

Outer London Commission

Response of London Borough of Hounslow

The Outer London Commission

The Outer London Commission (OLC) has reconvened to investigate three themes that will help to inform a full review of the London Plan from 2016. The three themes are:

- Options for growth
- Relationship with the wider south east
- Barriers to housing delivery.

Summary

Themes of the following paper:

- LBH is a uniquely positioned western London borough located adjacent to Heathrow Airport. This makes its growth strategically important on the growth corridors and routes to and from central London, and perfectly placed to capitalise on Heathrow Airport as a generator of economic activity;
- LBH also contains a strategically important employment area in Brentford. The 'Golden Mile' Great West Corridor SOLDC (London Plan designation) provides a cluster of media industries that benefit from co-location and ensure that this country can play an active part in an important global industry;
- LBH is meeting its housing targets set out in the London Plan (amended 2015) and is actively seeking to augment its supply by utilising opportunities available to it. This includes taking opportunities within its town centres – particularly Hounslow and Brentford – as well as regeneration in Feltham, which is partly fuelled by the opportunity it has to create new housing and employment close to Heathrow. The Council has bid for Opportunity Area status in the Great West Corridor as well as now actively seeking to progress the Heathrow OA;
- LBH would advocate a further growth option that looks strategically at the metropolitan green belt. As part of the adoption of its borough plan, LBH has committed to a green belt review in the west of the borough. This is to be confirmed in the new Hounslow Local Plan (to be adopted on 15th September 2015);
- whilst LBH can plan for its own area, many of the matters that it seeks to influence are also dependent on neighbouring authorities. LBH would welcome a coordinated approach to meeting growth needs and would work co-operatively to achieving these. Indeed, in respect of this and with particular reference to Heathrow, LB Hounslow is being proactive in ensuring a co-ordinated approach to Heathrow and other growth matters, and is convening an initial sub-regional meeting next week;
- LBH proposes an early review of the Local Plan focussing on the links with Heathrow and the strategically important employment cluster at the Great West Corridor. These need addressing through the review of the London Plan;
- development in London is not simply a housing numbers game. It is essential that the provision of a range of housing types and sizes is complemented with improved infrastructure, community facilities, retail and commercial opportunities, job creation and the ability to reach these things easily. Schools are a particular issue. LBH is looking to create a balanced economy for the borough but its proximity to Heathrow and the 'Golden Mile' also create opportunities for those beyond the borough boundaries;
- the London Plan is not simply about strategic patterns. There are important patterns occurring at a lower level that are important to address, such as the role of trading estates and travel to work that is not dependent on central London (particularly for less well paid workers).

1.0 Introduction

- 1.1 The London Borough of Hounslow (LBH) lies in the west of London, bounded by the LBs of Hammersmith and Fulham to the east, Hillingdon to the west, Ealing to the north and Richmond to the south. To the south west is the Borough of Spelthorne, which is outside of Greater London.
- 1.2 LBH has prepared a borough wide Local Plan which is due to be adopted on 15 September 2015. This will replace the existing UDP, which dates from 2003, and the two DPDs for employment development and for Brentford. The borough wide plan ensures that LBH has an up to date vision and strategy for the borough going forward.
- 1.3 The plan contains a policy commitment to quickly review the Local Plan in two specific areas – the Great West Corridor (policy SV1) and the West of the Borough (SV2). This recognises the need to continuously explore ways to unlock further growth whilst satisfying the presumption in favour of sustainable development. It also meets the requirement, set out in the London Plan (2015), for local plan targets to be augmented with extra housing capacity to close the gap between identified housing need and supply.
- 1.4 There are a number of strategic issues that are important to the Borough in the coming years. These include:
- the continuing success of the Great West Corridor as a strategic employment location;
 - growth and improvement of the west of the borough
 - the relationship with Heathrow Airport;
 - the continuing success of the borough's town centres at Chiswick, Brentford, Hounslow and Feltham;
 - meeting development needs in the future, particularly housing and educational needs;
 - protecting and enhancing green spaces, and the future of green belt and metropolitan open land;
 - the role of new transport links to and through the borough, particularly in respect of the Borough's key locations to transform growth potential and enable additional sustainable growth. (e.g. passenger services on the Brentford- Southall branch line, new service links from Hounslow to Old Oak Common, and the new Southern Rail Access route to Heathrow (with additional station) from the Waterloo corridor.
- 1.5 Given its proximity to Heathrow Airport, LB Hounslow will play an important role in the development of London as a world city in the years up to 2050. Whilst the London boroughs have a duty to the city to ensure that it:
- maintains sufficient housing for its residents;
 - creates employment to ensure the economy grows in a globally competitive environment;
 - provides the infrastructure to support these transactions, and
 - nurtures the individual character vested in its historic built and green environment,
- Hounslow also has a duty to meet its needs for its residents in its part of the city. Hounslow's experience and contribution to the debate may also be skewed by its location adjacent to Heathrow airport.
- 1.6 We contribute to the debate that the Outer London Commission has started within this context whilst having regard to the questions the OLC has used to guide responses.

