

Heathrow

CONFIDENTIAL – DRAFT

Summary of Land Use Strategy Principles

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Land use strategy principles are described in sections 4 and 5 of the June 2019 Preferred Masterplan document. This note explains them further.

1 Overall Approach

The Airport has sought to intensify the use of the existing airport and land surrounding it. The amount of land required for expansion has been minimised as far as is practicable and directed to the most appropriate locations. This includes concentrating development in the two central terminal areas close to additional passenger facilities and enhanced public transport provision.

This approach is consistent with the Airport National Policy Statement (ANPS) which sets out challenging public transport targets and precludes the loss of Green Belt (which surrounds much of Heathrow) except where Very Special Circumstances (VSC) can be clearly demonstrated. Whilst the ANPS underpins the overall VSC case by establishing the national imperative for the connectivity and economic benefits of expansion, site specific justification has been critically important for development within the Green Belt and is outlined at a high level below.

The following key principles have been applied as part of the strategy:

Principle 1 Prioritising operational facilities

The ANPS includes specific requirements to provide capacity for at least an additional 260,000 Air Transport Movements and deliver runway of at least 3,500m in length (paragraph 4.3). Infrastructure and passenger facilities have been sized and laid out to meet these requirements. Airport Supporting Facilities (ASF) have been located adjacent to this infrastructure and passenger facilities to ensure the safe and efficient operation of the expanded airport. This include providing space of ongoing asset management and maintenance at the airport which is essential to its ongoing operation.

Principle 2 - Intensification of land as much as appropriate

In order to minimise land take there has been an intensification of development taking into account context and constraints, including the Obstacle Limitation Surface on airport and visual and other considerations off airport. A 2017 survey identified a total land take of circa 293 hectares for existing airport operations, cargo, maintenance and industrial. The Preferred Masterplan (paragraph 4.9.12) states that by 2035 the land take would be circa

386 hectare and additional landtake beyond 2035 can be met by intensifying the use of existing sites.

EXPLAIN WHAT HAS BEEN ACHIEVED WITHIN AND OUTSIDE THE AIRPORT IN TERMS OF DENSIFICATION; USE DVM SLIDES DEMONSTRATING DENSITY AND STACKING PRINCIPLES FOR ARD ETC

Principle 3: Work from the centre out

As the diagram below shows, the approach has been to work from the 'inside out' occupying or densifying underutilised sites and land within the existing airport and those within Heathrow's ownership first particularly where these are outside of the Green Belt where a VSC case must be demonstrated and outside of Annex A of the ANPS where stronger justification is needed.

[INSERT DIAGRAM WITH THREE AREAS – CORE, EDGE AND PERIPHERY?]

Principle 4 Providing only what is essential to support the operation of the Airport

The masterplan only includes replacement and additional Airport Supporting Development (ASD) that is essential for the successful operation of the airport, with regard to site suitability, locational & surface access imperatives, planning considerations and other factors. Joint working with the Heathrow Strategic Planning Group (HSPG) Local Authorities has also informed what needs to be brought forward as part of Expansion or encouraged separately through future local planning policy.

The table in *Appendix 1* sets out the proposed quantum of the component land uses relative to the growth in air transport and passenger numbers and explains any differences between pro-rata growth.

Commented [SB1]: TBC

Principle 5- Locate high occupancy facilities adjacent to public transport facilities

All additional passenger facilities will be focussed on the enhanced transport spine with x% of the additional new built capacity to be accommodated in in the WTZ and x% in the CTA, where public transport services are planned to grow.

Priority has been given to directing hotels and offices to sites next to public transport. The masterplan has located any new or replacement offices and hotels as a first priority to within the terminal zones, then at Hatton Cross and, as a third preference, on the northern perimeter (outside of the Green Belt) which can be served by a transit stop between the Northern Parkway and the CTA.

INSERT ADAPTATION OF FIGURE 7.2.2 of MASTERPLAN SHOWING THE BROAD QUANTUM OF PT IMPROVEMENTS

2 The Core

The central or core area is dominated by new and existing infrastructure and passenger facilities where the following principles have been adopted.

