

London Borough of Hounslow Local Plan 2020-41:

**Green Belt Background Paper (incorporating
Exceptional Circumstances Assessment)**

June 2025

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1. Introduction and Context

- 1.1 This background paper is one of a series to accompany the submission version of the Hounslow Local Plan. It provides an overview of the Green Belt Assessment, which was commissioned by the council, and sets out the exceptional circumstances justifying alterations to the Green Belt boundary which are being taken forward in the plan.
- 1.2 The Green Belt in Hounslow occupies 1219ha of land in the west of the borough. It occupies land to the east of Heathrow airport, along the M4 and A4 corridors, open land surrounding Feltham and along the Crane Corridor, and on the southwestern fringes of the borough between Feltham and Spelthorne borough.

Figure 1: The Hounslow Green Belt

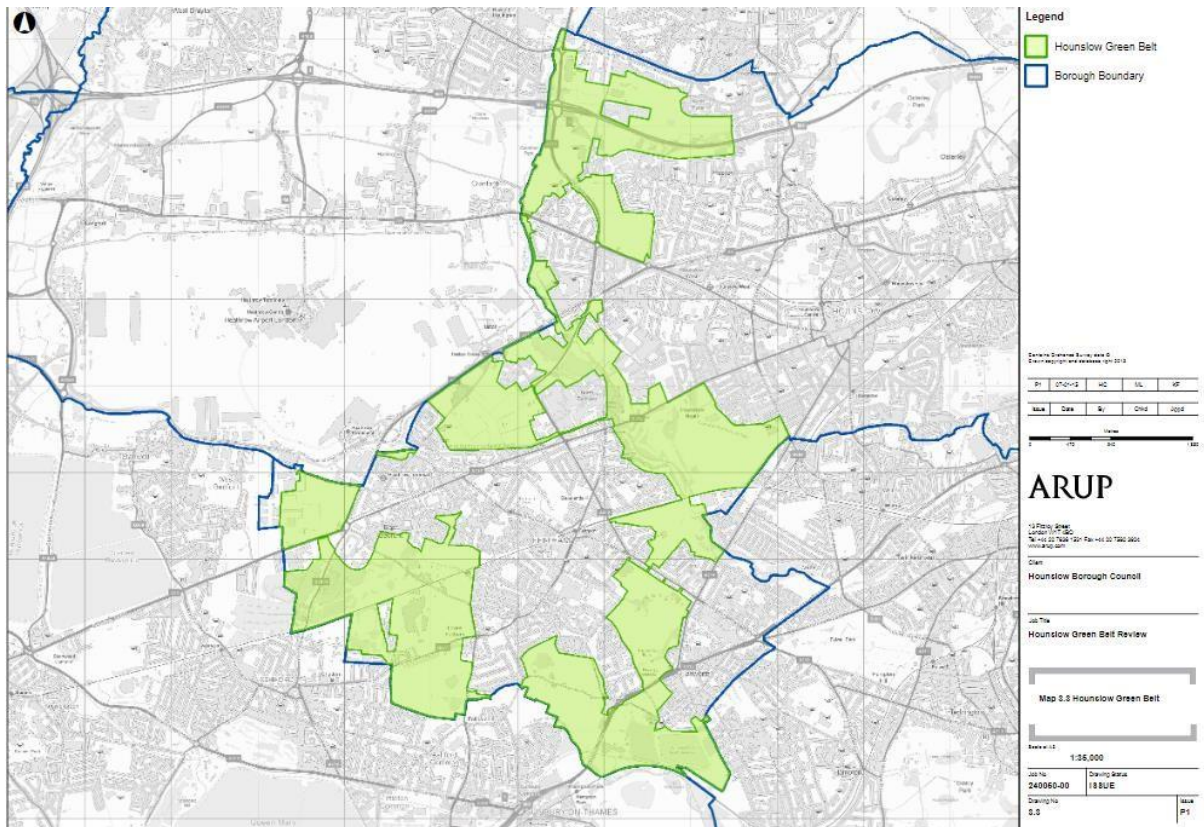
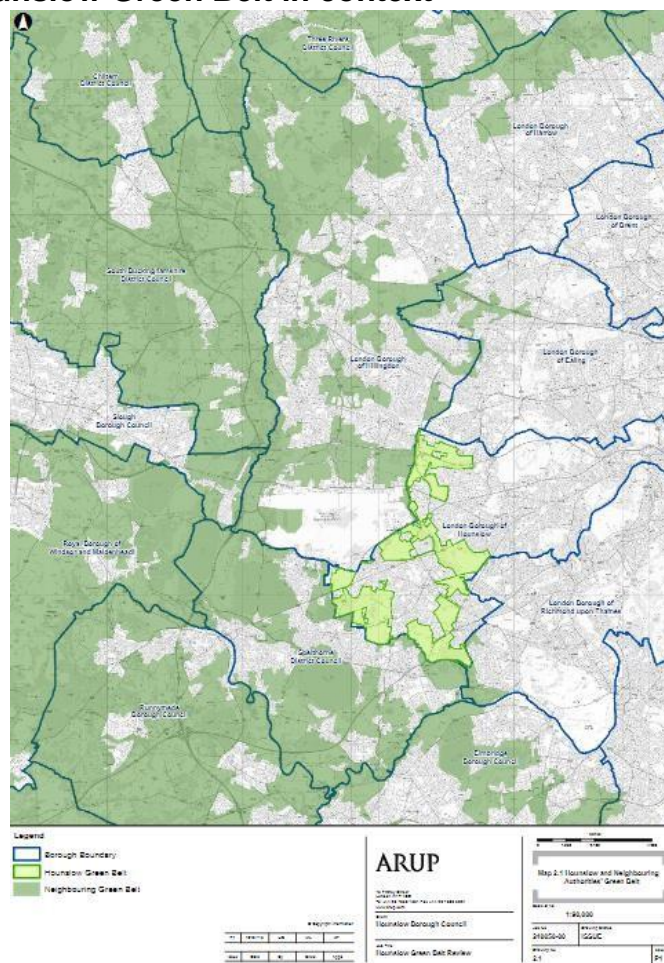


Figure 2: The Hounslow Green Belt in context



Overview of the Green Belt in Hounslow

- 1.3 The Green Belt in London was first defined in the middle of the 20th century following concerns over the impact of urban sprawl, and these concerns were seen in Hounslow with the Great West Road becoming an area of ribbon development and the extension of railway and tram corridors encouraging development deeper into the borough. The Green Belt in London was set by Patrick Abercrombie in the Greater London Plan of 1944.
- 1.4 Hounslow’s Green Belt was first defined in 1956 with the adoption of the Middlesex County Plan, and the boundaries were then adopted by the London Borough of Hounslow on its formation in 1965. A comprehensive review of the Green Belt was undertaken in 1986 which resulted in some major changes to the boundary in the West Area Local Plan in 1989: 25 sites were added to the Green Belt and 23 sites removed. A smaller number of amendments were taken forward in the borough’s 1996 Unitary Development Plan following a review in 1991. The 2003 UDP contained no Green Belt changes and a boundary audit in 2012 was not

implemented but instead fed into the Arup Green Belt Assessment when it was commissioned in 2015.

- 1.5 Since the inception of the Green Belt in the 1950s, the wider planning context has changed significantly. The most obvious example of this is the presence of Heathrow Airport, the world's busiest international airport. Whilst being situated in the neighbouring borough of Hillingdon, the airport perimeter boundary straddles the boundary of Hounslow, including stretches where it is immediately opposite areas of Green Belt land in Hounslow. More generally, its physical scale and economic impact mean that its spatial importance, both as a driver for growth and development patterns as well as a generator of significant environmental impacts, is hard to overestimate.
- 1.6 Heathrow Airport was still a recently-opened airport at the time of the initial definition of the Green Belt in Hounslow. Even the time which has elapsed since the last comprehensive review of the Green Belt boundaries in the 1980s has seen further significant growth of Heathrow and the businesses and industries that support its operations in this area. UK Civil Aviation Authority data shows that the number of passengers handled at the airport doubled between 1991 and 2018, and that the tonnage of cargo handled increased almost threefold in the same period. This period has also seen major demographic change, with London's population increasing from 6.4 million in 1991 to just under 8.2 million in 2011. Hounslow's population has also increased, from 196,602 in 1991 to 253,957 in 2011.
- 1.7 Some of the aviation-related and other industrial operations located in the area are sited in close proximity to Green Belt boundaries. Some of these developments are located between different areas of Green Belt. Examples of such locations are the North Feltham Trading Estate, Radius Park, Heathrow International and Ascot Road. These estates are home to businesses such as FedEx, Air Canada, Kuehne & Nagel and Do & Coe Airline Catering. Some of these estates were parcels removed from the Green Belt in the 1986 review, indicating the pressures for development even as far long ago as the 1980s. But growth pressures have clearly shown further growth in the intervening period since that time, as the figures above show.
- 1.8 For a full outline of the history of the Green Belt in Hounslow, see section 3 of the Stage 1 report. Overall, the Arup study found that much of the Green Belt land in Hounslow is playing an important role in preventing the outward sprawl of London and the emerging of Greater London with settlements in neighbouring Surrey, which retain a particular 'countryside' character. The study outlines sub-parcels which play a weaker or more moderate role in meeting the NPPF Green Belt purposes.

2. Planning policy context for green belt policy

National policy context

- 2.1 The Hounslow Local Plan has been prepared and submitted against the national policy context of the National Planning Policy Framework (NPPF) 2023. This version of the framework was published in December 2023, and although a revised

version of the NPPF was issued in 2024, the transitional arrangements outlined in the latter document mean that this local plan is still to be assessed against the 2023 version.

National Planning Policy Framework (2023)

2.2 Chapter 13 of the 2023 version of the framework sets out the government's approach to the Green Belt. Paragraph 142 states that the government "attaches great importance" to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts, it says, are their openness and their permanence. Paragraph 143 of the framework says the Green Belt serves the following five purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.3 Paragraph 145 of the 2023 framework states that, once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. However, it adds that authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. It states that strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

2.4 Paragraph 146 states that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully "all other reasonable options" for meeting its identified development needs. This, it says, will be assessed through the examination of its strategic policies, including whether the strategy:

- Makes as much use as possible of suitable brownfield sites and underutilised land;
- Optimises the density of development in line with the policies in chapter 11, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

2.5 Paragraph 144 of the framework states that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which

has been previously developed and/or is well-served by public transport, the NPPF says.

- 2.6 They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, it adds (in para 147).
- 2.7 Paragraph 85 of the 2023 framework states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 86 says planning policies should, among other things, set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth; and set criteria, or identify strategic sites, for local and inward investment to march the strategy and to meet anticipated needs over the plan period.