2.0 Options for growth

- 2.1 LBH acknowledges the need to meet the growing demand for housing from within and outside London. The London Plan (FALP, March 2015) prescribes a ten year target for LBH of 8,222 homes to 2025, an equivalent figure of 822 homes per year. LBH believe that this figure, despite being a significant increase on the previous London Plan¹, still falls well beyond the fully objectively assessed need for housing, which is likely to be closer to 1,350 units per year. We are commissioning a SHMA for the borough imminently.
- 2.2 LBH has consistently delivered on housing units against the London Plan 2011 target, and is expected to achieve completions beyond the 822 figure in the first years following the adoption of the raised target. LBH is also working with the Mayor in delivering new housing in the borough's main town centres, notably Chiswick and Brentford and the Housing Zone designation in Hounslow town centre. Each of these should provide sufficient scope to ensure that the first half of the FALP plan period delivers a number of new housing units that meets or exceeds the FALP target, and goes towards meeting full needs. A bid will be made for Feltham under the Housing Zones programme.

Balance

- 2.3 However, LBH believes that this is not simply a numbers game. The provision of a suitable mix of housing (including family and specialist needs) should be co-ordinated with the provision and creation of jobs, the recognition and delivery of required infrastructure to support growth, support for town centres as a place where retail and commercial activities are focused, the delivery of supporting community and cultural facilities to ensure a good quality of life and the protection of built and natural environmental assets to ensure that places have character, interest and space to escape from urbanity.
- 2.4 The balance between these land uses is difficult to define as within a single local authority area all of the factors that determine this growth are not under its control (though we can be an influencing factor). In Hounslow's case, the future growth of Heathrow with or without a third runway is likely to have a significant impact on the west of the Borough, but only some of that impact is directly within the council's control (although the Council is being proactive in sub-regional co-ordination).

Growth Scenario

- 2.5 What seems apparent is that the trend based projection (the OLC option 1) is unlikely to occur in reality. In Hounslow, the housing target has increased markedly between the London Plan of 2011 and the London Plan (2015), with the actual need thought to be well beyond the FALP requirement. Given that LBH are already looking to augment that target by utilising further opportunities within the town centres and around Heathrow (especially at the Heathrow Opportunity Area and in light of the Davies Commission's recommendation), it would already appear that the long term trend here is one of increased densification in town centres where public transport is effective, although LBHs focus on the potential between Heathrow Airport and Feltham runs slightly contrary to this (in that it sees southern access to Heathrow as a catalyst to development in an area currently poorly served by public transport).
- 2.6 In effect, growth is likely to be a combination of scenarios 2-5, capitalising on town centres and existing public transport networks, but bringing intensified development to areas where

¹ The London Plan 2011 set an annual housing target for Hounslow of 470 dwellings per year.

public transport can be improved. We would be looking to the London Plan review to take a strategic approach to London as a whole to ensure that, for example, the economic performance of central London is not constrained by competition in central London areas. For Hounslow, meaningful growth is only possible if public transport – particularly north south and non-radial routes – and other infrastructure sees significant investment alongside housing investment.