Terminal Areas

- Maximise value of their location on public transport spine
- Consolidate passenger processing facilities
- Maximise aircraft aprons
- Optimise public transport facilities
- Limited parking and kiss and fly facilities in terminal area
- Provision of essential support and ancillary facilities
- First priority locations for hotels and other commercial facilities

Airfield

- Provision of all essential infrastructure including
 - Runways and navigational aids
 - Taxiway system
 - Remote stands
- Provision of essential supporting infrastructure and built development including
 - Aviation fuel storage
 - Ancillary facilities requiring an airside location for reasons of security or operational efficiency

Maintenance Area

- Densification of existing areas
- Provision of essential infrastructure to support expansion
- Consolidation of staff car parking and other ancillary development

Cargo

- Safeguarding and facilitating the densification of the existing Cargo Area by others

3 The Edge

The Edge includes sites around the existing perimeter roads, including Bath Road to the north, the concentration of industrial building to the south of the Cargo Area and the area around Hatton Cross. Many of these sites have already been developed for airport related development but are not always intensively used, e.g. surface level car parking which is also no longer required due to the car parking strategy (see below). Many are located outside of the Green Belt and some, such as those around Hatton Cross, have good public transport accessibility. Many also benefit from direct adjacency to the airside areas. The following principles have been adopted:

Bath Road East

- Prioritise facilities that;
 - Require convenient airside access
 - Support the operation of T5XN and the northern apron
 - Require landside access
 - Do not generate high levels of landside traffic
- Seek to group mutually compatible facilities

Bath Road Centre

- Prioritise facilities that;
 - Will benefit from being on future PTS route from Northern parkway
 - Benefit from convenient access to CTA
 - Do not require airside access
 - Require good landside access and proximity to strategic road network
- Seek to group mutually compatible facilities

Bath Road East

- Prioritise facilities that;
 - Require convenient airside access
 - Require landside access
 - Do not generate high levels of landside traffic
- Seek to group mutually compatible facilities

East & Hatton Cross

- Prioritise facilities that;
 - Benefit from proximity to London Underground
 - Require convenient airside access
 - Require landside access
 - Do not generate high levels of landside traffic
- Seek to group mutually compatible facilities

South of Cargo Area

- Prioritise facilities that;
 - Benefit from proximity to existing cargo facilities
 - Require convenient airside access
 - Require landside access
 - Do not generate high levels of landside traffic
- Seek to group mutually compatible facilities

4 The periphery

Much of this area is within the Green Belt and sites have only been included where there are no alternatives, either in locational terms such as the positioning of the Parkways (see below) or because the required quantum of development cannot be accommodated on more central sites in the Core or Edge. It includes the extension to the industrial areas in Poyle in the west (Zone L), the areas around the Railhead in the north west (Zone M) and sites in the vicinity of the motorway junctions (Zones Q & J). The following principles have been adopted:

West

- Prioritise facilities that;
 - Require good access to strategic road network
 - Are compatible/similar to existing facilities
 - Benefit from access to south side of the airport
 - Are as far as practicable sympathetic to the greenbelt

North West

- Prioritise facilities that;
 - Benefit from proximity to the railhead for bulk deliveries and as a consequence would reduce highway traffic
 - Benefit from direct airside access and as a consequence would reduce highway traffic
 - Require good landside access
- Seek to group mutually compatible facilities

Vicinity of Motorway Junctions

- Consolidated car parking
- Intercept passenger and staff vehicles as soon as they leave the strategic road network
- Reduce traffic on local road network
- Reduce bussing movements to and from parking areas

5 Very Special Circumstances on the Edge and Periphery

Because of the need for a robust VSC Green Belt case a further explanation of the rational for areas which are being developed on Green Belt is set out below.