Revised NPPF (December 2024)

- 2.8 As stated above, the revised version of the NPPF was published in December 2024, with a new policy approach on Green Belts outlined, including the introduction of the concept of 'grey belt'. Supporting planning practice guidance on this topic was issued in February 2025, which expounds on the approach to assessing the Green Belt under the new policy.
- 2.9 Whilst the 2024 framework applies to planning applications, the Hounslow Local Plan continues to be assessed against the 2023 version of the framework, and this background paper has been written with this context in mind.

Planning Policy for Traveller Sites (December 2024)

- 2.10 Planning Policy for Traveller Sites, published in 2015 and updated in 2024, sets out that traveller sites are inappropriate development in the Green Belt. It states that if a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. It says that, if land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.

Strategic planning context: The London Plan (March 2021)

- 2.11 The latest version of the London Plan was published in March 2021, and constitutes the spatial development strategy for London. It is the overall strategic plan for London, and Boroughs' local development documents have to be 'in general conformity' with the London Plan, which is also legally part of the development plan.
- 2.12 The London Plan sets ten-year housing targets for the boroughs, and states that for the period beyond this, boroughs should draw on the 2017 SHLAA findings and any local evidence of identified capacity, and take into account any additional capacity that could be delivered as a result of any committed transport infrastructure

improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.

- 2.13 Policy E4 of the London Plan (Land for industry, logistics and services to support London's economic function) states that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained. This, it says, should take into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution.
- 2.14 Policy G2 (London's Green Belt) says the Green Belt should be protected from inappropriate development. It states that exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan. Policy G3 gives Metropolitan Open Land the same status and level of protection as Green Belt. Land is appropriate for MOL where it meets at least one of the following criteria:
- It contributes to the physical structure of London by being clearly distinguishable from the built-up area;
 - It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
 - It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value;
 - It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

The Local Plan Strategy

- 2.15 The Hounslow Local Plan was adopted in 2015, and Policy GB1 of the plan states that the Council "will protect and enhance Green Belt and Metropolitan Open Land to maintain its openness, quality and permanence." It says this will be achieved by, amongst other things, establishing a Green Belt boundary, to ensure that it is strong and permanent, and establishing the extent of Metropolitan Open Land in line with the Mayor of London's designation.
- 2.16 In this context, Hounslow Council commissioned consultants Arup to carry out a Green Belt Assessment. The purpose of the study was to test the current performance of the Borough's designated Green Belt against the five purposes set out in the NPPF.
- 2.17 The role of this report is to consider the findings of the Green Belt Assessment, and to consider the exceptional circumstances for Green Belt boundary changes.
- 2.18 The spatial approach taken forward in the local plan reviews is led by both national policy and by the 2021 London Plan.
- 2.19 Overall, the strategy is to meet the ten-year housing targets in the London Plan and the capacity-based approach for the post-ten year period. It is also to provide new allocations to meet the various requirements for employment land (as set out in the latest Employment Land Review) as much as possible without compromising sustainability considerations or other objectives of the plan.

3. Overview of Green Belt Assessment and Methodology for Exceptional Circumstances Assessment

The Stage 1 Green Belt Assessment

- 3.1 In September 2014, Hounslow Council commissioned consultants Arup to conduct a Stage 1 review of the borough's Metropolitan Green Belt, with a brief to test the current performance of the borough's designated Green Belt against the five purposes set out in the NPPF; and provide the basis for a Stage 2 assessment which would be a more detailed, study of particular sub-areas.
- 3.2 The final study, published in April 2015, provided:
- A desktop review of the policy framework on Green Belts and experience elsewhere of Green Belt Reviews;
 - An outline of the history of the Hounslow Green Belt;
 - A methodology for assessing the Hounslow Green Belt; and
 - Key findings, assessments, conclusions and recommendations.
- 3.3 In terms of the history of Hounslow's Green Belt, the study pointed to the key landmarks being the Green Belt being first defined in Hounslow in 1956 and the last comprehensive review being carried out in the 1980s.
- 3.4 In terms of the methodology for the study, in order to apply a consistent approach to assessing different part of the Green Belt, the study divided the Hounslow Green Belt into different parcels, or 'general areas' (GAs) (see Maps 4.1 and 4.2 of the study). These were defined according to key natural and man-made boundaries, and in particular the following:
- the M4 motorway
 - A and B roads
 - railway lines
 - the River Crane.

Figure 3: Defining features for General Areas

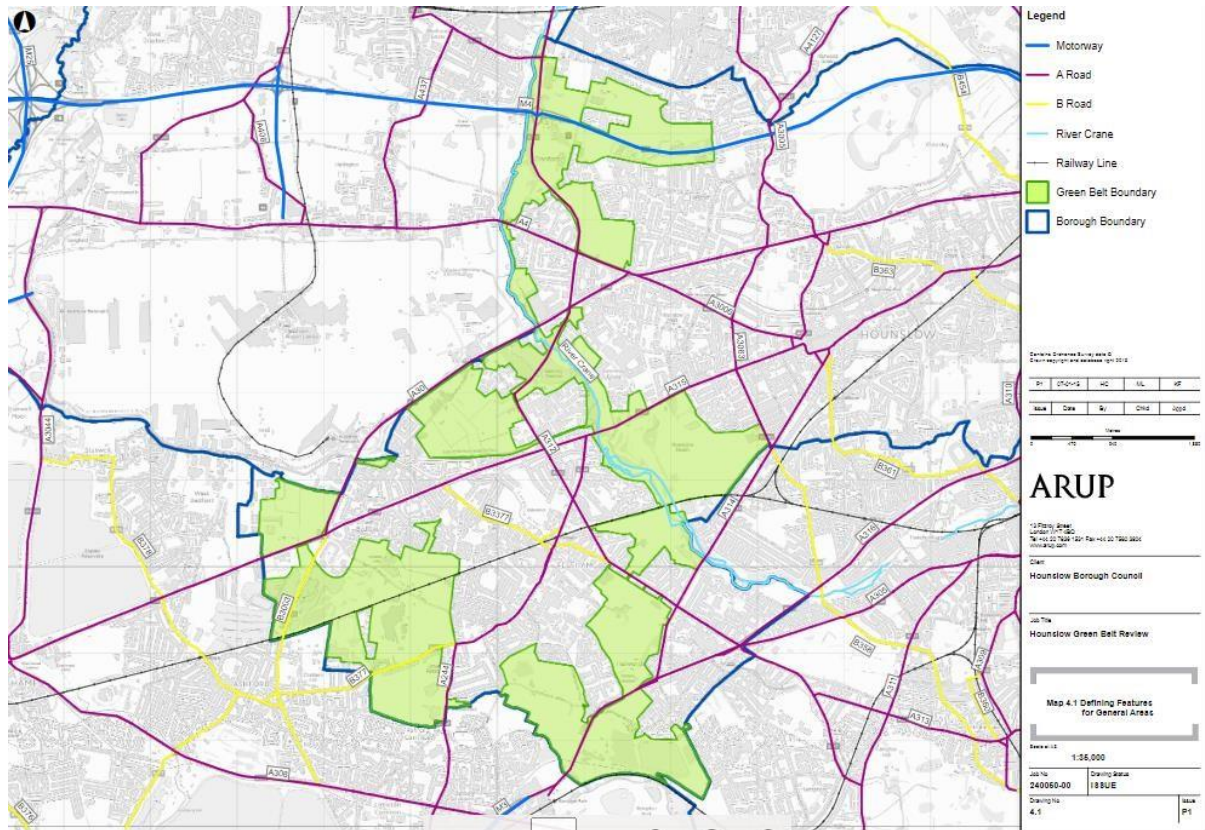
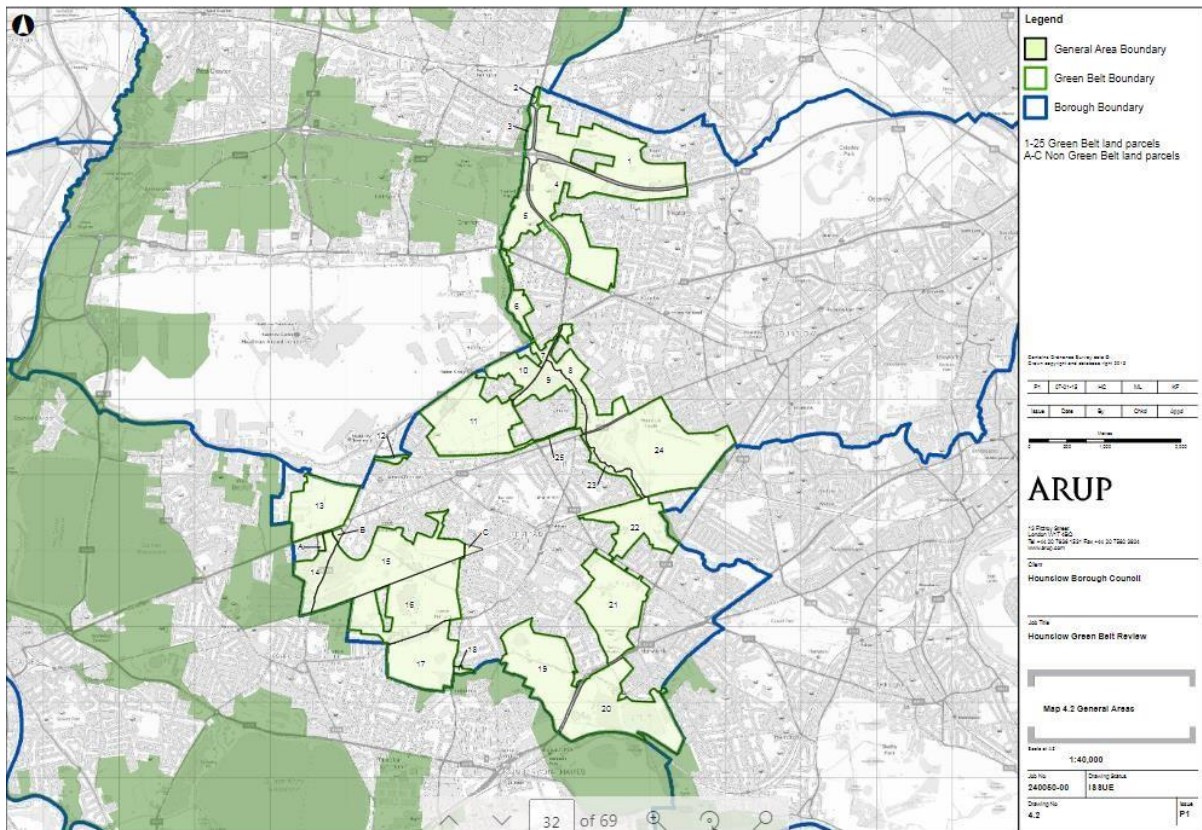


