p> <p>Weakly-performing Green Belt. However, land not suitable or available for development. Therefore the Council considers that <b>exceptional circumstances are not demonstrated justifying removal of land from the Green Belt</b></p>	

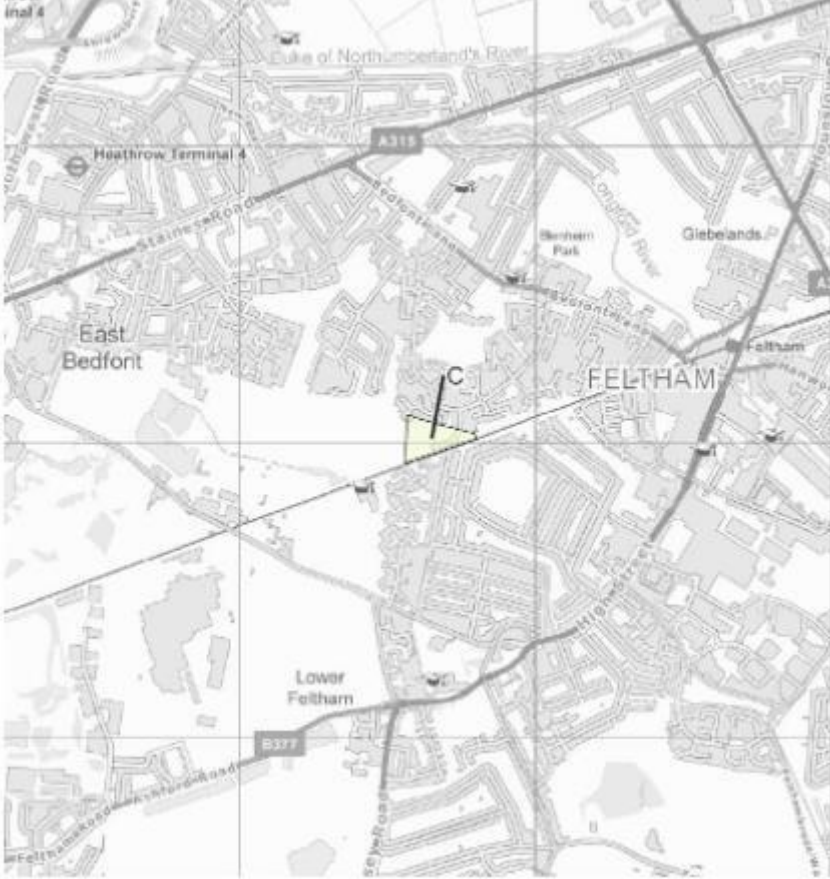
## Area A

Green Belt Assessment parcel/sub-area references	Area A
Site area (ha)	1.8
	
<b>Outcome from Green Belt Assessment</b>	
Do not add to the Green Belt – planning permission was granted for storage and distribution warehouse and offices in April 2013.	
<b>Is the area/sub-area developable?</b>	
N/a	
<b>Overall conclusion</b>	
Not recommended to be added to the Green Belt. <b>The Council accepts this recommendation.</b>	

## Area B

Green Belt Assessment parcel/sub-area references	Area B
Site area (ha)	1.6
	
<b>Outcome from Green Belt Assessment</b>	
Consider adding to the Green Belt	
<b>Is the area/sub-area developable?</b>	
N/a	
<b>Overall conclusion</b>	
Hotel being developed on this site. Therefore, <b>it is not considered appropriate to add this area to the Green Belt.</b>	

## Area C

Green Belt Assessment parcel/sub-area references	Area C
Site area (ha)	2.1
	
<b>Outcome from Green Belt Assessment</b>	
Consider adding to the Green Belt (although the Green Belt Assessment gave it a moderate score only against one of the Green Belt purposes, and a weak score against purposes 1 and 2).	
<b>Is the area/sub-area developable?</b>	
N/a	
<b>Overall conclusion</b>	
Given the small size of the parcel, the results of the assessment against purposes as described above, and the fact that it is already protected by SINC status, it is not considered that there are exceptional circumstances to add this parcel to the Green Belt.	