3.0 The green belt

- 3.1 The Options for Growth background paper discusses five options for accommodating growth, but doesn't include a review of the green belt in order to accommodate growth. It is acknowledged that the green belt is an emotive and political issue, but it seems wrong not to address this possibility more specifically in the name of debate.
- 3.2 There are five purposes of green belt defined in the National Planning Policy Framework (NPPF). These have been relatively consistent through the history of the green belt. They are:
- to check the unrestricted sprawl of large built up areas;
 - to prevent neighbouring towns merging into each other;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns;
 - to assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 3.3 Areas of green belt do not need to meet all five purposes²; meeting one is sufficient to justify it as green belt but, importantly, none of the five relate to the environmental quality of the land it protects.
- 3.4 The FALP sets the context for development in London, and it is adamant that the green belt will not be encroached upon in meeting the needs of London:
"Growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without encroaching on the Green Belt" (policy 1.1);
"The Mayor strongly supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development...The strongest protection should be given to London's Green Belt, in accordance with national guidance." (policy 7.16).
- 3.5 LBH first designated green belt in 1956, and this has been periodically reviewed during the last 60 years, with the last full review taking place in 1996. Whilst the adopted local plan maintains these boundaries in accord with the FALP, policy SV2 contains a commitment to, *"implement the findings of the Comprehensive Green Belt Review"*. This came about through the plan preparation; the green belt boundaries were unchanged in the previous UDP (2003) and no changes were proposed during the preparation of the current plan, though the West of the Borough Plan was established as a vehicle for achieving a review.

² Purpose 4 is irrelevant for the Hounslow context. In the London context, purpose 5 is often disregarded. It applies to all green belt equally, but where pressure for development exceeds the land available, the nature of the green belt comes under scrutiny. Green belt reviews seek to assess the relative importance of the green belt in a location, but purpose 5 does not assist in this process.

- 3.6 The West of the Borough Plan is a legitimate place to review the green belt. The NPPF states that, '*green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan*'. In meeting its obligation to, 'augment [local plan targets] with extra housing capacity to close the gap between identified housing need and supply,' policy SV2 commits to facilitating additional residential and employment growth partly by **implementing** the findings of a comprehensive green belt review (the wording assumes that a review will take place). Policy SV2 is clear – one means of accommodating additional housing is through a thorough examination of our green belt.
- 3.7 Clearly the extent to which the green belt will be redefined will be subject to the consultation undertaken in the process of making the plan, but LBH consider that there is a need to examine the existing boundaries, look at how current green belt land performs and see what possibilities changing the extent of the green belt might bring. This is also not simply a case of meeting the numbers; if we are to meet the needs of a wide range of people within the borough and maintain jobs and a quality of life, limiting ourselves to existing land within the green belt boundaries could lead to increasingly dense and inappropriate housing and a diminishing quality of life within those places. It is a suitable alternative.
- 3.8 It could be argued that relative to other boroughs and places, green belt in Hounslow can perform weakly against the five principles. Within a review context, this should be critically examined. However, this is also not simply a Hounslow matter. The green belt in this borough crosses into Hillingdon, Spelthorne and Richmond. Our approach needs to be consistent with the approach of our neighbouring authorities. Likewise, the type of green belt we currently protect may well be replicated in similar outer London authorities such as Enfield and Bromley. They too need to be consistent in dealing with the green belt.
- 3.9 LBH considers that a London-wide green belt review should be a factor in assessing London's development options going forward to 2050. In our case, review has been actively promoted as part of an early review of local planning policy, and we see parallels elsewhere. The adoption of our Local Plan is possible because LBH have committed to finding additional housing beyond our housing targets partly through critically examining the performance of our green belt.
- 3.10 We recommend this approach in other outer London boroughs to ensure a holistic and consistent approach and a healthy debate.
- 3.11 At the current time, LBH is not looking to areas outside of Greater London to accommodate its own need. The current model relies on the opportunities within Brentford, Hounslow and Feltham in particular (the former as part of the Great West Corridor Plan, the latter as part of the West of the Borough Plan and as part of the efforts to complement growth at Heathrow), and on the green belt review.
- Metropolitan Open Land (MOL)*
- 3.12 Hounslow also has large areas of metropolitan open land within its boundary. This carries a similar level of protection to green belt without having specific reference in the NPPF. Hounslow has a particular issue presently (and particularly in the east of the borough) with accommodating new schools. Because of the lack of available buildings and brownfield land in places where demand is greatest, parts of the MOL are coming under pressure to accommodate schools. This is presenting a challenging situation.

- 3.13 This matter is related to any approach to the green belt because the two designations have similar protection and are treated together in the London Plan (2015). Any approach in the review of the London Plan which maintains the current boundaries of the green belt will, in Hounslow's case, put a greater strain on the borough's MOL to accommodate both development and open recreational land. It is also likely to increase the pressure to intensify development in town centres and in accessible locations and may deliver housing that, because of the intensification, fails to meet all the needs of the borough. A strategy that does not look at green belt boundaries is unbalanced and potentially damaging to the whole.