Figure 4: General Areas for assessment



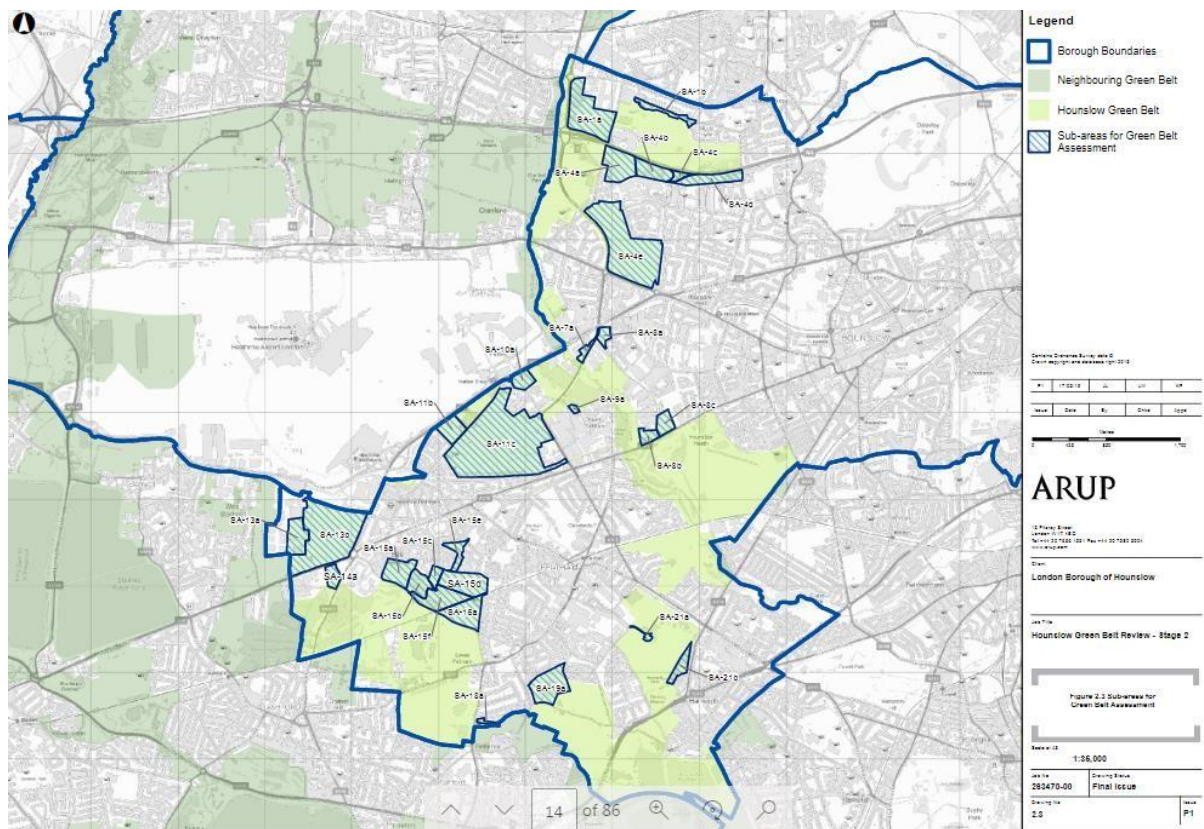
- 3.5 The study then used a methodology (set out in detail in Section 4 of the Stage 1 report) to assess the resulting GAs against the NPPF purposes, assessing whether and to what degree each parcel contributed towards meeting the various purposes.
- 3.6 Overall, this concluded that the Green Belt in Hounslow performs a mixed role with regard to NPPF purposes. To the north and centre of the borough, the study identified areas of Green Belt which are fragmented and isolated from the wider Green Belt, being under the influence of the urban area and playing a limited role in preventing the sprawl and merging of settlements. However, in many of these cases, the assessment found that the Green Belt served the important function of breaking up continuous built form, separating different character areas and providing valuable green space.
- 3.7 To the south and west of the borough, the study identified areas of more substantial Green Belt land which are crucial to preventing the outwards sprawl of London and the merging of Greater London with settlements in neighbouring Surrey and retain a particular 'countryside' character.
- 3.8 The study also carried out landscape appraisals of Green Belt land in the borough. Overall, this found that the character of the Green Belt in terms of 'countryside' has become diluted due to inter-war and post-war urban sprawl, development of Heathrow Airport and the particular character of areas in Outer London. The Green Belt predominantly consists of woodland, open common and arable farmland, it stated, though many General Areas have more of an urban than countryside feeling.

- 3.9 The Crane Valley Corridor is a significant portion of continuous landscape that runs through the Green Belt, the study found. This area is characterised by a number of recurring countryside landscape elements – mature woodland, glades, water bodies, river and accessible recreational footpaths. These provide the functions of supporting informal recreation and the movement of ecology and biodiversity in and through the borough, the study found.
- 3.10 The appraisal resulted in more detailed recommendations for future Green Belt boundary amendments, and in particular, that a number of General Areas were identified as particularly valuable open spaces, serving as valued local gaps in the borough’s built form. Notably, this encompasses Hanworth Park, Hounslow Heath and the Crane Corridor – those areas which were performing important strategic functions as valuable green spaces. The report recommended that these should be offered particular attention during the Stage 2 assessment.
- 3.11 As well as assessing whether GAs should be retained in the Green Belt or subject to further consideration, the study also identified GAs where boundary features offered scope for sub-division, with the resulting sub-areas having the potential for further consideration at the later Stage 2 assessment.
- 3.12 The specific recommendations of the final study were that:
- 5 GAs should be retained fully within the Green Belt;
 - 6 GAs should be partially retained within the Green Belt, with the remaining sub-areas taken forward to a more detailed Stage 2 assessment;
 - 14 GAs should be fully taken forward to the more detailed stage 2 assessment;
 - 1 non-Green Belt area should not be considered further for inclusion in the Green Belt;
 - 2 non-Green Belt areas should be considered further for inclusion in the Green Belt.

The Stage 2 Green Belt Assessment

- 3.13 Following a draft study which Hounslow Council undertook to review the Stage 1 findings in more detail (the draft Stage 2 study), the Council commissioned Arup to carry out a full Stage 2 assessment to verify the analysis and conclusions of the draft Stage 2 study, in particular to further assess a range of sub-areas including those which had been identified for further analysis in the Stage 1 study, as well as to undertake a partial review of the Stage 1 study to check its compliance with the revised NPPF published in 2018.
- 3.14 In undertaking the study, Arup were commissioned to assess:
- The six GAs identified for potential sub-division in the Stage 1 assessment, and
 - Sites within the Green Belt emerging from the Council’s capacity work in the West of Borough area.

Figure 5: Sub-areas for assessment at Stage 2



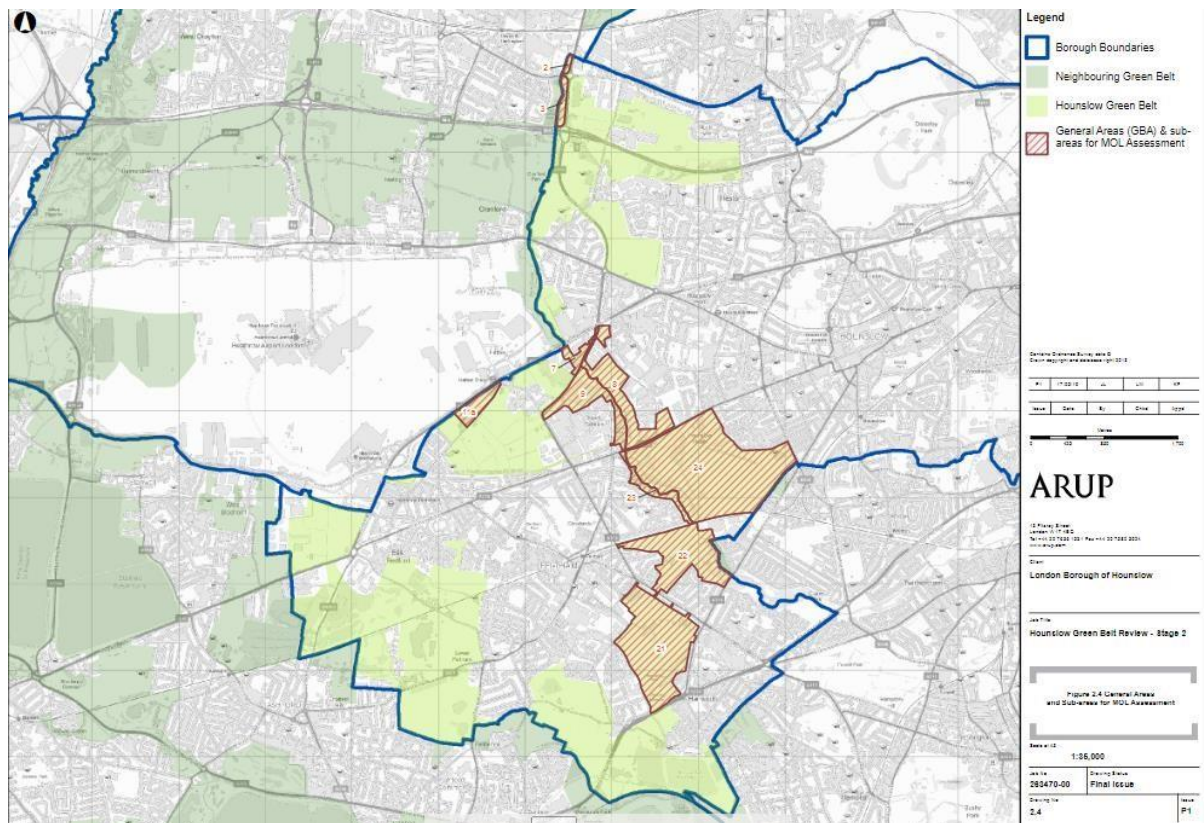
3.15 The methodology for the Stage 2 study comprised an assessment of the areas against Green Belt purposes, an assessment of impacts on the wider Green Belt, and a consideration of boundaries including assessing the strength of and potential revision to Green Belt boundaries.