Parkways

The Northern and Southern Parkways (both with over 22,000 spaces) along with large car parks near to Terminal 4 (circa 6,500 spaces) are shown in the Preferred Masterplan (see Figure 7.7.2).

The parkways have been located on the periphery of the expanded Airport because:

1. The decentralisation/concentration of car parking allows more higher intensity uses (i.e. passenger facilities, hotel and offices) to be located within the airport boundary including adjacent to the Central Terminal Area; and
2. They are positioned adjacent to the Strategic Road Network (SRN) and reduce car journeys in the immediate vicinity of the Airport and on local roads.

The Parkways are intended to replace numerous dispersed surface level car parks and have been sized to limit the attractiveness of car use consistent with the challenging surface access/mode share targets in the ANPS¹.

The number of spaces associated with the expanded airport (up to 67,000) remains at a similar level to the 2016 base (64,000), despite displacements and a significant increase in passenger numbers.

Consolidation of car parking spaces into Parkways helps land-take to be minimised (subject to other policy tests including the impact on the openness of the Green Belt) and means that fixed transit links can replace dispersed bus links that serve the Airport's existing, mainly surface level, car parks. The approach of consolidation and concentration is set out in more detail in Chapter 2.7 of the SDR and Chapter 3.4 of the Surface Access Proposals (both published in June 2019)

The Southern Parkway site is located within the Annex A boundary of the ANPS and therefore benefits from in principle support from the ANPS. The Northern Parkway is located outside of Annex A and it is therefore more important to justify why its inclusion in the DCO is essential.

Both sites perform reasonably well in their function as Green Belt and a robust VSC case is essential.

The Southern Parkway site was assessed as part of Wood's Green Belt Assessment and is identified as making a 'Contribution' to Green Belt purposes. Wood's assessment states that *"The parcel serves to prevent sprawl and merger whilst maintaining openness at a local scale, reflecting the complexity of land use within the parcel and its relationship with the large built-up areas of Heathrow Airport to the north and Stanwell to the southeast."* The site of the Northern Parkway was assessed as part of a wider land parcel in Wood's Green Belt Assessment, which is identified as making a 'Contribution' to Green Belt purposes. Wood's assessment states that *"The Green Belt (in combination with land to the south) contributes to preventing localised sprawl, contributes to maintaining the separation between Harlington and Sipson, the openness of land between these two settlements and contributes to the setting of Harlington Conservation Area. Retention of the Green Belt to the west of Harlington would protect the immediate setting of the Conservation Area and a modest degree of separation between Harlington and Sipson."*

FURTHER JUSTIFICATION NEEDED FOR T4 AND VALET PARKING

¹ Including the need for Heathrow to increase the passenger public transport mode share to at least 50% by 2035 and at least 55% by 2040 (ANPS, paragraphs 3.51 and 5.17); The need for a reduction in all colleague car trips of 25% by 2030 and 50% by 2040, compared to a 2013 baseline (ANPS, paragraph 5.17); and That Heathrow should continue to strive to meet its public pledge to have landside airport related traffic no greater than today (ANPS, paragraph 5.38) and deliver the proposed expansion without affecting the UK's ability to comply with legal obligations on air quality.

Commented [PM2]: A key point we have been pressing, but do we have sufficient evidence on the need for the number of spaces proposed? For example why cant we cope with say 5k less?

Commented [PM3]: Impact of the northern park on openness of the adjacent GB is still to be fully presented by Grimshaw and tested. We have repeatedly raised concerns about the scale of the parkway.

Freight Forwarding

New freight forwarding facilities have been provided to meet demand as the airport expands. These new facilities are located south of the airport, close to existing industrial and cargo areas and close to major highway access routes. The Preferred Masterplan document (Figure 7.6.1) shows freight forwarding concentrated in two principal locations outside of the Airport:

1. To the south of the expanded airport on 4 sites (c.65,000 sq.m) situated in the Green Belt in Zone H
2. To the west of industrial areas in Poyle in Zone L (c.59,000 sq.m), again in Green Belt.

