

23 September 2019

Dear Sirs,

**CPRE London Response to Hounslow’s West of Borough Local Plan Consultation**

CPRE London is a membership-based charity with 2,500 members across London concerned with environment and planning issues.

The proposed Green Belt release of 125 hectares in the London Borough of Hounslow’s West of Borough Local Plan consultation, is unjustified, unnecessary and in breach of both London Plan and national planning policy and plan is therefore unsound. We strongly oppose the proposed extensive damage to Green Belt which we estimate amounts to loss to development of 10% of Hounslow’s Green Belt.

1. The council has **failed to properly consider** **alternatives** to allocating Green Belt for development as required by the NPPF[[1]](#footnote-1) and, specifically, it has failed to demonstrate why it does not consider
   1. intensification of existing industrial estates nearby to Heathrow
   2. higher density on sites identified for housing
   3. other sites in the borough which are either in need of regeneration or which make poor use of space and
   4. the potential for use of sites in neighbouring borough Hillingdon, especially extensive surface car parking space,

as more sustainable alternatives to releasing Green Belt.

1. **The conclusions of the** **Borough’s** **Green Belt Review are unsound because the Green Belt sites which Hounslow proposes to release do meet the Green Belt purposes.** The conclusions of the most recent review are highly subjective and contradict even the council’s own previous review which concluded that all Green Belt sites in Hounslow met Green Belt purposes. The review seems to have been conducted to identify land for development rather than make an objective assessment of Green Belt.
2. **The council has not justified development on Green Belt sites in terms of sustainable development.** No clear assessment has weighed up the impact of the substantial proposed damage to Green Belt against potential gain so it is not possible to make a judgement about whether the loss of Green Belt demonstrates ‘sustainable development’ as required by the NPPF. Additionally, **the council’s assessment of the ‘value’ of the Green Belt land is invalid.** The borough has sought to present the large pieces of Green Belt land which it wishes to release for development as low value. However, it has failed to make clear or take account of the important current value of this land in terms of
   1. containing the environmental and social impacts of urban sprawl
   2. stopping towns from merging
   3. managing water, temperature and air quality in Hounslow and beyond
   4. providing a more densely populated area with vital open green space and/or sports pitches now and in future
   5. protecting nature (many of these sites are also valuable SINCs (Sites of Importance for Nature Conservation).
3. **Related to this, the council has not attempted to plan positively for the future gain that the Green Belt sites (those proposed for release) can bring to the borough providing they remain Green Belt.** TheNPPF states “**141.** …local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land” but there is no evidence that Hounslow has taken this approach.
4. **No sound justification is given for change of designation from Green Belt to Metropolitan Open Land** for the sites proposed: they serve important Green Belt purposes including separation of towns, halting urban sprawl and promoting urban regeneration and they are clearly countryside in character. The Council has sought to present Green Belt as being only the outer boundaries of London but the Metropolitan Green Belt was never just an outer boundary and it is a clear re-writing of national and London policy to characterise it in this way. The proposed re-designation of these sites is unprecedented and entirely unjustified and would set a dangerous precedent if adopted.
5. **The argument that there are Exceptional Circumstances to justify Green Belt release, based as it is upon the need for housing and commercial space, it flawed**. First, these cannot be argued to be exceptional when they apply to all London boroughs and when the Secretary of State has clarified that housing need cannot justify exceptional circumstances needed to release Green Belt. Second, the borough has based its argument for Exceptional Circumstances on the fact that it disagrees with the Draft New London Plan (DNLP) [Extract from ‘exceptional circumstances’ paper pp14/15 “*Hounslow Council… considers that the proposed approach to Green Belt land should allow for flexibility in recognising that land which no longer meets the purposes of the Green Belt can contribute to good growth”*] and that it believes it should be able to take into account *‘the increasingly likely scenario’* of a third runway at Heathrow. Neither of these are current planning policy and cannot therefore form the basis of an argument.
6. **Hounslow has accepted** **exceptionally high housing targets without appropriate justification** except to state that the borough is ‘pro growth’. This fails to assess
   1. the reality of what is likely to actually be constructed per year
   2. whether the borough could adopt a very challenging and ambitious target *without* Green Belt release (which we believe it could)
   3. the risk that allocating Green Belt sites will encourage an ‘easy’ push into countryside instead of forcing the redevelopment of the urban footprint. There is a very real possibility that the very large number of brownfield sites which it has identified will sit idle while Green belt sites are brought forward – undermining the Green Belt purpose of promoting regeneration of previously developed land.
7. Where boroughs are **constrained** by Green Belt this can be cited as a reason for reducing housing targets however the borough has chosen not to consider Green Belt a constraint nor to make clear to consultees that this was an option, nor why it was ruled out.
8. **The Consultation fails to make clear the extent of changes to Green Belt and is misleading.** It states that the borough’s aim is to preserve Green Belt (p30) and that a ‘small number’ of green belt releases are justified but fails to make clear that 125 hectares are proposed for release and fails to state in the Site Allocations which sites are Green Belt (it presents the sites as already released). This renders the consultation invalid. Page 31 states that the Borough’s strategic objective 10 is “To protect and enhance the borough’s Green Belt, Metropolitan Open Land, open green spaces and create more accessible MOL and open spaces” and yet it is proposing to release 125 hectares or 10% of its Green Belt. It states also that “The Council considers that exceptional circumstances are demonstrated justifying a small number of Green Belt releases..” (p60) but this cannot be regarded as ‘small’ by any comparison.