3.16 At the culmination of the sub-area assessments, Arup provided recommendations according to whether the parcel should be considered further, either in isolation, in combination with another parcel or as a strategic cluster. It recommended that:

- 15 sub-areas should be considered further in isolation (RAs)
- 6 sub-areas should be considered in combination with others (RCs)
- 10 sub-areas should be considered as a strategic cluster (RS)

3.17 The Stage 2 assessment also further considered some of the general areas that were found at Stage 1 to be weakly performing but were also found to be serving an important role as open space and as providing valued gaps (termed as ‘areas of particular local value’ in the study) in the borough’s built form (as noted in para 3.5), or that were found to be covered by major policy constraints.

Figure 6: GAs and sub-areas for MOL assessment



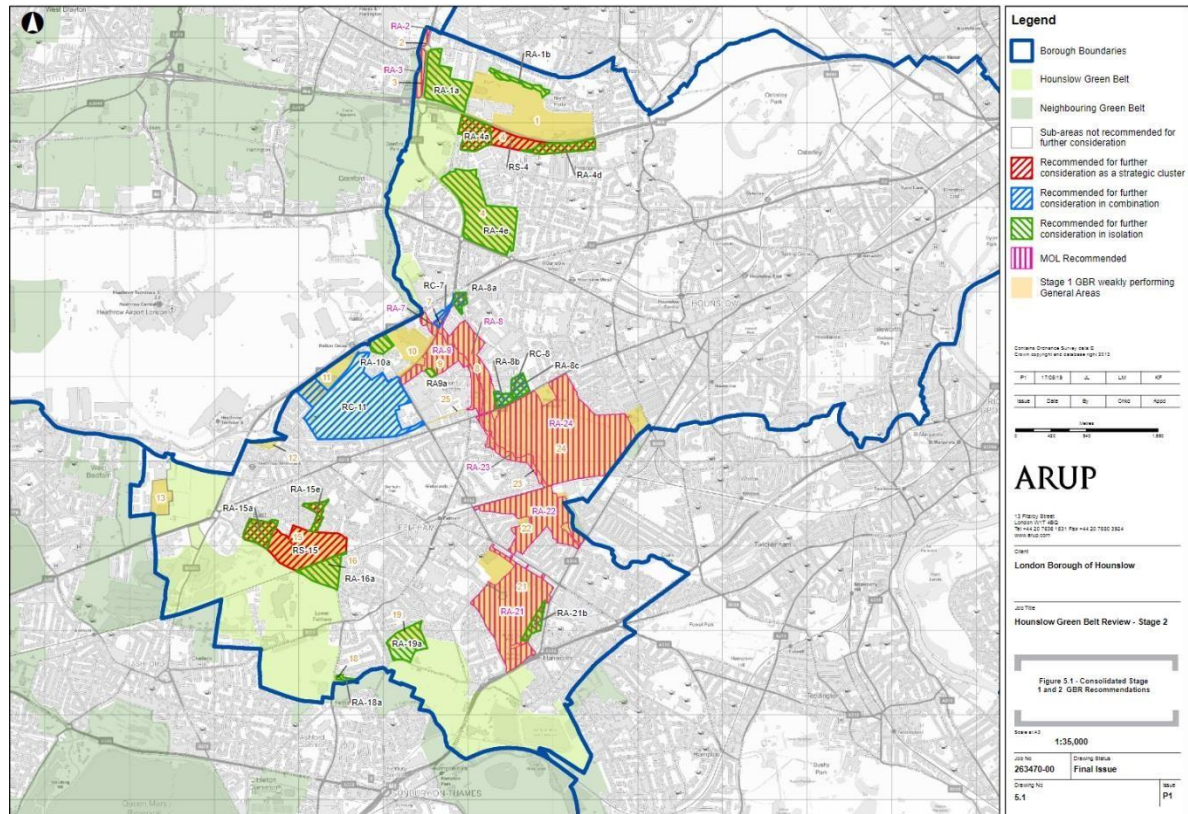
3.18 In particular, the study assessed these areas further to determine whether it would be appropriate to re-designate them as MOL, using the four specific criteria for such designations in the London Plan (see section 2). Using a five-point scale for each criterion from 1 to 5 (weak to strong) an overall score was developed for each area based on the highest scoring criteria and a narrative justification produced, together with recommendations indicating whether these areas should be re-designated as MOL or not, or whether they should be partially designated as MOL.

3.19 Where areas were recommended for re-designation, the narrative from the assessment was also used as the basis for recommending a strategy in relation to either conserving, enhancing or restoring parcels of land and elements within, in line with MOL objectives. Section 2.2.2 of the Arup Stage 2 report provides further detail on the methodology for this assessment.

3.20 The overall result of the MOL assessments were that:

- Three areas were recommended for further consideration as MOL
- Six areas are partially recommended for further consideration as MOL; and
- One area is not recommended for MOL.

Figure 7: Green Belt Assessment Stage 2 recommendations



- 3.21 The Stage 2 report at paragraph 1.2 notes that the review is not a policy or decision-making document that proposes any release of Green Belt land, but that it is an important part of the evidence base informing the Hounslow local plan. It notes that it is not within the remit of the Stage 2 report to consider exceptional circumstances arguments, which the NPPF requires as necessary to justify the release of land from the Green Belt.
- 3.22 The report says it will fall to Hounslow Council to further assess the sustainability and deliverability of areas of land assessed through the Stage 2 report, as appropriate, as part of the wider plan-making process.

Exceptional Circumstances Methodology

- 3.23 The Council has taken a systematic approach to assessing whether exceptional circumstances exist justifying a Green Belt alteration. The methodology it has adopted for this process has been generated from national policy in the NPPF 2023, the recommendations provided by Arup, a review of case law, national policy and case studies from local plan examinations elsewhere.
- 3.24 The fundamental approach in the process is to present two strands of exceptional circumstances – firstly a strand at **strategic level**, which outlines the wider context of the plan objectives and the limitations of its ability to achieve these objectives without releases of Green Belt land. In particular, this assesses whether there are forms of development type for which (a) there is unmet need and (b) that

this need cannot be delivered via any other means than the release of Green Belt sites.

- 3.25 The methodology also assesses whether exceptional circumstances have been demonstrated at **site level**.
- 3.26 In this process, each area or sub-area being assessed is subject to an assessment of its developability. Where sites have found to be not meeting Green Belt purposes or only meeting them weakly, but they are also found to be **not developable**, then it is not generally considered that there are exceptional circumstances for Green Belt release.
- 3.27 Where sites which are weakly performing in Green Belt terms are found to be **developable**, an overall judgement is made of whether **exceptional circumstances** exist for release on a site-by-site basis, including a consideration of the site's sustainability and the level of benefits provided by each site (such as how far each site contributes to delivering or alleviating unmet development requirements and the degree of harm to the Green Belt that would be caused by its release).

4. Assessment of Exceptional Circumstances – strategic level

Housing

- 4.1 When the inspector's report into the 2015 Hounslow local plan was published, it recommended that, in order to meet the full extent of the need for housing, the council would have to prepare partial local plan reviews in two areas of the borough which designated as Opportunity Areas in the London Plan – the Great West Corridor and the West of the Borough. The report stated that the partial review for the West of the Borough would need to include a review of the Green Belt boundary and would determine the quantum and location of development in the area. The report found that the plan's housing trajectory indicated housing completions would be expected to meet the existing London Plan annual target in the early and middle years of the plan but below it in later years – so the plan review would need to make additional allocations to boost supply in the later period.
- 4.2 The Green Belt Assessment was commissioned in this context. Subsequently, the London Plan which was published in 2021 established new ten-year housing targets for boroughs, and set out an approach to setting targets beyond the ten-year period.
- 4.3 Reflecting this, the emerging borough-wide Hounslow Local Plan 2020-2041 seeks to maximise the supply of housing to meet need in a manner that is consistent with sustainable development principles. To deliver the homes needed in the borough, the Council applies the borough's London Plan derived target of 1,782 homes per annum from 2020 to 2029, which is 16,038 homes.
- 4.4 The approach set out in paragraph 4.1.11 of the 2021 London Plan is followed to determine the plan housing target for the post 2029 period of the plan. This is a capacity-led approach which is largely informed by the Council's local evidence of

identified capacity in the Site Allocations and Capacity Assessment (2024) as well as having regard to the other requirements set out in paragraph 4.1.11 of the London Plan. This results in an annual target of 1,000 homes per year from 2029/30 to 2040/41 which combined is equal to 12,000 homes over the 12-year period.

- 4.5 The overall housing target for the plan is therefore 28,040 homes. The local plan provides for this target, and makes provision to augment this growth where new infrastructure investment creates opportunities for levels of growth previously found to be unsustainable. The spatial focus of new development will shift throughout the phase of the local plan, reflective of the availability of land, but the key focus for new development will be the borough's opportunity areas and town centres.
- 4.6 The total housing supply identified in the plan is 28,840 homes which includes 15,600 homes on site allocations and these are all within existing urban areas. Therefore, the Council is able to meet its housing targets without needing to release any Green Belt land, and there are not considered to be any other grounds for releasing Green Belt land for housing. The Council therefore considers that there are no exceptional circumstances to justify any release of land for housing.

Traveller sites

- 4.7 The Hounslow local plan has been informed by a west London-wide Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA), which was published in 2019. The study sets out identified pitch and plot needs for gypsies, travellers and travelling showpeople (GTTS). Given the existing location of GTTS sites in the borough, all of the need arising is located within the western part of the borough. Specifically, the travelling showpeople need occurs in Feltham town centre and the gypsy and traveller need from the Hartlands site in Cranford.
- 4.8 The extent of the need has been identified as 33 traveller pitches and 26 travelling showpeople plots during the period 2020-41. The figure for travelling showpeople includes 11 existing plots at the Baber Bridge Yard in Feltham that will be protected as a travelling showpeople site, which therefore reduces the travelling showpeople need to 15 plots across the borough.
- 4.9 Owing to the limited availability of previously developed land in the borough, and coverage of Green Belt and other restrictive designations, it is considered that windfall sites would be unlikely to come forward on land that is not designated Green Belt or MOL. The PPTS makes clear that traveller sites are inappropriate development, which should not be approved except in very special circumstances. The Council will therefore seek to meet the needs for GTTS sites through the plan-making process.
- 4.10 The Council carried out work to identify sites to meet the full GTTS needs over the plan period through the site allocations and capacity assessment (SACA) addendum 2024. Sites were assessed in accordance with a methodology which complies with that set out in planning practice guidance. Overall the process identified two deliverable and developable sites to meet the identified GTTS needs.
- 4.11 Having carried out an extensive assessment of potential sites for meeting this need, the Council considers that the most appropriate sites are at the following two sites:
- Land north of Church Road, Cranford (20 new G&T pitches)

- Land south of Bedfont Road, Feltham (12 new TS plots)

- 4.12 The location of these identified sites is in the western part of the borough., and they are located within the Green Belt. Due to the pressing need to find sites to meet GTTS needs, and extremely limited availability of previously developed land in the borough, the Council considers that exceptional circumstances exist for the removal of these sites as an exceptional, limited alteration to meet a specific, identified need for a Gypsy, traveller or Travelling showpeople site, in accordance with the PPTS 2024. It is not considered that the proposed site insets would cause wider harm the Green Belt, and the Council considers that their removal is justified by the lack of alternative site options for meeting the need for traveller sites.
- 4.13 A further 24 sites were assessed in the assessment which were found not to meet one or more of the suitability, availability and achievability tests. The sites selected are optimally located either adjacent to or in proximity of the borough’s existing GTTS sites, preventing the existing communities from being displaced.
- 4.14 Given this was a bespoke site search and assessment exercise for traveller sites in the west of the borough, and given the lack of any available land not within the Green Belt, as well as the very limited nature of the resulting releases, this exercise was undertaken separately to the wider Green Belt Assessment exercise which was a more strategic analysis of land parcels in the Green Belt.

