Response to MIQs

Public Hearing for Hounslow Council's London Plan Review – 13th May 2026 – site 57 Hatton Fields

Friends of Hatton Fields is a community organisation with members in excess of 600 people. We have previously submitted objections to the Local Plan at Regulation 18, 19 and at the first set of hearings. As part of Regulation 18 we had confirmation from the Council that our petition of over **1,000 signatures** against the development of Hatton Fields would be included.

The MIQ Matter 9, question 9 from Inspectors reads:

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?

Friends of Hatton Fields would like to submit the following points:

Are the requirements justified?

No. Friends of Hatton Fields has provided data showing that there is an increasing trend of industrial units to let in a 5 mile radius of Heathrow airport. Friends of Hatton Fields reject the counterargument made in the first hearings by the council that assessment should not be made on advertised properties to let because they may be advertised but not necessarily vacant. Investing money in advertising a property is not going to be justified in the property is not available to let. The cost benefit for advertising would not stand up if the vacancy were "speculative" towards the end of a lease contract. In addition, there are several sites that are consistently being advertised as available over the 36 months. By attempting to disregard Friends of Hatton Fields data and insisting that the only data that should be used is from a database that is inaccessible to the public, the council are effectively making it impossible for the general public to dispute their assessment but creating inequitable exclusivity to the data.

Since the first hearing, Friends of Hatton Fields has once again reviewed the industrial units advertised as available and on 10th April the numbers are (with a recap from previous snapshots):

March 2023 – total of 368,000 square metres of unit space available to let or for sale
September 2024 – total of 523,000 square metres of unit space available to let or for sale
October 2025 - total of 618,000 square metres of unit space available to let or for sale
April 2026 – total of 416,909 square metres of unit space available to let or for sale

For reference we have attached an appendix of all the data.

There remains an upward trend of availability. Either this is all unwanted space or its in the wrong area or wrong design. Regeneration of unwanted existing industrial sites should come first before putting a bulldozer over green belt land. If we allow wealthy developpers to turn away from the more expensive regen opportunities, we will effectively be disregarding the goal of brownfield first and putting shareholders needs over and above those of the community.

Are the proposals effective?

From a community perspective, no. The cost of losing any of this valuable green space is too high vs the accepted goal by the council to meet the alleged unmet needs of the commercial logistics industry. The original argument by the council was that the development of Hatton Fields for warehousing was to meet job creation targets. We have challenged that claim:

- logistics is likely to be the fastest automating industry in the country

- there are already warehousing job vacancies in the area

- the west of the borough should be moving away from its dependence on low skilled, low pay warehousing jobs. It is unfair that the west of borough continually is supressed in a poverty trap with low aspirations for our communities that are seriously struggling with the current economic situation and consequential social impact.

In the first hearings the Council stated that this is less about defining exact numbers of jobs but more in recognition that there is (allegedly) an unmet need economically and therefore the plan aims to meet that need in the spirit of needing to see growth. In other words, this isnt for the community, its for wealthy businesses and shareholders.

Are the proposals consistent with national policy and in general conformity with the London Plan 2021?

No.

NPPF states that there should be extenuating circumstances to de-categorise green belt and move green belt borders. See above data showing that there are sufficient advertised industrial units to let or for sale within 5 miles of Heathrow airport.

NPPF states that the green belt should be protected if developing it will threaten unique characteristics of the areas concerned. See previous submissions from Friends of Hatton Fields. The proposals threatens to dominate the entire area with industrial use land. A huge swathe of industrial use will stretch from Heathrow, across the north end of Bedfont, joining up with the existing delapidated North Feltham Industrial Estate all the way to Green Lane (also with development plans). Bedfont is a semi-rural small village with a strong identity that will be lost with these plans.

Clause 149 of the NPPF offers exceptions which could be applied to justify the development of Hatton Fields. None of the exceptions apply to this plan and its proposals for Hatton Fields. The only possible exception is "limited infilling of villages". However, Friends of Hatton Fields argues that the overall impact of 7m high warehousing on this land would not be considered as "limited" and as explained, the consequential damage to the unique characteristics of the village should set this exception to one side. Clause 150 also does not apply.

Clause 153 states that "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures53. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure." Friends of Hatton Fields has already presented the simple facts that:

1. this area of green space is our local green lung. It absorbs huge volumes of water from our increasing rainfall and it mitigates against the urban heat effect (exasperated also in this case by neighbouring Heathrow). Please refer to previous photographs of the extent of surface water in our area and on our fields. Clauses 159-160 also refer concerning flood – we consider our area a flood risk and concreting over this valuable land could increase this risk.
2. The Duke of Northumberland River runs on Hatton Fields periphery. This river could hold more water if it were meandered into the fields, scratchings put in place and consideration of new areas of wetland. Already nature is creating wetland areas on the field in winter months. Concreting over this important natural sponge surely is not in line with the NPPF section on climate change.
3. Creating more industrial use, most likely as a 24/7 operation, attracting more HGVs into our community next to 2 major schools, sports fields with kids playing football, the urban farm with families outside enjoying the not-so-clean air is madness. This does nothing to improve our air quality nor reduce carbon footprint. Clause 186 refers. The plans would seem to be in contradiction to the intent of this clause within the NPPF.

4. This area is offering a high quality biodiverse field (see our ecological report by Salix) which the proposals threatens to destroy. Friends of Hatton Fields has also offered to the Council to plant more trees in hedgerows (rejected) and carry out low-impact grass cutting to increase the biodiversity of the site. Clauses 174, 179 and 180 refer. The plans would be in contradiction to the intent of these clauses within the NPPF.

The London Plan supports the principle of brownfield first. I refer the reader back to the data provided above and attached as an appendix. Regeneration opportunities are there (see our reg 19 submission and appendices). At the first hearing representations were made to the effect that current office space is undesired at Bedfont Lakes and could be repurposed for Industrial use. We know that the original plan for Rectory Farm (also in the Local Plan, site 122) was to extract minerals then return the site to become industrial units plus a public park but now the developpers are suggesting they leave the site as an open mine. The community is campaigning this is not allowed to happen yet we are not seeing the Council enforce the community's desire that the plan to build underground industrial warehousing with a public park is reinforced. How does this fit with the suggestion the council is trying to fulfill unmet demand yet they let a developper retract from fulfilling the plan. Wouldn't it be better to enforce this development, build warehousing on a mineral extraction site and leave the high quality habitat of Hatton Fields alone? We have not seen any serious response to this suggestion nor the suggestions made by Friends of Hatton Fields.

Please refer to our longer and broader reg 19 response where we also refer to other national policies and legal frameworks.