4.0 Heathrow

- 4.1 Heathrow Airport is a major development in London. It is the UK's only hub airport and it is the focus for domestic and international air travel to and from this country.

Strategic working

- 4.2 Heathrow Airport is not in the borough of Hounslow, and we cannot plan beyond our boundaries (though we will seek to influence sub-regional working). A growth corridor in relation to Heathrow and adjacent boroughs should be proposed and formalised (perhaps based on the concept of the 'western wedge'). Hounslow is already taking an active lead in sub-regional matters with neighbouring authorities, particularly on the eastern side of the airport and its hinterland.

- 4.3 It is clear that the close proximity of the airport has significant benefits and significant costs for the borough. These do not demonstrate themselves equally, and they never will. However, the council must plan to ensure that we can maximize the opportunities for our residents and seek to minimize the problems. This requires co-operation and co-ordination from our outer London neighbours, and from the corridor of authorities running towards central London. Working with private sector interests, not least the airport itself, would clearly have advantages.

The importance of Heathrow to London – and Hounslow

- 4.4 The economic importance of Heathrow is clear. It is estimated that Heathrow related employment is likely to account for between 19-29% of employment for Hounslow residents. It is also suggested that 10-15% of the borough's businesses are dependent on Heathrow. Around 11,000 Hounslow residents are directly employed by Heathrow, and they account for 14.6% of all Heathrow employees and 7.2% of all Hounslow workforce. There are many businesses outside of the airport itself that are located in Hounslow on account of the access it gives them to the airport.
- 4.5 On the down side, the most obvious blight on the borough is from aircraft noise and intrusion. The flight paths into the airport over the city affect many residents, and those closest to the airport have low flying planes regularly passing overhead for 8 hour periods. Further, the noise and pollution created by those seeking access to the airport by road is as intrusive. Whilst this affects the living standards of many residents, getting respite from the noise and intrusion in our open spaces and natural environments can also be difficult because they too are blighted.
- 4.6 Heathrow Airport skews the borough's economy to some extent. Because of the clear link between the west of the borough and employment at Heathrow, there is a particular issue with housing in the west. People working at the airport also need to get to their work, and commuters compete with the traffic going to and from Heathrow for their own travel needs

(outer London commuters tend to travel into London less than those living in inner London, and because of Heathrow, employment in Hounslow is relatively localised and travel patterns are less radial). Because of the attraction of work in the west of the borough, our town centres – particularly Feltham and Hounslow – need to be strong and supportive of our residents and offer a good quality of life.

- 4.7 LBH is supportive of focusing efforts towards our town centres to support growth at the airport. As mentioned, Hounslow is designated a Housing Zone and we will continue to work with the Mayor to ensure that sites in Hounslow town centre in particular are delivered that augment housing supply. We have also developed a masterplan for Feltham which will see further housing and commercial activity directed towards the town centre with consequent benefits for residents.

Heathrow as a lynchpin for regeneration in western Hounslow – and wider

- 4.8 The council has also sought to examine potential for further growth to support Heathrow's growth on land around both Feltham and the airport, which has involved critically examining land uses and designations in this area to see how we can be supportive of the airport and of our residents and businesses. This has led us to think about bold and innovative solutions within on the western side of Feltham which may be able to:

- support commercial and industrial growth and capacity at Heathrow on the edge of the airport;
- deliver further housing along the principles of a 'garden city' to support regeneration in Feltham;
- create new and usable open spaces for new residents and businesses;
- develop a new southern rail access to Heathrow which would have a number of benefits both for local people and for those arriving at and departing from the airport
- protect the green belt between Hounslow and Spelthorne.

- 4.9 In terms of meeting London's housing needs, LBH experience is perhaps unique. However, our approach supports the idea of intensifying uses in our town centres to support other functions of the town centres and to reduce the need to travel (particularly by car). Whilst outer London does have problems with transportation – particularly when travel is not in and out of central London – but again Hounslow's western area suffers because of the addition of traffic coming and going from the airport.

- 4.10 LBH considers that its thinking supports the need to find ways to provide space for further housing, supports and provides opportunities for business, supports the growth of Heathrow, promotes placemaking within our towns and settlements and addresses some of the shortcomings in infrastructure that our borough suffers in the western parts.

- 4.11 LBH acknowledges that it cannot deliver this without the support of neighbouring authorities around Heathrow and along the corridor into central London. LBH anticipates proactively contributing to and influencing the work on the Heathrow Opportunity Area and would welcome further joint working on the 'western wedge'.