Employment

- 4.15 The Council’s latest Employment Land Review (ELR) was published in July 2024. This was carried out by consultants Rapleys, and is the latest picture of the employment market and the projected need for employment land during the plan period, following on from previous studies carried out in 2016 (by Peter Brett Associates) and 2020 (by Stantec).
- 4.16 The latest projections continue to show a very significant requirement for additional employment land, and particularly for industrial land to cater for logistics, warehousing and other industries operating in close proximity to Heathrow. The latest projections are as follows:

Table 1: Requirement for employment floorspace (2020-41):

Area/Type	Total (sqm)
Industrial (West of the Borough)	255,598
Industrial (Great West Corridor and Rest of the Borough)	208,198
Offices (borough-wide)	204,821

Source: Rapleys (see ELR Update, Tables 4.4 and 5.5)

- 4.17 For industrial land, the requirement figure is split between the West of the Borough and the remainder of the borough. This is due to the very distinct geographical split to the nature of the demand. As stated above, the planning context in this area and particularly the presence of Heathrow and related businesses, is a major spatial factor. In particular, it has created a significant demand for employment premises in the surrounding area, and premises of a particular format, scale and type. As the ELR states, there is a strong focus locally on logistics, freight forwarding and supply chains to Heathrow airport. In the west of

the borough, the demand is focused on Heathrow-related logistics/distribution, whereas in the remainder of the borough, it is more focused on last mile and manufacturing.

Assessing land supply for employment

Offices

- 4.18 The requirement for additional office floorspace, as set out in the ELR, encompasses traditional offices and activities that are workshop/studio based, to reflect the growth of businesses and sectors which require a more flexible format of floorspace. In considering future supply, the ELR highlights that the focus for the growth of businesses that require a workshop element is in the GWC, where office activity and media industries in particular are well established.
- 4.19 Like industrial, the ELR supports and assumes retention of existing stock, and assumes brownfield intensification through the site allocations, much of which is derived through the GWC masterplan. This process results in an identified supply of around 69,000 sqm and therefore an unmet office need of 136,000 sqm. While acknowledging that this is a considerable shortfall, the ELR states that while the market is not seeking or promoting new sites at the moment, there is little rationale for planning policy to remedy this.
- 4.20 The ELR notes that there is nothing preventing redevelopment of policy-compliant stock, e.g. town centre office supply, for new formats. Within the GWC, it highlights that there is scope to reshape the development mix between uses over the very long delivery programme for this area. It recommends that the current priority should be to take a flexible approach to scheme development and that there would be scope to identify more supply within the plan period if needed.
- 4.21 Overall, the recommendation from the ELR is that existing stock should be protected for office use but that there is no need for new greenfield land for office use in the borough. Therefore, the Council considers that there are no exceptional circumstances for the release of land from the Green Belt for office floorspace.

Industrial

- 4.22 The fact that there is a very distinct market for industrial land in the west of the borough means that the requirement for this format of industrial land cannot be met in other parts of the borough. While the plan is encouraging industrial intensification and making allocations to deliver new industrial capacity elsewhere, particularly in the GWC, this will not deliver the format, type and scale of development that will meet the demand from the Heathrow-related market in the west of the borough. That is a demand that can only be met in the west of the borough, close to the airport. As the ELR Update states: "The format of space that we may see developed alongside housing in the GWC is not the format of space needed at Heathrow" (para 6.10).
- 4.23 With the requirement figures in the ELR showing a very substantial requirement for additional land for employment floorspace, the study recommends that more land is needed for new and expanded premises, to help avoid further loss of businesses from the borough (para 3.86).

- 4.24 As a result, site search exercises for delivering land to meet the need for industrial land in the West of the Borough are focused on those areas close to the airport where there are existing clusters of industrial land. These are described in the ELR Update as Bedfont Lakes, Feltham, North Feltham and M4 junction 3.
- 4.25 In order to identify a sufficient supply of industrial land, the ELR recommends firstly that the Council retain all existing employment designations and creates a new group of LSIS designations, most of which are being taken forward in the plan. It also encourages the Council to protect existing supply via the current policy framework which requires applicants to produce marketing evidence to justify any loss of floorspace.
- 4.26 In terms of looking at the supply of new potential employment land, the ELR incorporates an allowance for permissions/completions, and sites being allocated through the plan. This latter category has been identified through the SACA process, which incorporated a call for sites and an assessment of the optimal density of sites. This process scrutinised the potential for sites across the borough, focusing on urban areas, existing sites (including potential for intensification) and land outside major constraints, in line with advice for such studies in planning practice guidance (PPG). Many of the key allocations in the Great West Corridor have also been developed through the GWC Masterplan.
- 4.27 Having assessed potential sources of supply across the borough through these means, including in the west of the borough area, all of the sites suitable and available for redevelopment have been taken forward as allocations and, in the west of the borough area, these form a limited source of supply. For the other sites assessed in the SACA, the overall conclusion was that there is very little scope for industrial intensification at these sites.
- 4.28 The ELR does make an allowance for sites which in theory could be redeveloped and intensified, among the existing stock in the west of the borough. It assumes that around 95,000 sqm of further intensified space could come forward in this area. This is based on the consultants' assessment of underused land. These sites have not been promoted for development by their landowners and when assessed many were observed to be intensively developed already, so if developed would struggle to deliver meaningful net increases. But the study finds that some sites may be able to come forward for redevelopment to higher plot densities than existing, and that it is not unreasonable to assume potential theoretical capacity of around 95,000sqm net additional industrial floorspace from underutilised sites.
- 4.29 The council acknowledges this approach and is taking forward policies and allocations to encourage the provision of intensified/additional floorspace on existing sites. However, it also notes that this stock of industrial land in the west of the borough is already reasonably modern, and the growth of the airport in recent years has already led to market-led regeneration of the estates. As the report also points out, this type of intensification does not generally yield significant gains in floorspace, because, to use space more efficiently, developers and owners tend to prefer higher property which includes provision for higher racking and/or mezzanine floors. Regeneration may therefore result in a poorer plot ratio, because more yardage is needed to service the property.

- 4.30 So while the Council recognises that there could be a potential source of additional floorspace from the under-utilised existing sites, with none of these sites having been promoted to the Council or found to be available for development, it considers that this is not a source which can be relied upon.
- 4.31 The tables below summarise the various sources of supply assessed by the ELR and which the Council considers it appropriate to rely on, together with how far these meet the requirement for additional floorspace identified in the study. See Table 6.2 of the ELR for a detailed outline of the sources of supply and the phasing of each element of demand and supply.

Table 2: Summary of industrial need/supply (Great West Corridor & Rest of the borough): 2020-41

Demand/supply element	Floorspace sqm
Industrial demand: GWC/Rest of the Borough	208,198
Supply	
Net change in completions 2020-21-21-22	-
Planning permissions	13,815
Brownfield intensification	86,396
Total supply	100,211
TOTAL REMAINING INDUSTRIAL NEED (GWC/ROB) 2020-41	107,987

Source: ELR 2024

Table 3: Summary of industrial need/supply (West of the Borough): 2020-41

Demand/supply element	Floorspace sqm
Industrial demand: West of the Borough	255,598
Supply	
Net change in completions 2020-21-21-22	(7,354)
Planning permissions	7,660
Brownfield intensification	7,794
Total supply	8,100
TOTAL REMAINING INDUSTRIAL NEED (WoB) 2020-41	247,498

Source: ELR 2024

- 4.32 Table 2 above shows that almost half of the need for industrial land identified in the GWC and the Rest of the Borough can be delivered through brownfield intensification, including through the site allocations in the local plan. This reflects the significant opportunity for industrial intensification and, in some cases, co-location, which have been identified in these areas, including through the GWC Masterplan.
- 4.33 Regarding the remaining requirement for industrial floorspace in these areas, the Council considers that the need is of a typology that can be delivered through the

market on policy-compliant sites where required, in a similar manner to the outstanding office need. It is also noted that the floorspace delivered is almost the full extent of floorspace needed in the first phase of the plan, according to the projection in the ELR (Table 6.2). The next plan review would have the opportunity to assess the delivery of floorspace and to make plans and allocations to further meet the need for the outstanding requirement for floorspace. In any case, the remaining need would be likely to be needed within the GWC and rest of the borough, and so it would not necessarily be appropriate or effective to search for land in the Green Belt to meet this unmet need.

4.34 By contrast, Table 3 shows that brownfield intensification is able to meet very little of the outstanding need identified for industrial land in the West of the Borough. The need for industrial floorspace here is a very substantial amount, at 255,000 sqm, and the plan is only able to identify scope for previously-developed sites to supply around 8,000 sqm of floorspace, reflecting the much more limited scope for industrial intensification in these areas, leaving a very significant shortfall. Further, the need is immediate: table 5.5 of the ELR (see below) shows that 145,285sqm of the need for industrial land in the West of the Borough is required in the first phase of the plan – a figure which indicates the issues with the existing shortfall of land to meet this very significant requirement, and which also indicates the urgency of finding a solution to this shortfall of land.

4.35 As the ELR states (para 6.24), there is no short-term pipeline of space and there is a backlog of demand. Relying on intensification as a solution, it says, would mean there would not be a robust short-term deliverable supply of land.

