

**HOUNSLOW LOCAL PLAN EXAMINATION – RESPONSE ON BEHALF OF SEGRO
(RESPONDENT 098, 099)**

SEGRO welcome the opportunity to respond to the LB Hounslow Local Plan Matters, Issues and Questions identified by the Inspectors.

MATTER 9: SITE ALLOCATIONS

Issue: Whether the proposed allocation of sites in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

Questions:

1) Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?

2) Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery of any of the site allocations?

1. Yes, the site allocations at 48 Vacant Land at Dick Turpin Way and 57 Hatton Fields are appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts.
2. These site allocations have been subject to extensive surveys (for example, ecology surveys), assessment and technical work, including the recent landscape winter views. This survey and technical work and ongoing engagement with LB Hounslow, DfT and NATS/CAA, among others, has informed the masterplanning and capacity of the sites put forward, as explained in the Vision Document and updates to this, and now subject to draft allocations. SEGRO are not aware of any risk in terms of the infrastructure requirements, site conditions and/or constraints which might prevent or delay development or adversely affect viability and delivery of these employment sites.
3. SEGRO propose to engage in LB Hounslow's pre-application advice service.

3) Are the proposed site allocation boundaries justified and effective?

4) Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what are these based on?

5) Are the expected timescales for development in terms of lead in times and annual delivery rates for each site allocation, realistic and supported by evidence?

6) Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery?

4. Yes, in our view the site boundaries reflect the Council's Evidence Base (for example, EBGB4, 4a, 5 and 5a), including Call for Sites and the West of Borough Capacity Study (EBSC2 and EBSC2b). In context of the Hatton Fields and Vacant Land at Dick Turpin Way sites, SEGRO have carried out a significant amount of survey, assessment and technical work to inform the sites boundaries and capacity. This has not been carried out in isolation, as we have worked with LB Hounslow's Officers, TfL and NATS/CAA.
5. This work and the engagement between LB Hounslow's Officers and SEGRO to date has informed the expected timescales for the development and infrastructure requirements for the land at Hatton Fields (57) and Vacant Land at Dick Turpin Way (48) sites.
6. Policy P2(c) and the Site Allocations identifies the infrastructure requirements and the IDP should be referenced.

7) Are the proposed allocations and the associated development requirements identified in Chapter 12 of the Plan - justified, effective, consistent with national policy and in general conformity with the London Plan?

8) Are any modifications required to ensure that the individual site allocations and/or their development requirements identified in Chapter 12 of the Plan are accurate and sound?

7. There are no further modifications over and above those set out in SEGRO's Proposed Submission Version representations.

9) Policy P2(c) relates specifically to Land at Hatton Fields, without prejudice to our consideration of evidence and previous discussions that took place as part of Matter 4, are the requirements of development proposals in that policy, justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

8. We consider the requirements of the development proposals in Policy P2(c) are justified, effective, consistent with national policy. For example, contributing towards compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land at criteria G.
9. We consider the Policy is consistent with the London Plan 2021. EX5e is the SoCG between LB Hounslow and The Mayor of London (GLA) and confirms, among other things, at paragraph 1.5 that ‘The Mayor has undertaken extensive engagement with LB Hounslow’, at paragraph 2.5 that ‘the key general conformity matters include employment and Green Belt’ and at paragraph 2.7 ‘the discussion included the approach to employment, specifically appropriate employment designations, meeting industrial floorspace demand, approach to Green Belt releases for employment sites and approach to Green Belt changes’.
10. The Mayor confirms that the draft Local Plan is in general conformity with the London Plan 2021 (paragraph 4.3.2).

10) Is Policy IMP2 insofar as it seeks to support delivery of the site allocations - positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

11. Policy IMP2 looks to support the delivery of the site allocations. SEGRO consider the Policy is consistent with national policy and the London Plan 2021.