In addition, a site is identified in Zone K (c.13,500sqm) to the west of the Airport (south of Zone L) and within Zone G (c.11,500sqm) to the south east of the Airport. The former of these two sites is no longer proposed as the site is required for construction purposes for a significant period.

The quantum of development seeks to mitigate the loss of some of the existing warehousing provision which supports Heathrow today where it would pass Associated Development tests (c.63,000sqm), as well as meet some of the forecast demand generated as a result of Airport expansion.

Commented [SB4]: The forecasts are being updated

All sites are located in the Green Belt. The essence of the VSC case is set out below.

Heathrow displaces a substantial amount of Freight Forwarding floorspace, a large proportion of which has a strong association with supporting on-Airport cargo activity. It is therefore important that Airport expansion plan to reprovide this space to avoid a detrimental impact on cargo operations today.

Furthermore, expansion will result in the increase of cargo capacity at the Airport which delivers significant economic benefits – this was one of the key factors behind the Government's selection of Heathrow. The Employment Land Forecasting Study produced by Lichfields evidences that the increased cargo capacity at the Airport as a result of expansion will generate a need for a new Freight Forwarding floorspace. Consistent with the NPPF, Heathrow consider that the Local Plan process is the most appropriate forum to plan for this forecast growth, and Heathrow is supporting HSPG's Joint Strategic Planning Framework. The approach is strongly supported by Slough Borough Council whose AEC consultation response states that the expansion of Poyle Trading Estate is the most sustainable option for replacing lost facilities and creating the additional floor space that is needed to support the expansion of the airport.

The sites need to be included in Heathrow's DCO proposals because the Local Plan process will take time to materialise. Evidence suggests, based on previous Local Plan timings, that a coordinated approach via HSPG may result in Local Plans being produced from c2026/2027. Prior to this point, Heathrow has no certainty that the market would be able to reprovide the lost floorspace and initial forecasted demand at the right time and in the appropriate location. Development outside the DCO is likely to lead to piecemeal uncoordinated development resulting in the inefficient use of land and a less sustainable approach to development – for instance the uncoordinated approach may result in additional transport movements in more sensitive locations, reduced management of air quality impacts, etc.

The proposed sites for freight forwarding sit to the south and west of the airport, within an area already dominated by industrial development. Today existing cargo functions are focused to the south of the airport i.e. around Dnata, Poyle, and Hatton, which responds to the location of ITSF/transit shed operator on-airport. Following expansion these on-airport facilities will continue to be located to the south of the airport (including the intensification of the Horseshoe), and therefore there is a logic in accommodating new demand on sites in close proximity to these transshipment facilities, where sites are available to the south and west of the airport. This enables a consolidation of cargo activity, especially on the sites south of the Airport, to create a cargo village which can only realistically be achieved through coordination in the DCO.

The sites have been identified in accordance with the Land Use Decision Tree and score highly against the defined locational criteria, particularly for those sites to the south:

1. Within/on customs boundary, or within 1 mile of the cargo entrance to the airport;
2. Good highway access to trunk roads;
3. Swift, unimpeded access to the ITSF, with low risk of delay;
4. Potential to consolidate alongside the existing cargo hub toward the south of the airport;
5. The Surface Access team and HAL cargo operations have suggested a preference towards sites to the south in an arch between Poyle Industrial Estate and North Feltham Trading Estates, which can be intersected south off the M25 which will allow for more operational efficiencies with the existing southern cargo area; and
6. Avoid sites to the north and north east of the airport as more sensitive for trip generating uses.

The sites are generally poorly performing Green Belt sites, and their redevelopment has limited impact on the local or strategic function of the Green Belt. This is explained further in **Appendix 2**.

North West Zone

Zone M on the south western side of the expansion area includes up to 86,500 sq.m of Airport Supporting Development (ASD) to the south and east of the proposed expanded rail head. ASD is proposed in this location to take advantage of the strategic location close to the railway line. This area also has the advantage of being directly adjacent to the new runway and can therefore have direct access to Airside.