Figure 8: Excerpt from ELR: Table showing industrial demand by area and period
Table 5.5 LB Hounslow - industrial demand by area and period – 2020-41

Period	2020-25	2025-30	2030-35	2035-41	TOTAL 2020-41
WEST OF THE BOROUGH	sq m	sq m	sq m	sq m	sq m
DEMAND					
Economic forecast	(14,168)	80,035	43,941	73,938	183,746
Existing stock vacancy adjustment		58,980			58,980
Replace losses (completions 2020/21-21/22)	6,602				6,602
Replace losses (pipeline permissions)		6,270			6,270
Total Need	(7,566)	145,285	43,941	73,938	255,598
GREAT WEST CORRIDOR and REST Of The BOROUGH	sq m	sq m	sq m	sq m	sq m
DEMAND					
Economic forecast	(9,445)	53,357	29,294	49,292	122,497
Existing stock vacancy adjustment		39,320			39,320
Replace losses (completions 2020/21-21/22)	36,999				36,999
Replace losses (pipeline permissions)		9,382			9,382
Total Need	27,554	102,059	29,294	49,292	208,198
Borough-wide total demand	19,988	247,343	73,235	123,230	463,796

Source: Experian forecast, plus Stantec analysis

- 4.36 As stated above, the Council considers it would not be appropriate to rely on potential intensification of under-utilised land to alleviate this shortfall. It therefore considers that other options to help deliver supply should be considered. The first of these is exporting need through the Duty to Co-operate, and the second is considering the release of Green Belt land to help deliver further supply.
- 4.37 As part of the Duty to Cooperate process, the Council has held discussions on strategic planning issues with neighbouring authorities, authorities within the sub-regional partnership group the West London Alliance (WLA) and authorities within the Heathrow Strategic Planning Group (HSPG), a collaborative working group focusing on strategic planning issues arising from the potential expansion of Heathrow Airport. These discussions have included the following authorities:
- Neighbouring authorities – London Boroughs of Ealing, Hammersmith & Fulham, Hillingdon and Richmond upon Thames, and Spelthorne Borough Council (Surrey);
 - West London Alliance members – London boroughs of Hillingdon, Harrow, Brent, Barnet, Ealing, Hammersmith and Fulham;
 - Heathrow Strategic Planning Group members – LB Ealing, Spelthorne Borough Council, Slough Borough Council, Royal Borough of Windsor & Maidenhead, Elmbridge Borough Council, Runnymede Borough Council.
- 4.38 These discussions have included exploration of each authorities' ability to accommodate its development requirements and whether any authorities have spare capacity to accommodate any unmet needs arising elsewhere.

- 4.39 Neighbouring authorities have confirmed they have no spare capacity and this is detailed in the statements of common ground being pursued with these authorities. Regular discussions as part of the WLA and HSPG meetings have also suggested that no spare capacity exists within the areas covered by these groups.
- 4.40 Having tested these options, therefore, the Council considers that, given the very substantial scale of the requirement, together with the limited capacity for meeting this need on existing sites, there is a need to search beyond these sources for a supply of land for industrial floorspace to serve this area. Given that the particular requirement which is identified as having a current shortfall can only be met in the area of the borough close to Heathrow, the Council considers that the only additional option available in order to help meet this requirement is therefore the use of land released from the Green Belt. As the ELR states (para 6.25), through the use of sites released from the Green Belt, the Council would have the ability to manage short-term risks and provide some much-needed short term supply.
- 4.41 **Overall, it is therefore clear that with no release of Green Belt land, there would be a substantial shortfall in employment floorspace requirements in the WoB of the type required. The spatial nature of this requirement – the need for it to be located in close proximity to Heathrow Airport – means that this floorspace would not be able to be met elsewhere in the borough. Given the importance of the logistics and aviation-related business sectors to the Hounslow economy, particularly in this unique location in the vicinity of Heathrow, the Council considers that not meeting these development requirements would not be a sustainable strategy, as it would have a harmful impact on economic and social indicators.**
- 4.42 The Green Belt Assessment has therefore been carried out to assess the performance of land in the Green Belt against the purposes set out in the NPPF. Where areas or sub-areas have been recommended for further consideration, these have then been assessed for their potential for providing additional employment land and whether this constitutes exceptional circumstances to justify release. These have then been re-tested in the SACA. In parallel with this, the Sustainability Appraisal, which is embedded into the Integrated Impact Assessments (IIAs) for the plan reviews, has appraised the sustainability of the overall approach as well as noting the various sustainability metrics on each site.

Options for Green Belt releases

- 4.43 The Green Belt Assessment has recommended a series of sub-areas for further consideration, which could be capable of delivering additional land for employment development. These are:
- RA1A: Land at and south of Western International Market, Cranford
 - RC8: Land at Central Park Trading Estate/Ron Smith Recycling
 - RA10A: Land east of Dick Turpin Way
 - RC11/SA11A: Land at Hatton Fields

These are all areas or sub-areas which the assessment has judged meet Green Belt purposes weakly or moderately, and which could be considered further.

The largest area proposed for release is RC11/SA11A (Land at Hatton Fields). The ELR has also tested the suitability of this land for employment development, and found that it would be a highly suitable and attractive site for the market.

- 4.44 In addition to land at Hatton Fields, the ELR Update and other studies have also tested the suitability of a number of other sites for industrial development, with four other sub-areas assessed as being capable of providing land for industrial floorspace.
- 4.45 The ELR has tested the suitability of these areas for employment development and finds that they would be highly suitable sites and attractive for the market operating close to Heathrow.
- 4.46 Taken together, these various sites would provide land which would help reduce the shortfall in the industrial land requirement. They would also provide the *type* of land required in the vicinity of Heathrow to provide suitable premises for the logistics and distribution services, many of which are associated with activities at the airport.
- 4.47 Were the land recommended for possible release for employment land to be removed from the Green Belt, it could therefore help close the gap between demand and supply of industrial land, both in quantitative and qualitative terms.
- 4.48 The table below sets out further detail on these parcels of land and Appendix A provides a parcel appraisal of each one, alongside an assessment of exceptional circumstances.

Table 4: List of proposed areas to be released from the Green Belt for employment or mixed-use development, or employment and local open space

Site	Potential floorspace capacity (sqm)	Comments/evidence base
Land at Hatton Fields, Hatton (also incorporating Site at Faggs Road, partly within the Green Belt)	69,400	SACA review found constraints can be overcome if site is released from the Green Belt (in the northern portion of the site). ELR Update says this site could deliver short-term supply.
Land south of Western International Market, Cranford	34,760	SACA review found constraints can be overcome if site is released from the Green Belt. The site is within the Heathrow market area, and is a large, highly accessible site, free of constraints from nearby residential uses, and will be attractive to airport-related demand. Benefits of the site include its proximity to the airport and existing industrial estates, and its ease of access to the strategic road network.

Green space and car park at Central Park Trading Estate, Feltham	6,000	SACA review found constraints can be overcome if site is released from the Green Belt. Extension of existing trading estate on to land which the Green Belt Assessment has recommended for further consideration for release. The site is likely to be attractive to the market and readily taken up.
Vacant land at Dick Turpin Way	12,000	SACA review found constraints can be overcome if site is released from the Green Belt. The site is well located and commercially attractive for industrial use. Benefits of the site include its proximity to the airport and existing industrial estates, and its ease of access to the strategic road network.
Ron Smith Recycling (south of North Feltham Trading Estate)	8,420	Existing recycling area, adjacent to the North Feltham Trading Estate. 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. The site is listed as an existing waste site in the adopted West London Waste Plan (listed as St Albans Farm Recycling Facility). Policy WLWP2 of the waste plan says 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. Any proposed redevelopment would therefore need to comply with this policy.

4.49 Therefore with these potential sites offering additional floorspace, the ELR states that the sites in the Green Belt would have the potential to provide a further 130,480sqm of floorspace. Overall, it says, the Green Belt sites halve the borough's unmet need to a shortfall of 130,000sqm over the plan period

4.50 The Council considers that there are exceptional circumstances for the sites listed in the table above to be released from the Green Belt to help reduce the very substantial shortfall in the requirement for industrial land. Unlike the shortfall for office development, where developers can come forward on policy-compliant sites to deliver additional capacity if required, there are very limited options to alleviate

the shortfall of land for industrial floorspace through means other than the release of Green Belt sites.

MOL assessment parcels

- 4.51 In the Green Belt Assessment carried out by Arup, the consultants found in Stage 1 that some of the parcels were weakly performing in Green Belt terms but were what they termed ‘areas of particular local value’ (see Map 6.4 of the Stage 1 Arup Study). This meant that they continued to perform a critical open space function and had key landscape characteristics which meant they should continue to be afforded robust protection from development. The Council therefore commissioned an assessment at Stage 2 as to whether it would be appropriate to redesignate these parcels as MOL. This involved an assessment of whether the parcels met any of the four tests for MOL as set out in the London Plan (i.e. if they met the tests referred to in para 2.19).
- 4.52 The study concluded that, in the case of most of these parcels, it would be appropriate to re-designate them as MOL. However, the inspectors conducting the stage 1 examination into the West of Borough local plan review, recommended that, due to policy changes to the London Plan policy on Green Belt, that there were no exceptional circumstances for making this change.
- 4.53 The Council therefore does not propose to redesignate these areas of land as MOL. However, it should be emphasised that a key factor for these parcels of land is that they not developable and have been found to have an important open space function and that, in the majority of cases, they were found to be worthy of designation as MOL. Therefore, in the context of the new grey belt policy introduced in the NPPF 2024, it is clear that these areas have a particular function as open space. The Council considers that **if these parcels are not being redesignated as MOL, they are not appropriate for release from the Green Belt – and above all, these parcels of land are not suitable for development.**

5. Assessment of Exceptional Circumstances - site level

- 5.1 As discussed earlier, as part of the Green Belt Review, the Stages 1 and 2 assessments, conducted by Arup, have appraised parcels of land for how far they meet Green Belt purposes. Where general areas or sub-areas are recommended for further consideration following Stages 1 and 2, the Council has adopted a methodology whereby these sites are then assessed for their developability.
- 5.2 This developability assessment tests whether the site is suitable for development as well as appraising its availability and whether it could be viably developed at the point envisaged, in accordance with the approach in the National Planning Policy Framework. The assessment of suitability includes an assessment of specific site characteristics, including:
- Topography and landscape considerations (informed by the Green Belt Assessment, including the overall findings detailed in section 6.2 of the Stage 1 report);
 - heritage and archaeological features;

- areas of importance for biodiversity;
- Public transport accessibility;
- flooding constraints;
- transport and highways considerations.

5.3 A particular constraint in the context of Hounslow is the public safety zone on the flight path for arrivals to and departures from Heathrow Airport, so the study assesses whether any part of the site or parcel falls within this zone.

