



SITE ALLOCATIONS – LOCAL PLAN EIP 2026
PROPOSALS for
DE-DESIGNATION OF GREEN BELT –
HATTON FIELDS AND LAND AT DICK TURPIN WAY

Inspectors' questions: *Without prejudice to our considerations 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?*

We consider none of them are:

The London Plan re-affirms guidance in the NPPF guidelines for Green Belt land, which states:-

- A. *The Green Belt should be protected from inappropriate development.*
- B. *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.*

The proposals are Inappropriate because:

The land is part of Hatton Fields, a valued green space in the urban environment. The proposed development would harm the 'openness' of the rest of the Green Belt site (a NPPF requisite of Green Belt), compromise biodiversity, remove natural capital, and a key site for climate resilience. The plans are also an unscheduled use of Green Belt.

We gave evidence in the 2021 EiP, objecting to the proposals for the 100 acre Airport Business Park at Hatton Fields (though we knew it as Hatton Farm then), mentioning the importance of the area for nature conservation. But what we did not know was the amount of people who depend on the site for health and wellbeing. And although the plans were subsequently reduced, the northern part, together with the land at Dick Turpin Way, is still crucial.

The proposals are not effective because:

Land Use: They are not making effective use of land in the area, as stated in the opening para. of **NPPF Making Effective Use of Land:-**

Para124: Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed of 'brownfield land'.

They would also not be effective because: In practical terms, the proposed access in Hatton Road is essentially a narrow rural road, almost a lane in fact, bounded by housing, sports facilities and a school, impossible to widen and not suitable for HGVs turning in and out.

The Proposals are not Justified because:

Employment: The main reason given by the Council for the proposals in Policy ED 1 are to *“provide employment growth stimulated by the borough’s location close to Heathrow Airport and that justified by the Heathrow Opportunity Area, as set out in the London Plan.”*

As shown in our Reg.19 Submission – the key policies of the *Heathrow Opportunity Area* are for development to be sustainable, inclusive and represent ‘Good Growth’ and were never meant to involve Green Belt land. Mostly it is centred around the ‘Elizabeth line growth corridor’, the Hayes and West Drayton Corridor and Stockley Park.

The LONDON PLAN 2021, Chapter 1 Good Growth, **GG2 Making the Best use of land**, Paras A and F state:

To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:

- *Enable the development of brownfield land, particularly in Opportunity Areas, on surplus public land and sites within and on the edge of town centres, as well as utilising small sites.....*
- *Protect and enhance London’s open spaces, including the Green Belt, MOL, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.*

As mentioned during the previous hearing, the writer has registered an interest in receiving notice of warehouse vacancies in the area; lists of vacancies are received daily and we attach 2 pages of a sample (App1).

The Council alludes to the borough's close location to Heathrow to justify the proposals, providing for employment growth. We maintain that more warehousing is not required for employment growth – as there is a constant supply of vacancies in this sector. More warehouses would just meant more unfilled vacancies.

The proposals are also not justified because:

Warehouse figures: SEGRO maintain they need to build warehouses here due to 'unmet need' As we covered in the Stage one hearing, there are many vacant warehouses in the area of Bedfont/Feltham. As of 12th April there are 916 units, please see attached copy of 1st page of list (Appx.2). We also include the 1st page of the 658 properties existing in the Poyle area (Appx.3) Poyle is about a mile from Heathrow and the cargo terminal (See map, Appx.4.)

In addition there several sites nearby listed in the Local Plan for industrial development or intensification, which are:-

49 - Site at Faggs Road (3.5 Ha). Key Proposal: The site will be extended to provide additional industrial business space and units to support future employment needs.

46 – Ron Smith Recycling (2.5 Ha). Key Proposal: The site will be redeveloped to provide more intensive industrial use and a broader range of uses.....

45 – Land at Green Lane (3.1 Ha). Key Proposal: Land at Green Lane will be developed to provide new industrial space and units to support the boroughs future employment needs.

43 – Heathrow International Trading Estate (4.3 Ha). Key Proposal: The site will be redeveloped to provide new industrial business space and units to support thboroughs future employment needs.

Land at the Central Park Trading Estate (4.1 Ha) is also proposed for industrial development and release of its Green Belt status. We do not agree with this proposal and if it was released we trust a green corridor is left to link with the Crane Valley and Hounslow Heath. If it were to be released, the total alternative space nearby for development of potential warehouses/logistics amounts to 16 Ha. allowing some land retained for green corridors.