Consolidating logistics functions in this zone therefore minimise traffic generation on the local roads and supports overall sustainability.

Commented [PM5]: These elements are ASF items and Atkins will need to assist amplify on the locational rationale.

Immigration Removal Centre (IRC)

It is proposed to relocate the existing two IRCs into a single consolidated facility to the south east of the expanded Airport in Zone G close to Hatton Cross on Airport Business Park. The proposed replacement is in accordance with Paragraph 5.128 & 9 of the ANPS, which requires facilities to be replaced without any gap in provision in order to maintain effective immigration control.

The site selection has been informed by Home Office requirements, whose specification requires a combined replacement facility and a site area at least the same as the existing crown land.

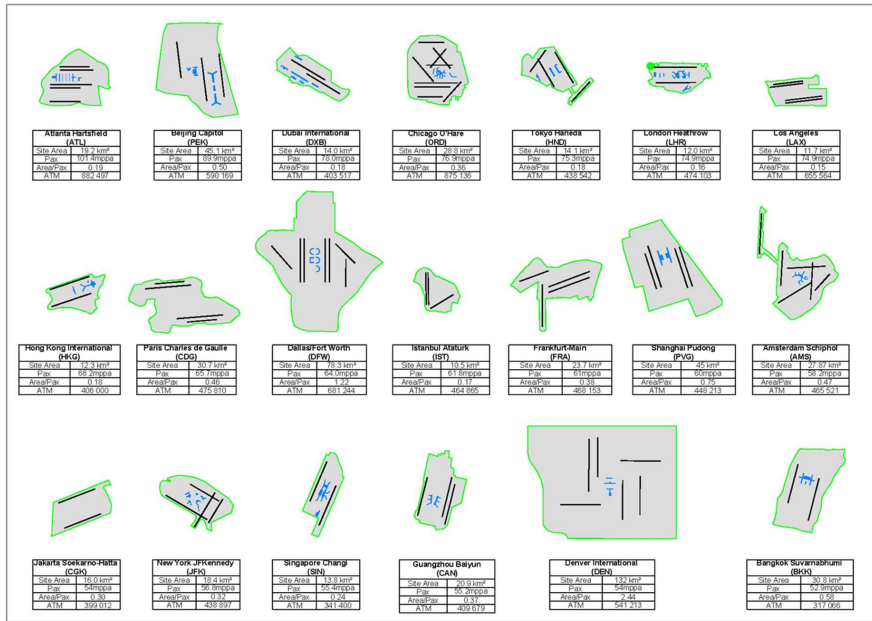
Following a thorough site selection process, the Airport Business Park was shortlisted as the preferred option in order to meet the Home Office's locational requirements. This follows engagement with LB Hounslow who support the Airport Business Park site as the preferred location, rather than Mayfield Farm which was previously identified by the Home Office.

The site is designated Green Belt land and was assessed as part of Wood's Green Belt Assessment as making an 'Contribution' to Green Belt purposes. Wood's assessment states *"The principal role of the Green Belt is its contribution to the continued separation between Bedfont/Feltham and Hounslow, containment of localised sprawl and maintaining openness in a built-up area through the provision of a number of recreational land uses within the Green Belt parcel, such as sports pitches, allotments and an urban farm."*

APPENDIX 1

Intensification of Heathrow existing airport

Heathrow already intensively uses its land holding as illustrated in below analysis which compared land use and passenger throughput across global airports.



Examples of the intensification include for example T5A which has multiple levels – with a large number below ground. Over the last 15 years new developments such as T2 and T5 have been developed in a toast rack fashion to maximise the usable space between the runways.

The existing estate can be broadly grouped into 4 land uses

- Terminals and airfield
- MRO
- Car parking
- Cargo

The following notes outline the key actions being taken to intensify the use of the facilities.

A. Terminals and airfield

Further intensification is being delivered by increasing the throughput through T4 and T5, with minor physical modification, process change and use of an airline occupancy strategy.