5.4 The methodology assesses whether any such constraints present would prejudice the suitability of the site for development, or whether it would be capable of being overcome by mitigation or site design. In carrying out this process, regard is had to any guidance or policy – whether at international, national or regional level - on such constraints and how they should be considered for suitability for development.

5.5 Where these areas or sub-areas are **not developable**, it is not considered that exceptional circumstances exist for Green Belt release.

5.6 All the sites proposed for release have also been subject to sustainability appraisal within the IIA. This has noted the results against various sustainability indicators within the individual site appraisals, in the technical annex of the report.

5.7 At the end of each assessment, a concluding section draws all these considerations together, and makes a judgement over whether exceptional circumstances have been demonstrated for a Green Belt boundary alteration for each individual site/parcel.

5.8 Following the completion of the Stage 2 Green Belt Assessment, the overall assessment of the various areas and sub-areas is provided in the Site Assessments Annex to this report, which states for each area or sub-area whether exceptional circumstances have been demonstrated for Green Belt release.

5.9 In summary, the table below lists the areas proposed to be released for the Green Belt.

Table 5: Summary of Green Belt areas/sub-areas proposed to be released

Sub-area	Name	Area (ha)	Future designation/use
Areas/sub-areas proposed to be released or safeguarded for development			
RA1A	Land south of Western International Market, Cranford	12.25	Employment
RC11/SA11A	Land at Hatton Fields	18.9	Employment
RA10A	Land east of Dick Turpin Way	4.35	Employment
RC8	Land at Central Park Trading Estate/Ron Smith Recycling	6.6	Employment (including existing)
Site inset (from GA4)	Land north of Church Road, Cranford	1.25	Gypsy and traveller pitches
Site inset (from GA15)	Land south of Bedfont Road, Feltham	0.8	Travelling Showpeople plots

6. Integrated Impact Assessment (IIA) findings

- 6.1 The various alternative approaches for the plan have been tested through the Sustainability Appraisal process within the Integrated Impact Assessment (IIA). The IIA report noted that options (H1 and H2 as described in the report), which deliver higher housing numbers - would need to extend housing development into the Green Belt. This would have implications for various IIA themes including biodiversity and green infrastructure, climate change, community wellbeing and cultural heritage and landscape. These implications, it says, suggest that these options rank less favourably against these themes.
- 6.2 For housing, option H3 (under which the London Plan ten-year housing targets are met followed by a capacity-led approach in the remainder of the plan period) focuses primarily on urban intensification and densification and utilises a capacity-led approach to determine the overall level of growth. The focus on brownfield development frequently leads to more favourable rankings for these options. By allowing limited employment growth on Green Belt sites within the Heathrow Opportunity means that option H3 has better potential to deliver against the full range of employment land needs, it says.
- 6.3 Similarly for the employment options, the Council considers Option E3 (under which the plan optimises new employment land to deliver around 556,000 sqm of floorspace including through the release of Green Belt land) performs the best overall against the IIA themes, including in terms of balancing the social and economic dimensions of sustainable development.
- 6.4 The IIA has also sought to evaluate the constraints and opportunities on each site based on a set of consistent criteria developed specifically for the process, to provide an indication of the relative sustainability merits of the sites (including both constraints and opportunities), and to help identify where mitigation might be required through policy requirements. Criteria and indicators used include biodiversity, flood risk and proximity to facilities and PTAL rating.
- 6.5 Among the findings for the site-based analysis are the following:
- The IIA provides commentary on the likely impact of Green Belt site releases on the various indicators under the themes of cultural heritage and landscape. In response to this, it states that Policy GB1 sets out the expectation for compensatory improvements in terms of improving access and environmental quality of the existing Green Belt. Overall, it states that the effects are largely dependent on the design and layout of development, which it says is unknown at this stage. Due to this, it says uncertainty is noted under this topic, but it recognises that the policy framework seeks to mitigate adverse impacts.
 - It notes that three of the sites proposed to be released overlap with a priority habitat. Policy GB7, it notes, outlines that it will promote the conservation, restoration and enhancement of priority habitats and ecological networks. It states that development will only be permitted where it can be shown that significant adverse impacts on biodiversity have been avoided, mitigated or, as a last resort, compensated for. It expects development proposals to,

amongst other things, achieve at least 10% biodiversity net gain, in line with the requirements set out in the Environment Act 2021, and to incorporate biodiversity supporting green and blue infrastructure and other habitats features into scheme design.

- Under the theme of soil contamination and sustainable land use, the IIA notes that the plan will result in the loss of some greenfield land. It recognises that this is largely unavoidable to meet the identified development needs.
- The IIA notes that the plan is likely to lead to long-term significant positive effects on economy and employment indicators. This, it says, is because it delivers new employment sites, which will support new jobs and boost the local economy.

7. Compensatory improvements to the Green Belt

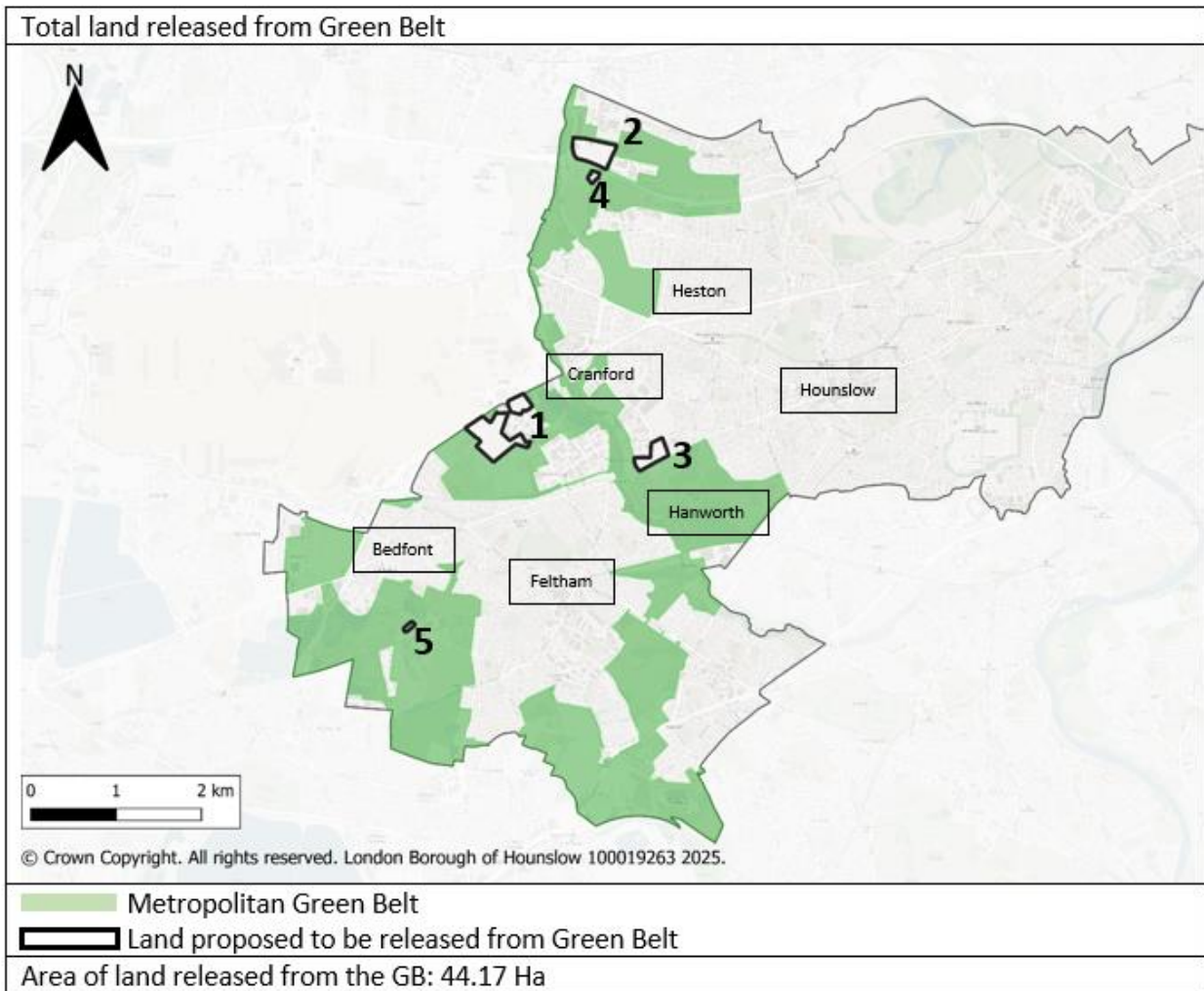
- 7.1 The NPPF (2023) states that, when conducting Green Belt reviews, local authorities should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 7.2 Previously, planning practice guidance stated that, where it has been demonstrated that it is necessary to release Green Belt land for development, policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land should be set out. It said these may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities, including those set out in local strategies. For instance, these could include new or enhanced green infrastructure; woodland planting; landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal); improvements to biodiversity, habitat connectivity and natural capital; new or enhanced walking and cycle routes; and improved access to new, enhanced or existing recreational and playing field provision.
- 7.3 Latest policy and guidance (notwithstanding that this plan is being assessed against the 2023 version of the framework) sets out that the ‘golden rules’ are an essential element of enabling major housing development on Green Belt land. These include “the provision of new, or improvements to existing, green spaces that are accessible to the public (para 156c of the 2024 NPPF).”
- 7.4 The context of Hounslow is one in which employment development is a major spatial factor and which often takes place close to residential areas. The Council therefore believes that it is essential that the releases of land from the Green Belt for employment development are accompanied by the retention of areas of open space within these parcels, and also by compensatory improvements to the areas of land remaining in the Green Belt. The delivery of compensatory improvements to the existing Green Belt when development (specifically employment development) takes place on released sites is therefore a key part of the strategy. Site requirements therefore specify that development should contribute towards such improvements.
- 7.5 There are a number of strategies and designations which will be used to guide the identification of compensatory improvements to areas of land remaining in the

Green Belt, including and the Council's Green and Blue Infrastructure Strategy (GBIS) (October 2021), the Nature Recovery Action Plan (March 2024) and the Colne and Crane Valleys Green Infrastructure Strategy (September 2019).