LAND AT DICK TURPIN WAY

This parcel of land sits between Hatton Fields and the Crane Valley (a SINCSite of Metropolitan Importance) thus providing a green link, or 'stepping stone' between the two. **NPPF Chapter 15, Habitats and Biodiversity**, para 192 states:

To protect and enhance biodiversity and geodiversity, plans should:

- a) *Identify, map and safeguard components of local wildlife habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; (68) wildlife corridors and stepping stones that connect them.....*

This land should also be protected, as apart from the above, it would also help mitigate the heat island effect, see below.

CLIMATE CHANGE

Since the plans were first drawn up to build warehouses on this Green Belt site, around 13 years ago, Climate Change has become a reality and very high temperatures are now a feature of London summers. Heathrow is usually the area of highest temperatures, creating a 'heat island'. We briefly touched on this issue in our Reg.19 submission and would further expand on the subject.

NPPF Chapter 14. Meeting the Challenge of Climate Change, Flooding and Coastal Change. Para 161

“ The Panning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks.....It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings.....”

The London Plan 2021: Policy 8.2.1 states “London’s Green Beltperforms multiple beneficial functions for London, such as combatting the urban heat island effect.....”

In July 2022 temperatures at Heathrow reached 40.2C for the first time! And in 2022 **the Met Office** issued a press release: “ **Heat in Cities** – the health impacts of a changing climate”, which states: “Health is already impacted by the weather, especially in urban areas, with heat in particular causing heat-related illnesses, exacerbating existing health conditions and excess deaths. In a changing climate, these impacts can be expected to increase”

Subsequently the Mayor of London developed the ‘**London City Resilience Strategy**’ in which Action A2 aims to:- “ Establish a network of cool spots to help Londoners deal with high temperatures during summer heatwaves. The frequency and severity of hot weather and heatwaves in London is projected to increase.....”

The NPPF update on Climate Change. Key Updates in the NPPF are:

1. *The December 2024 update explicitly references the UK’s legally binding target of achieving net zero by 2050, highlighting the planning system’s critical role in this transition.*
2. **Climate Change Considerations:** *New policies require planning applications to address a full range of potential climate change impacts. This includes considerations of flooding, overheating and other climate-related risks.*
3. **Paragraph 163:** *This paragraph mandates that the need to mitigate and adapt to climate change must be considered in preparing and assessing planning applications.....*
4. **Sustainable Development:** *The NPPF emphasizes that new developments should be planned to avoid increased vulnerability to*

climate impacts and should help reduce greenhouse gas emissions through thoughtful location, orientation and design.

Hounslow Council has recently consulted on a '**Climate Change Resilience Plan**' in which the "*Climate Risks of Surface Water Flooding and High Temperatures & Heatwaves are rated as Very High in the borough*"

Yet the Council still wants to enable Segro to build warehouses on Hatton Fields, a key site for climate resilience, which also sequesters carbon. Close to Heathrow, the area can suffer extreme temperatures in heatwaves, as shown above. Warehousing on the northern part of the fields and associated activities can only worsen conditions, and the Council seem not to care about safeguarding its residents in this vulnerable area.

Many scientific papers have been produced on the subject, such as that from University of Surrey's Global Centre for Clean Air Research, whose press release in April 2025 states:- "*Trees, parks wetlands etc, can no longer be seen as 'nice to have' aesthetic enhancement but a vital component for creating climate-resilient, healthier and more equitable cities*" Ref: <https://www.sciencedaily.com-releases>

However, the solutions in these and other publications to the urban heat island are mainly 'add-ons' – an attempt to remedy the conditions by installing greenery in built up areas. But Hatton Fields is producing these services already, nothing else needs to be done, except to leave the northern part in the Green Belt as it is!

BIODIVERSITY

The London Plan 2021, Chapter on BIODIVERSITY, states:

The section starts: "*London is a diverse city, reflected not only in its population but across its landscapes and wildlife too. Its this mix that makes London special and we want to do all we can to look after it.*

*Interwoven with the city's buildings, roads and train lines are wilder spaces and valuable habitats **such as grasslands rich with wild flowers**, rivers and ancient woodlands (our emphasis).*

Along with other green and blue open spaces.....they provide shelter and food for a wide range of wildlife. Over 14,000 different species of plants, animals and fungi have been recorded in London, many of which are permanent residents...."