Terminal	Annual Throughput (mppa)	
	2018	2050
T4	9.4	12.5
T5	32.8	40

There is a major extension of T2 proposed, which also involves the demolition of both T1 and T3, and a maintenance hangar.

Terminal	Annual Throughput (mppa)	
	2018	2050
T2	18.5	52.5
T3	19.5	-
Eastern Campus total	38	52.5

The changes to Terminals 1 through 5 highlights that all operational areas of the airport are being intensified to minimise the need for additional land.

B. MRO

As mentioned above the maintenance area is reduced in size as the airfield encroaches, to allow the construction of T2C. The replacement of the Cathedral Hangar will be accommodated in the existing Maintenance base site by reconfiguring the site. As part of this reconfiguration there is a spatial provision for a further 3 hangars. This allows the increasing MRO provision to be accommodated within the existing site provision – as the number of ATMs per year grows from 480,000 to over 740,000. There is no requirement for additional land.

C. Car Parking

The existing car parking is one area where Heathrow is not overly efficient with a majority of spaces being at surface level. These spaces disappear as part of the development of the airport as they are reprovided in decked parking.

D. Cargo

The existing cargo activities are located to the south of the airport. We are proposing to double our existing cargo throughput through both process and infrastructure change. The development of the cargo 'horseshoe' is being planned by the landowner Segro. This will see the 1960s designed area replaced by a modern cargo city. Process changes will include new and improved ways of working, increased productivity and the use of technology that is revolutionising the wider warehousing sector.

Appendix 2 Green Belt Assessment of ASD Sites

Zone H01

- The sites are all situated within the administrative boundary of Spelthorne BC and are located within the Green Belt. The Wood Green Belt Assessment identifies the sites as part of a wider land parcel that makes a 'Limited Contribution' to Green Belt purposes. The concluding commentary for the land parcel states *"the parcel provides a Limited Contribution to the Green Belt due to its small area, and surrounding built form and separation from the wider Green Belt to the south and east."*
- The Wood assessment also considers each site individually and concludes that each also makes a 'Limited Contribution' to the Green Belt.
- In light of the above, it is concluded that the sites, both individually and collectively, fulfil a limited Green Belt role and function, and therefore their redevelopment would result in limited Green Belt harm. This is reflected in the Spelthorne's Green Belt evidence base produced by Arup (2018) which concludes that the site fulfils a 'Weak' Green Belt function.
- Spelthorne's Con 1 response commented upon the sites to the west and south. In respect of land to the west it is stated that *"development for airport related commercial uses would not undermine the wider strategic function of the Green Belt nearby and could provide the opportunity for some extensive environmental enhancement for the benefit of the local community, as well as further employment opportunities"* (para 11.1). In terms of land to the south, it is stated that *"the site has potential for residential or commercial development but also provides an opportunity for landscape enhancement to provide a more effective buffer between the existing commercial and residential development. If industrial uses are proposed there is likely to be additional impacts from noise and light on nearby residential property"* (para 12.1). In relation to land to the east, this was not identified as part of the Con 1 material, but was specifically raised in Spelthorne's Con 1 responses as land that could be considered along adjacent parcels (para 17.4).
- Overall, the sites in Zone H01 fulfil a limited Green Belt function and therefore the extent of harm is considered to be low, which is outweighed by the factors outlined above. Spelthorne's Con 1 response does not object to the redevelopment of the sites, subject to site specific factors being addressed ie access, buffer treatment, etc

Zone H02

- The site is within the administrative boundary of Spelthorne BC and is located within the Green Belt. The Wood Green Belt Assessment identifies the site as forming part of a wider land parcel that makes a 'Significant Contribution' to Green Belt purposes. The concluding commentary for the land parcel states *"although the parcel lacks a coherent character, and is fragmented by development throughout, it does contain agricultural fields and mature trees and hedgerows which maintains physical and visual openness in contrast to the surrounding"*

urban and industrial development and serves to separate the communities of Stanwell and East Bedfont, and contributes to containing further sprawl along the A30. The parcel exhibits a broad east-west split, with the western side [which contains the proposed site] being more urbanised and fragmented in character which makes less of a contribution to Green Belt purposes.” Consistent with the Wood Assessment the Spelthorne’s Green Belt evidence base produced by Arup (2018) concludes that the wider land parcel fulfils a ‘Strong’ Green Belt function. The evidence base does not review the site in isolation.

