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27 April 2026

By Email Only

Dear Inspectors,

Hounslow Local Plan 2020 - 2041

Matter 9 – Site Allocations

Site Allocation 122 – Rectory Farm

CBRE Ltd is instructed on behalf of Arianda Property Holdings Ltd (hereafter 'Arianda') in respect of their land at Rectory Farm, Cranford Lane. The Site is subject to a minerals allocation (site 122), is located with the Green Belt and has been proposed by Arianda to be removed from the Green Belt to facilitate the designation of a Locally Significant Industrial Site for industrial and logistics development, following minerals extraction.

This statement solely relates to the questions under Matter 9, and should be read in conjunction with Arianda's Regulation 19 consultation response and Matter 4 written statement.

Question 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?

The draft allocation identified the delivery of the allocation between 2025 – 2035, Arianda can confirm an application for the minerals extraction will be submitted in the next few months (pre Summer 2026), with working of the minerals (extraction & restoration) expected to commence on site in 2028.

As set out in the section below and in previous representations, Arianda consider the site represents a significant opportunity to bring forward an employment led allocation with some provision for open space.

Question 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?

Document EX45 presents more up-to-date evidence on demand and supply across the borough, identifying an industrial land shortfall of approximately 36,000 sqm. We support Hounslow's acknowledgement that there remains a **substantial scale of unmet industrial need** in the West of the Borough following the allocations proposed. We strongly believe that the unmet need should be addressed through this version of Hounslow Local Plan.

The National Planning Policy Framework (NPPF) (2023) in paragraph 23 requires local plans and their strategic policies to address the objectively assessed needs over the plan period, which should include ‘allocating sufficient sites to deliver the strategic priorities of the area’. Arianda agree that exceptional circumstances exist to justify meeting substantial industrial needs over the plan period, however in not meeting the unmet need, we consider the plan does not accord with national policy, and is not fully justified and effective.

As set out in previous representations, Arianda are not seeking any amendments which would prejudice the minerals allocation and extraction coming forward.

The opportunity Rectory Farm provides and such amendments post extraction, reflect a site allocation which is positively prepared, justified and effective in meeting the industrial shortfall, to bring forward a Locally Significant Industrial Site designation.

Rectory Farm benefitted from a recently lapsed scheme (ref: 00315/E/P19) for sub-terranean warehouse and storage scheme, which is no longer viable due to the unforeseen economic changes after the Covid-19 pandemic. The principle of industrial at the site has been established and the site benefits from a sustainable location, including close proximity to Heathrow Airport and London’s strategic road network. Notwithstanding the planning background, the site is capable of providing industrial floorspace above ground, alongside a provision of public open space.

The site’s designation within the Green Belt is also not justified, particularly given the Council’s Green Belt reviews (document EBGB4 and EBGB4a), whereby the site was assessed as a sub-parcel ‘SA-4e’, specifically stating ‘if removed from the Green Belt the area is unlikely to result in harm to the wider Green Belt’. The review summarises that the Site performs ‘moderately’ in the overall performance against the purpose assessment criteria, although has a ‘**less important**’ (CBRE emphasis) contribution to the wider Green Belt. Arianda’s Regulation 19 consultation (respondent no. REP075) response comprises a more recent assessment, clearly identifying the site performs poorly when assessed against the Green Belt purposes and should be released.

Removing the Site from the Green Belt would enable the delivery of above-ground industrial and logistics floorspace, not inhibiting the minerals extraction/restoration process first, thus making a positive contribution to meeting identified needs in the west of the borough through its designation as a Locally Significant Industrial Site.

The modifications proposed below will help meet the unidentified industrial need in the West of the Borough, and would meet the soundness test in paragraph 35 of the NPPF, as well as accord with national and London Plan policy whereby allocations meet the objectively assessed need.

Question 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?

In reflection of the preceding sections and written responses throughout the draft Hounslow Local Plan consultation and examination by Arianda, the following modifications and suggested revised wording (in red) for the emerging Site Allocation 122 – Rectory Farm are set out below:

<p>Planning Designations</p>	<p>Site is within the Metropolitan Green Belt which was assessed in the Green Belt Review Stages 1 and 2. Proposals must be in accordance with Local Plan Policy GB1.</p> <p>Site is Green Belt which was assessed in the Green Belt Review Stage 2 (SA-4e) and is proposed to be released. Proposed Locally Significant Industrial Site (LSIS): Proposals within the LSIS should, where feasible, intensify uses suitable for broad industrial-type activities and should</p>
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	<p>consider the impact of development on existing occupiers in accordance with the Agent of Change principle.</p> <p>The site is an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</p> <p>Land Quality; Development will be subject to compliance with Policy EQ8 of the Local Plan and any subsequent policy in order that any contamination and any historic landfill is properly considered and addressed as part of any development.</p> <p>Site is within an Area of Special Advertisement Control: advertisements are subject to special conditions within this area (see Local Plan policy CC5).</p>
Proposed Land Uses	<p>Site will be developed for minerals extraction and provision of industrial floorspace with open space following minerals extraction/restoration process. and returned to open greenspace, as a new publicly accessible park.</p>
Key Proposal	<p>Development of the site for minerals extraction/restoration and restored parkland and redevelopment for employment use with a provision of open space (following minerals extraction).</p>
Land Uses	<p>Minerals extraction (temporary), industrial floorspace (B2/B8) and provision of open space. and parkland</p>
Heritage Constraints	<p>Heritage assets include but are not limited to:</p> <ul style="list-style-type: none"> • The site is adjacent to the Cranford Village conservation area • The site contains Grade II Listen Queen’s Head Public House and is near Grade II Listed Stansfield House <p>The proposed development could have an impact on the heritage asset listed above. Potential impacts include, but are not limited to:</p> <ul style="list-style-type: none"> • Impact to the setting of the heritage assets • Impact to the significance of the heritage assets <p>Development is required to conserve/preserve, and/or seek opportunities to enhance the historic environment where potential impacts upon heritage have been identified.</p>
Movement and Access	<p>Vehicle access for minerals extraction must ensure that traffic and road safety impact is minimised. Provision of high quality and appropriate walking, wheeling and cycle routes around the site and linking to existing infrastructure should be provided to ensure the safety of pedestrians and cyclists during these works.</p> <p>Appropriate pedestrian, cycle, and vehicular access and routes should inform the masterplan of the site.</p> <p>The park will need to deliver a new on-site pedestrian and cycling network, with defined gateways to the site.</p>

	<p>The delivery of the park should provide connectivity to other public spaces that are close to the site, such as the Cranford Countryside Park and the Crane Valley Park, which will enhance the overall open space network in the borough.</p> <p>This should be delivered through making provisions for connecting walking and cycling routes. The pedestrian and cycle routes and entrances to the site should also enable excellent connectivity with surrounding residential areas, to enable nearby communities to have convenient access to the new parkland.</p>
<p>Site Requirements</p>	<p>In accordance with national policy the Council should safeguard sites to protect its potential aggregate supply. This supply will contribute to the London wide apportionment of providing five million tonnes to 2041. The safeguarding of Rectory Farm as a potential extraction site will meet the borough’s London Plan apportionment of 700,000 tonnes.</p> <p>The proposed method of extraction will need to minimise any environmental impact on neighbouring residential areas, including noise, dust, subsidence and visual impacts.</p> <p>Proposals for redevelopment of the site for industrial uses and associated open space.</p> <p>Proposals will need to deliver a new landscaped sports and leisure park across the entire site, which will be accessible to the local community early in the process.</p> <p>The park should be delivered in parallel with the mineral extraction process continuing below ground. The park should be delivered as early as possible within the development programme to demonstrate the commitment of the developer to community benefits, and be designed to include a series of generous open spaces and activity zones that could include woodland areas, play facilities, nature trails, wildflower meadows, a cycle and/or running track, sports pitches and tree nurseries. All uses must be accessible development within the Green Belt, in accordance with Local Plan Policy GB1.</p> <p>The site is located within Flood Zone 1, and has a site area that is greater than 1 hectare. Development proposals will be required to submit a Flood Risk Assessment and comply with Policy EQ3 of the Local Plan or any superseding policy.</p> <p>The site is located within an area of surface water flood risk, as identified in the Hounslow Strategic Flood Risk Assessment (SFRA) Level 2 (2024). Proposals must submit a Flood Risk Assessment, and will be required to be delivered in accordance with the flood mitigation measures and requirements set out in the detailed site assessment in the SFRA Level 2.</p> <p>Development should achieve Air Quality neutral where possible. Development should demonstrate how an Air Quality Positive approach has been taken in order to maximise benefits to local air quality in accordance with the London Plan. Proposals must be accompanied by an Air Quality Assessment and be in accordance with Local Plan policy EQ4 and the London Plan.</p>

Respondent Number: REP075

I would be grateful if you could please confirm safe receipt of these representations and please do not hesitate to contact me should you wish to discuss any of the above.

Kelly Lippett – Director

CBRE on behalf of Arianda Property Holdings Ltd