And In the Mayor's recently published 2026 '**London Nature Recovery Strategy**' his Forward states:

".....Nature is essential for our health and wellbeing and provides a vital home for local wildlife. It also builds our resilience to the climate crisis by cooling our cities and reducing the risk of flooding. Yet despite its immense value, nature is in decline globally, and the UK is one of the most nature-depleted countries in the world."

A Habitat Survey was compiled by Salix Ecology on the whole site, before the publication of the Single Local Plan (we understand this has been supplied) and we would highlight some key findings.

On Field A, the largest field on the whole site

Para 3.2.4 *“A horse-grazed pasture to the north of the site was particularly species-rich with a good range of forbs (herbaceous flowering plant other than grass) reflecting the structural diversity of the sward resulting from grazing.”*

And in chapter 6 *Discussion:- “Hatton Fields is a large site supporting a range of habitats, including lowland deciduous woodland and hedgerows which are priority habitats, and is clearly of borough value. The neutral grassland habitat is particularly significant.....*

Although no particularly rare vascular plant species were recorded, a number of the species, including common centaury, ladies bedstraw, common birds foot trefoil, mouse-ear hawkweed and common knapweed are associated with unimproved, i.e. species rich, neutral grasslands of high conservation value. There were also a good number of Axiophytes and London Notable Species, especially associated with neutral grassland areas.”

Birds: Many species of birds use or frequent Hatton Fields. some are listed as *UK Biodiversity Action Plan Priority Species*, some are of *London BAP Priority Species* and many are listed as *London Species of Conservation Concern*.

Bats: Several species of bat have been recorded, mostly on the fields nearest to the horse paddocks. These include Serotine Bat, Noctule Bat, Common Pippistrelle and Soprano Pipistrelle – all *London BAP Priority species*. The Soprano Pippistrelle is also listed in HabRegs2 and in Sect.41: *Species of Principal Importance in England*.

Insects: The insects recorded include three *London Species of Conservation Concern*, three *London BAP Priority Species* and three *Sect.41: Species of Principal Importance in England*. As well as the latter status the *White-letter Hairstreak butterfly is also on the Red list as Endangered*.

Biodiversity Net Gain: This requirement aims for a development to leave the environment in a measurably better state than before and result in more, or better quality, habitat than before the development.

This may be possible when developing brownfield, degraded or contaminated sites, but not on 40 acres of Green Belt consisting of grassland, hedgerows and mature trees. The development would destroy most of the habitats, which a few bird and bat boxes could hardly replace.

As we stated in our Reg.19 submission on Hatton Fields, *The whole site contains a mosaic of habitats which together make up a valuable ecological resource*. The northern part is mostly grazed, therefore providing habitat for different species to the meadows in the southern part.

The foregoing survey demonstrates that the site proposed for development is actually of high conservation value for London, not ‘just local’ as the Council maintains.

AIR POLLUTION

Though we spoke on this subject in the Stage 1 hearings, we would like to quote from the relevant sections of the **NPPF 2024 section N0.15**. Conserving and enhancing the natural environment.

Habitats and biodiversity

“198. Planning policies and decisions should also ensure that new development is appropriate for its location, the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment.....

199. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking in account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.”

As we mentioned at the previous hearing, The GLA has identified **Air Quality Focus Areas**, (AQFAs) which ‘*not only exceed the EU annual mean limit for nitrogen dioxide (NO₂) but are also locations with high human exposure*’. Heathrow and its immediate surroundings sit in an AQFA.

We also mentioned **The London Plan 2021 Chapter on Sustainable Infrastructure**, “Policy S1 1 Improving Air Quality:

B) To tackle poor air quality , protect health and meet legal obligations, the following criteria should be addressed:

1) Development proposals should not:

a) lead to further deterioration of existing poor air quality

c) create unacceptable levels of exposure to poor air quality

2) In order to meet the requirements of Part 1, as a minimum:

a) Development proposals should be at least Air Quality Neutral

c) Major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1.”

