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LB Hounslow Local Plan review Examination: Stage 2 EiP Hearing Statement

373 Hatton Road, Bedfont, TW14 9QS

JCAL Ltd

April 2026



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1.0 Introduction

- 1.1 This statement is provided in advance of the Stage 2 Examination in Public (“EiP”) Hearings for the Hounslow Local Plan. It is made on behalf of our client, JCAL Ltd, in respect of the site at 373 Hatton Road, Bedfont, TW14 9QS (“the site”), located in the London Borough of Hounslow.
- 1.2 We observe that the Council, following the Stage 1 hearing sessions, has prepared the following additional document EX57 – [Post Stage 1 Hearings Version of the Schedule of Suggested Modifications \(S11\)](#) (Last updated: 20th March 2026).
- 1.3 This Hearing statement sets out the position of our client considering EX57 with respect to the site.

2.0 Representations

- 2.1 Document EX57 “Post Stage 1 Hearings Version of the Schedule of Suggested Modifications (S11)” (Last updated: 20th March 2026) proposes amendments to the relevant text to now make reference to “site boundaries” See extract in Appendix A (“HLP_C2_36” and “EIP_C2_64”).
- 2.2 However, the position of the boundary to Site Allocation 57 "Airport Business Park", a Locally Significant Industrial Site (LSIS) is contested. We contend that the site at 373 Hatton Road, Bedfont, TW14 9QS is best to be included within the site boundary that includes Site Allocation 57 "Airport Business Park".
- 2.3 The rationale for combining these two sites is that they are consistent in land use terms. The existing use of 373 Hatton Road is an industrial use (see planning history documented in our representations made on behalf of JCAL to date) that is the same as the proposed LSIS of site allocation 57. Combining the sites would allow a better distinction to be made in land use terms between the residential use to the west that includes Myrtle Avenue and the industrial uses to the east that would include the combined sites of 373 Hatton Road and the LSIS site allocation 57.
- 2.4 Otherwise, the arrangement currently proposed would result in a poorly planned land use arrangement that we illustrate by travelling along Hatton Road from west to east as follows:

Residential use – industrial use (373 Hatton Rd) – vegetated buffer – industrial use (site 57)
- 2.5 Evidently this arrangement would be unsatisfactory. The Council has an opportunity to rationalise land uses through a more logical application of the Local Plan process.
- 2.6 In redrawing the site boundary to Site allocation 57 “Airport Business Park”, we acknowledge the intention to provide separation via the provision “vegetated buffer”. In any future redevelopment of the site at 373 Hatton Road, regard will be given to providing that separation.
- 2.7 Relevant diagrams, in particular, those supporting draft policy P2(c) “Land at Hatton Fields” should be amended to show the site boundary as including the site at 373 Hatton Road. Currently it is shown running through the centre of the neighbouring site, bisecting it. This is not acceptable. As per our representations to date, draft policy P2(c) is consequently not justified, effective, or consistent with national policy and, therefore, not sound.
- 2.8 To avoid discrepancy, the physical line depicted for site allocation 57 should enclose the site at 373 Hatton Road in all relevant diagrams purporting to site allocation 57. Most relevant is the diagram supporting draft policy P2(c). Changes should be made to this, and to all relevant diagrams.

3.0 Conclusions

- 8.1 This statement demonstrates that the proposed direction for draft policy P2(c) remains unsound since it is not justified, effective, or consistent with national policy and therefore not sound.
- 8.2 We set out in this statement how matters must be remedied with respect to the site at 373 Hatton Road to be included within a boundary that incorporates site allocation 57 "Airport Business Park", a Locally Significant Industrial Site (LSIS). This would consolidate existing industrial land uses.
- 8.3 In order for the new Local Plan to be found sound in accordance with the Regulations, we encourage the local planning authority to implement the proposed and suggested changes in its Major/ Minor Modifications before adopting the plan.



Appendices

- A. Extract of EX57 with reference to the JCAL representations made to 373 Hatton Road, Bedfont, TW14 9QS

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HLP_C2_36	P2 (c) Land at Hatton Fields	Figure P2.4	64	Amend 5 th item in the legend to remove the following wording shown in red: Vegetated Buffer between Industrial and Nature Uses	In response to representation from JCAL, and for clarification that the green buffer and planted tree margin will extend to the north of Hatton Road and east of Myrtle Avenue as shown in Figure P2.4
HLP_C2_37 (Superseded as shown below in EIP_C2_64)	P2 (c) Land at Hatton Fields	D	65	Protecting and enhancing the landscape character, environmental quality and the biodiversity value of the adjacent Site of Importance for Nature Conservation and supporting the delivery of landscaping, a green buffer and tree planted margins along the site boundaries with neighbouring open space to provide corridors for habitats;	In response to representation from JCAL, and for clarification that the green buffer and planted tree margin will extend to the north of Hatton Road and east of Myrtle Avenue as shown in Figure P2.4
EIP_C2_64	P2 (c) Land at Hatton Fields	D	65	D. J. Protecting and enhancing the landscape character, environmental quality and the biodiversity value of the adjacent Site of Importance for Nature Conservation and supporting the delivery of landscaping, a green buffer and tree planted margins along the site boundaries with	In response to representation from JCAL, and for clarification that the green buffer and planted tree margin will extend to the north of Hatton Road and east of Myrtle Avenue as shown in Figure P2.4

Modification code	Policy, Map/Figure	Paragraph/Clause	Page	Modification	Reason for modification
e.g. [HLP_C2_01]				neighbouring open space to provide corridors for habitats;	