5.0 Strategic Employment

- 5.1 Like many London boroughs, Hounslow has a strategically important location for industry. The 'Golden Mile' in Brentford / Chiswick was established in the first half of the 20th Century as air travel flourished and companies fought for space along the main route into London.

The location remains a strategically important site within London and especially for media industries.

- 5.2 The location in east Hounslow provides a key cluster within this industry, generating competition, ideas and innovation. It also provides jobs within and outside of the Borough. The adopted Borough Local Plan commits to an early review focussed on the Golden Mile and the Great West Corridor generally.
- 5.3 LBH have raised the prospect of this area of the Borough could also be considered as an Opportunity Area.
- 5.4 The review of the plan will seek the support and co-operation of neighbouring and strategic bodies with an interest in the area, and will cover the major issues affecting it. These include the definition of a strategic vision based on the principal aim of retaining and promoting employment growth within the area, but also accommodating housing growth that will support the town centre at Brentford and also the improvement of important strategic transport links to help promote the vision, notably the link to Southall which would allow access to the Great West Railway and Crossrail. It can be said that growth may be predicated by transport infrastructure, but it is also the case that transport infrastructure follows growth. In the case of strategic investment in places such as the Golden Mile, that growth and transport investment must be brought forward in tandem.
- 5.5 As with the West of the Borough and its relationship with Heathrow, the early review requires wide co-ordination and support through the review of the London Plan if the housing and employment needs of the west of the city are going to be met.

6.0 Local employment

- 6.1 As discussed already, alongside the need to be delivering housing for the city is the requirement to be delivering jobs. The strategic locations for employment and the town centres are going to be fundamental in ensuring that these can be sustained and created, and there is a consequent rippling of advantages to other areas by focusing on these places.
- 6.2 However, London – and Hounslow – is abundant with local trading and industrial estates, many of which house the small and medium businesses that are also essential to the successful city economy. The OLC debates raised some of the problems that these places suffer from, and these problems are common to Hounslow. The London Plan will inevitably focus on the significant elements of London's growth, but the next level of detail down cannot afford to be ignored where guidance and support would help.
- 6.3 In the case of these small trading estates, many will be occupied by local businesses with a small catchment, employing local people. Such estates may be distant from town centres and strategic employment areas. One of the principal issues with these places seems to be communication. It would be easy to predicate London's growth on the assumption that people generally commute to the city, but in outer London this is not the case. Focusing on radial routes overlooks the complex nature of movement in outer boroughs. Because of a lack of options many of these trading and industrial estates remain dependent on car travel (reflected in low PTAL ratings); where public transport is provided it may be sporadic, infrequent or running effectively in peak hours. This may well disadvantage some of the less well paid but nonetheless essential workers who are employed in such places, or businesses

that have a 24/7 operation. Other jobs may also rely on local transport infrastructure rather than movement to and from central London – the care industry for instance. Investment in the bus network may become increasingly important for some sectors and areas.

- 6.4 Within Hounslow, this is complicated further by the airport, it being a significant node for travel but neither a town centre nor a coherent strategic employment area. Trying to appreciate the difference in work and travel patterns between inner and outer London on these trading places may be a significant benefit for the efficiency of these places if the London Plan can consider it.

7.0 Regional Co-ordination

- 7.1 As discussed earlier, it is not expected that Hounslow will need to discuss the possibility of defaulting some of its housing need to boroughs outside of Greater London. LBH is looking at all of its options and opportunities to try to balance the needs of the borough within the administrative area in co-ordination with neighbouring authorities.
- 7.2 However, LBH is aware that the pressure to deliver housing in particular, and the lack of available land (often combined with the strict approach to the retention of the green belt) is putting pressure on authorities outside of Greater London to meet some of London's need. Often these authorities are heavily constrained by the metropolitan green belt themselves and struggle to meet their own objectively assessed needs. This is particularly the case where authorities are also tightly bound by their administrative borders.
- 7.3 LBH does feel that the outer boroughs of Greater London should be engaging more productively with the neighbouring south-eastern boroughs to achieve the most beneficial and sustainable growth patterns which serve the city and allow the south east to prosper. Some strategic co-ordination seems necessary; option 5 of the Options for Growth background paper does appear to select the M1/A1/M11 corridor without explanation. The Mayor and the boroughs need to ensure that the duty-to-cooperate within and beyond Greater London is fully engaged.

11th September 2015.