The International Journal of Geography, Geology and Environment, published the article “*Urban Green Spaces and their Role in Enhancing Air Quality* in 2022:-

Introduction: Urban green spaces have become increasingly essential in modern city planning due to their multifaceted benefits, particularly in enhancing air quality.....

These spaces act as natural air filters, removing pollutants such as particulate matter |(PMs), nitrogen dioxide (NO₂), sulphur dioxide (SO₂) and ozone (O₃) through various mechanisms. Vegetation can capture airborne particles on leaf surfaces, absorb gaseous pollutants through stomata, and promote chemical reactions that

neutralize harmful substances. Furthermore, green spaces help regulate urban temperatures by providing shade and through processes of evapotranspiration, which cools the air and reduces the formation of ground level ozone.”

It is surely obvious that building warehouses on the green spaces in the area, which mitigate the effects of poor air quality, air pollution in Hatton and Bedfont would only increase to even more serious levels. Not only would they eliminate the service tgreen spaces provide, but the operations of the industry proposed would further exacerbate air pollution.

Hounslow Council produced a document, *Air Quality Supplementary Planning Document, March 2008, titled ‘ Assessment of the **Impact of New Development on Air Quality**’*. The introduction states:

“1.1.1 This document provides technical advice on how to deal with planning applications that could have an impact on air quality. If he procedures in this document are followed it will help ensure consistency in the approach to dealing with air quality and planning in Hounslow.”

It seems, from the image on page 10, attached (App.4) the procedures were not followed, as the plans to build warehouses in this area of high air pollution were proposed **at least four years after this documented was produced!** Although the size of the proposals have been reduced, one wonders why they were conceived in the first place!

CONCLUSION

The proposals are contrary to Hounslow’s own guidance on green infrastructure, climate resilience and air quality; they are not effective, justified or consistent with national policy or in conformity with the London Plan

Appendices 1 – 5 attached

Rose McManus, Friends of the Earth Hounslow Borough

Email: rose.mc@btinternet.com

Appendix1a, Warehouse job vacancies, first page of 3 –

 Outlook

38 New Warehouse jobs in Hounslow

From FindEveryJob UK <findeveryjob@workcircle.com>

Date Wed 15/04/2026 09:13

To rose.jackson1@outlook.com <rose.jackson1@outlook.com>

FindEveryJobUK

Here are 20 of **38** new jobs matching your alert: [Warehouse jobs in Hounslow](#) - [click here](#) to see the rest.

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More info

[Branch Manager](#)
Feltham, London, South East, UK

More info

Branch Manager

Feltham, GB

[More Info](#)

Cargo Agent

Feltham, Middlesex, United Kingdom

[More Info](#)

CARGO Driver.V

Feltham, London

[More Info](#)

AIRSIDE CARGO Drivers

Feltham, London

[More Info](#)

Warehouse Forklift Operative

Feltham, England, United Kingdom

[More Info](#)

Forklift Driver Warehouse Operative

Hounslow, England, United Kingdom

[More Info](#)

Warehouse Manager

Feltham, England, United Kingdom

[More Info](#)

Yards Man

Lambourn Woodlands, England, United Kingdom

[More Info](#)

Appendix 2, Vacant Warehouses in Bedfont/Feltham – 1st page of many! List available from NovaLoca