**Site Allocations – showing Green Belt and Sites of Importance for Nature Conservation (SINCs).**

<https://hounslow.app.box.com/s/pagw8ymuwrklwb2uysouhob2vanqal1w>

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| --- | --- | --- | --- | --- |
|  |  |  |  | Size (hectares) |
|  | **Sites which are proposed for removal from Green Belt without sound justification** |  |  |  |
| 38 | ‘Heathrow Gateway’ – Green Belt. Also a SINC, scheduled ancient monument and Archaeological Priority Area | Green Belt | SINC | 31.9 |
| 39 | ‘South Bedfont’ – SINC | Green Belt | SINC | 10 |
| 40 | ‘Bedfont Gardens’ – SINC | Green Belt | SINC | 6.9 |
| 41 | ‘Bedfont Gardens’ / land at Southville Crescent | Green Belt |  | 1.5 |
| 44 | ‘Central Park Trading Estate’ – adjacent to SINC. Several trees subject to TPO. | Green Belt | Adjacent to SINC | 4.1 |
| 46 | Ron Smith Recycling, Green Lane – adjacent to SINC, Flood Zone, Archaeological Priority Area | Green Belt | Adjacent to SINC | 2.5 |
| 48 | Vacant land at Dick Turpin Way – TPOs, BAA Public Safety Zone | Green Belt |  | 3.8 |
| 49 | Site at Faggs Road – adjacent to SINC, BAA Public Safety Zone | Green Belt | Adjacent to SINC | 1.8 (approx. half is GB) |
| 57 | ‘Airport Business Park’ – Adjoins SINC | Green Belt | Adjoins SINC | 47.1 |
| 58 | Lower Feltham West – SINC | Green Belt | SINC | 2.3 |
| 77 | Land South of Western International Market | Green Belt |  | 14.4 |
| 78 | Land at Hartlands Caravan Park – Traveller allocation | Green Belt |  | 2.4 |
| 79 | Baber Bridge Caravan Site – Traveller allocation | Green Belt |  | 0.8 |
|  | 125.49h without traveller allocation | Green Belt |  |  |
|  | 128.69 inc traveller allocation | Green Belt |  |  |
|  | **Sites which should remain open space / retained as useful open green space** |  |  |  |
| 42 | Land at Bedfont Lakes (West) 753 Staines Road, Feltham – Does not appear to be GB according to CPRE map but is listed by Hounslow as ‘Metropolitan Green Belt’ in site allocations | ? |  | 6.8 (seems wrong: more like 2.5h) |
| 45 | ‘Land at Green Lane’ – disused allotments | Allotments |  | 3.1 |
| 73 | Land at Nene Gardens | Local open space |  | 0.3 |
| 89 | Local open space should be retained as part of Inwood Park | Local open space |  | 0.5 |
| 64 | MoD – flat open space | Retain for sport |  |  |
| 84 | Barracks – flat open space | Retain for sport |  |  |
|  | **Other comments on sites** |  |  |  |
| 56 | Land at Glebelands Road – this appears to encroach onto park | Retain as park |  |  |
| 34  &35 | Former Natwest Bank Site and B&Q Chiswick could be combined and roadspace reclaimed to create a larger site |  |  |  |

**Sites proposed for change from Green Belt to Metropolitan Open Land**

Additional sites are allocated for change from Green Belt to Metropolitan Open Land but these are not listed in the Site Allocations. The justification for changing the designation of these sites is also unsound.

Yours faithfully

Alice Roberts

Head of Green Space Campaigns

CPRE London

70 Cowcross St

London EC1M 6EJ

07792942691

[alice@cprelondon.org.uk](mailto:alice@cprelondon.org.uk)

[www.cprelondon.org.uk](http://www.cprelondon.org.uk)

1. NPPF Para 137. 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 need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

   (a) makes as much use as possible of suitable brownfield sites and underutilised land;

   (b) optimises the density of development in line with the policies in [chapter 11](https://www.gov.uk/guidance/national-planning-policy-framework/11-making-effective-use-of-land) of this Framework, 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

   (c) 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. [↑](#footnote-ref-1)