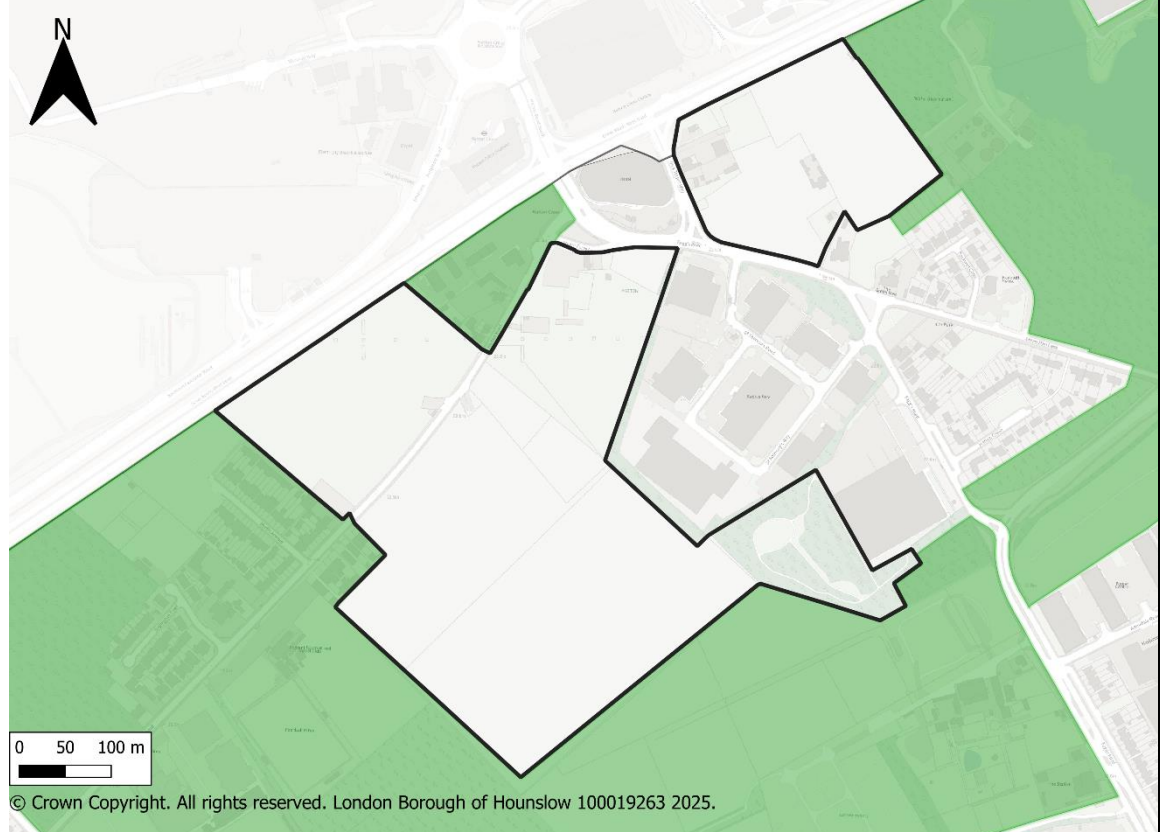
7.6 Hounslow Council will draw up further detailed mechanisms for defining, calculating and securing the contributions from development proposals, along with a strategy for delivering the improvements, and this will be set out in a future supplementary planning document.



7.7 Some of the projects above relate to land which is itself being proposed to be released from the Green Belt. In these cases, the document provides guidance for on-site development proposals, such as which elements of the land are important to be protected and which elements should be avoided or mitigated, such as biodiversity habitats. Such requirements would be in addition to the off-site contributions to compensatory improvements to the remaining Green Belt land.

APPENDIX: MAPS SHOWING CHANGES TO GREEN BELT BOUNDARIES





1 - Hatton Fields and Dick Turpin Lane Green Belt Releases



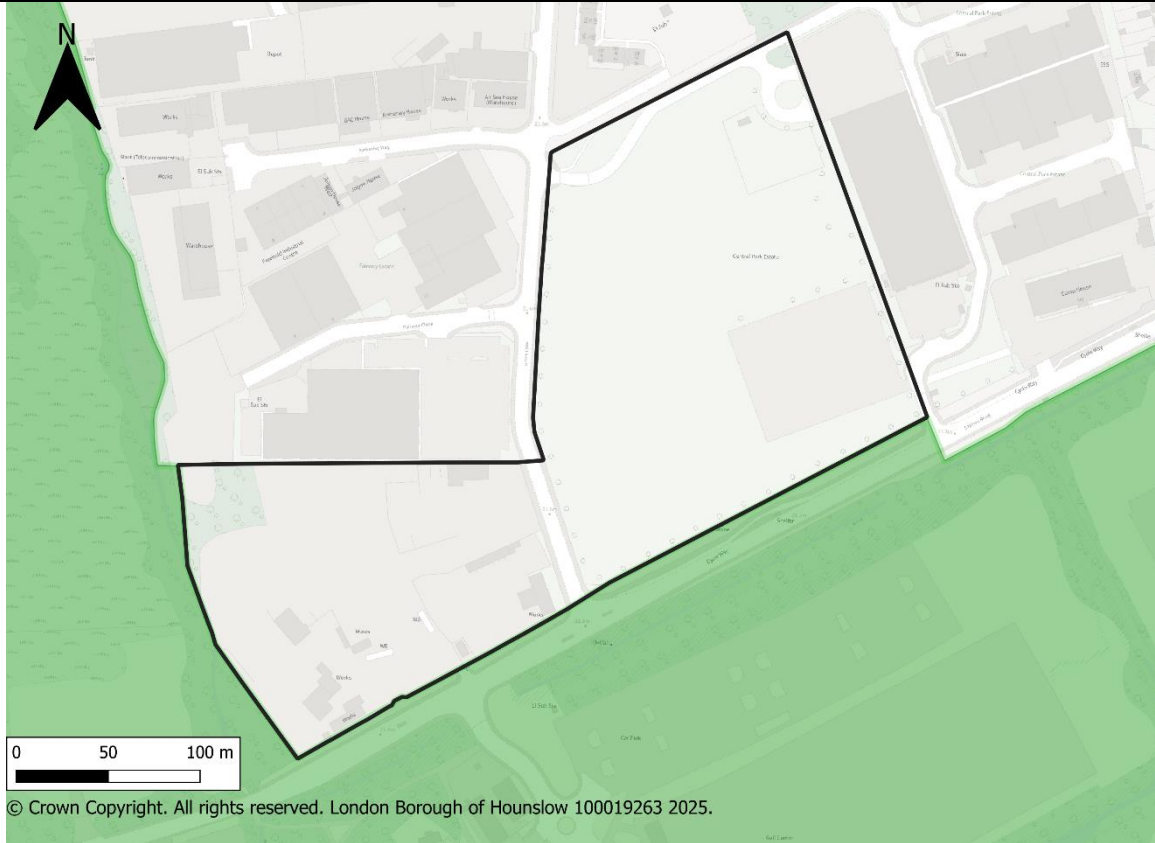
	Metropolitan Green Belt
	Land proposed to be released from Green Belt
Area of land released from the GB: 23.22 Ha	



2- Land South of Western International Market Green Belt Release



-  Metropolitan Green Belt
 -  Land proposed to be released from Green Belt
- Area of land released from the Green Belt: 12.25 Ha



3- Land at Green Lane and Ron Smith Recycling Green Belt Release



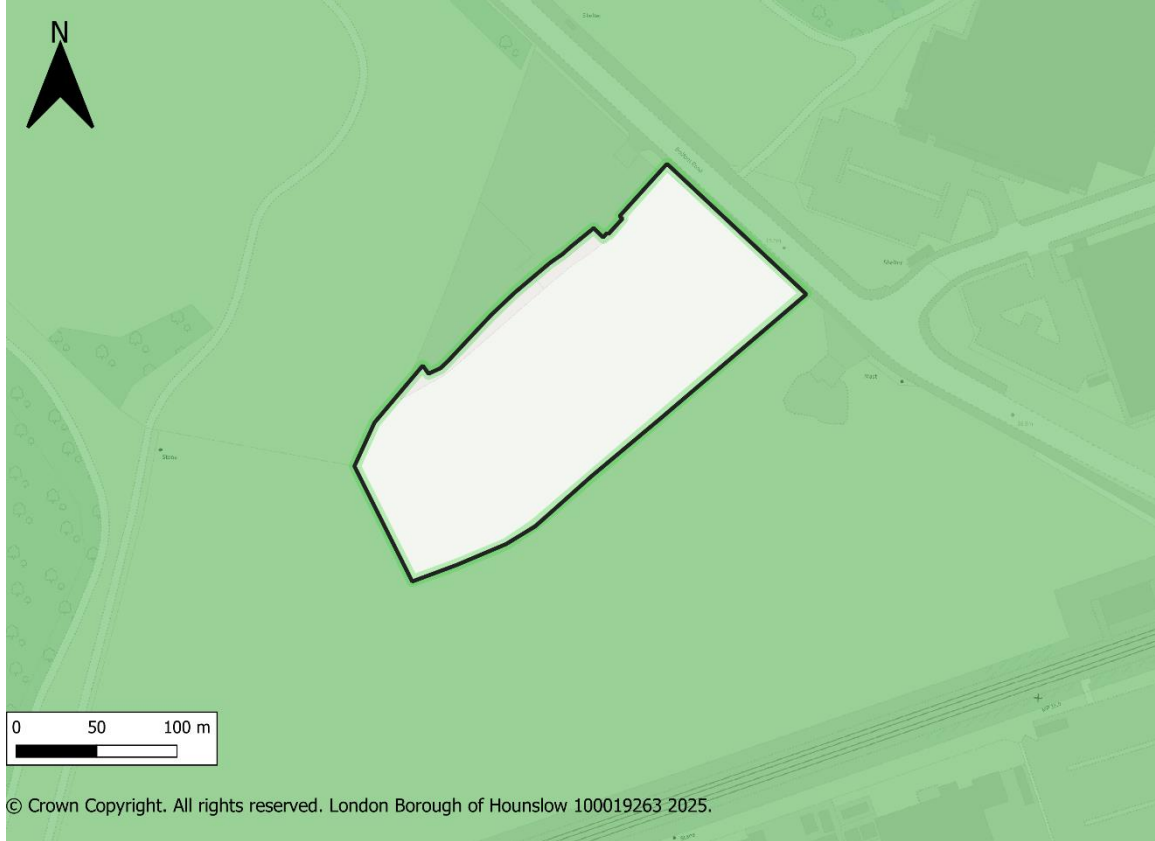
	Metropolitan Green Belt
	Land proposed to be released from Green Belt
Area of land released from the Green Belt: 6.65 Ha	

4- Land north of Church Road Green Belt Release





	Metropolitan Green Belt
	Land proposed to be released from Green Belt
Area of land released from the Green Belt: 1.25 Ha	

5 - Land south of Bedfont Road Green Belt Release



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-  Metropolitan Green Belt
 -  Land proposed to be released from Green Belt
- Area of land released from the Green Belt: 0.8 Ha