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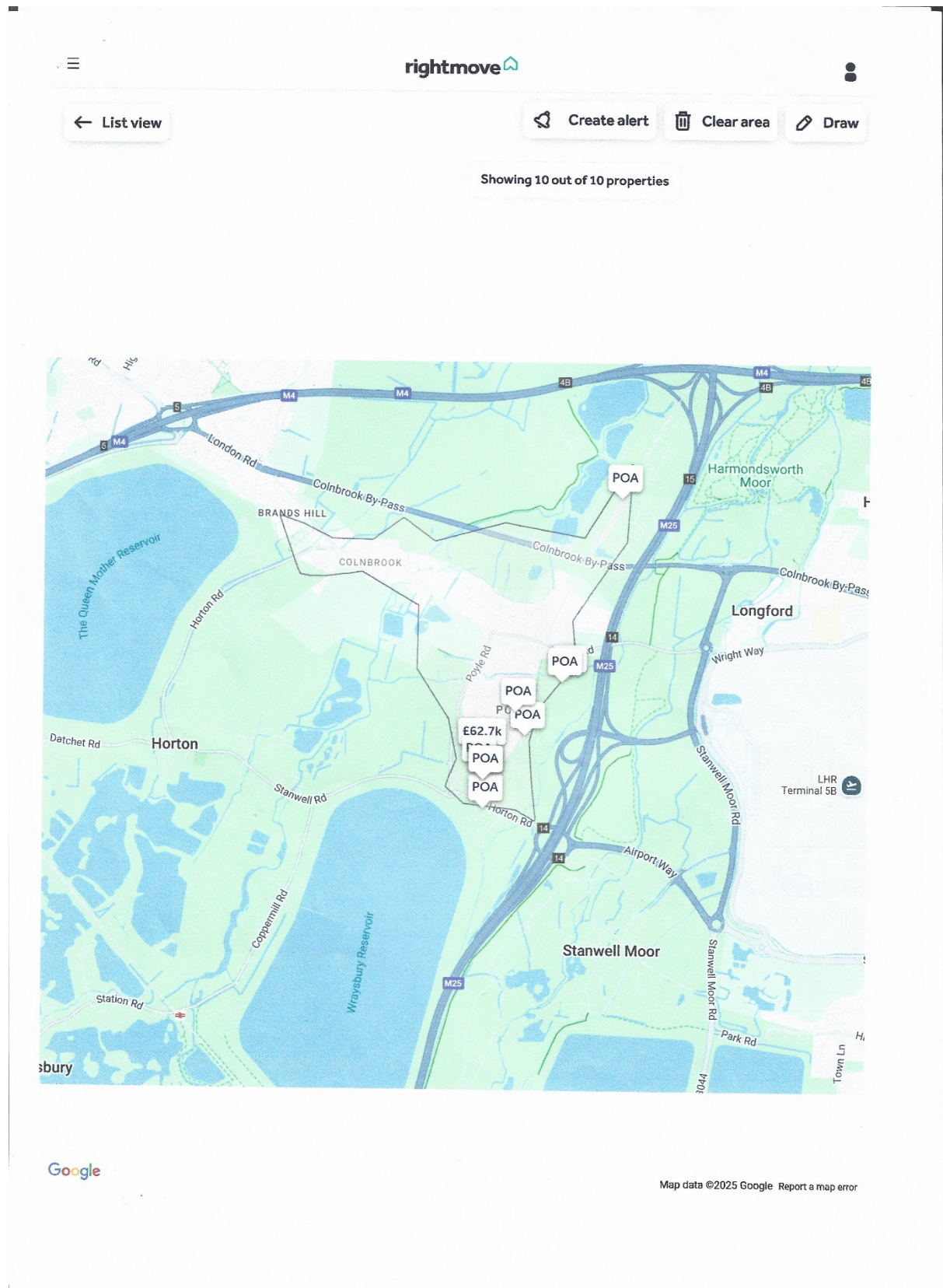
Alex Kington
Logix Property LLP
020 3151 5633



Gus Haslam
Knight Frank Industrial & Logistics (London)
020 3151 9352



Appendix 4, Map showing Poyle in relation to Heathrow. (Showing vacant properties from one agent, but not all.



Appendix 5, Page from L.B. Hounslow doc. showing Image of air pollution at Heathrow.

the Greater London Authority Act 1999, the Mayor for London produced an Air Quality Strategy setting out how the National Strategy will be implemented in London as a whole. London Borough Action Plans need to have regard to the Mayor's Strategy.

1.3.3 By 2006, all but one borough had declared AQMA(s) for nitrogen dioxide (NO₂) and/or fine particles (PM₁₀). The major cause of air pollution in London is road traffic, although, around Heathrow, emissions from aircraft and associated on-airport traffic are an additional source. Other notable contributions come from industrial plant and premises, domestic energy production and construction activity. It should be remembered that background pollutant concentrations in London and the South East are heavily influenced by weather systems that also affect northern Europe.

1.3.4 An air quality update was presented to the Executive of Hounslow Council in 2004 where it was shown that more of the borough was predicted to exceed the prescribed standard for Nitrogen Dioxide. **Figure 1** below shows the modelling that supported this prediction. The decision was taken to declare the whole Borough an Air Quality Management Area and this decision was ratified in 2005.

Figure 1 – Projected annual mean NO₂ concentrations in and around London Borough of Hounslow in 2005 (source: CERC 2002)