- The Wood assessment also considers the site individually and concludes that it makes a ‘Limited Contribution’ to the Green Belt.
- Spelthorne’s Con 1 response commented upon the site as follows “*the potential use for cargo facilities is clearly the most practical form of airport related development, given the proximity to existing cargo premises such as dnata. We recognise that increasing cargo floorspace, to cement this location as a hub, makes ultimate sense for Heathrow and would bring economic benefits in terms of employment. We do not consider the site suitable for other uses*” (para 6.5).
- Overall, the site fulfils a limited Green Belt function and therefore the extent of harm is considered to be low, which is outweighed by the factors outlined above. Spelthorne’s Con 1 response supports redevelopment for cargo related uses, subject to site specific factors being addressed ie remediation of historic landfill, access, buffer treatment, etc

Zone L01

- The site is within the administrative boundary of Slough BC and is located within the Green Belt, Strategic Gap and Colne Valley Park. The site also contains a Grade II listed building.
- The Wood Green Belt Assessment identifies the site as forming part of a wider land parcel that makes a ‘Significant Contribution’ to Green Belt purposes. The concluding commentary for the land parcel states “*the parcel has a reasonably open countryside character and the Green Belt strategically contributes to maintaining the openness of the land to the west of the M25, in combination with land to all directions (being part of the Colnbrook Valley), locally contributing to maintaining the separation between Colnbrook, Horton and Poyle.*”
- The Wood assessment also considers the site individually and concludes that it makes a ‘Contribution’ to the Green Belt, commenting that “*the site itself has been degraded by industrial use, but due to effective screening of this activity from views available along Poyle Road, the overall impression of the site is of a rural landscape at the fringes of urban and industrial areas. The site serves to limit the westward expansion of intensive industrial activity to the east of Poyle Road*”.
- The northern portion of the site is currently utilised for industrial and mineral related activities, beyond which is the Hilton hotel to the north, and the western edge of the site contain some all scale industrial/storage related uses. Part of the site therefore already exhibits the characteristics of an industrial site;

- In light of the previous uses on the site and subject delivery of environmental enhancements delivered elsewhere, redevelopment would not have a detrimental impact on the Colne Valley Regional Park;
- Overall, the site does fulfil a Green Belt function and the proposed development will cause harm however, this is outweighed by the factors outlined above. Slough BC support the release of the site for warehouse uses as set out in emerging local plan documentation.

Zone G03:

- The site is situated within the administrative boundary of LB Hounslow and is located within the Green Belt.
- The Wood Green Belt Assessment identifies the site as forming part of a wider land parcel that makes a 'Significant Contribution' to Green Belt purposes. The concluding commentary for the land parcel states *"the Green Belt acts to prevent the localised sprawl of development and in combination with other Green Belt to the east helps to ensure the separation of Feltham and Hounslow, whilst maintaining a degree of openness in an otherwise densely developed locality."*
- The Wood assessment also considers the site individually and concludes that it makes a 'Limited Contribution' to the Green Belt, commenting that *"whilst there is a degree of openness retained in the site, this is highly localised which, along with the removal of any strategic role through severance from the wider Green Belt, means the site makes an overall Limited Contribution to the Green Belt"*.
- The south eastern portion of the site contains a surface level car parking. The western and north eastern side of the site comprises an area of open land, which is fenced preventing public access. The site is bound to the east and west by existing industrial/warehouse premises which provide a commercial context to the site, that is reinforced by the Staines Road to the south which is well trafficked with commercial vehicles serving the adjacent industrial estates;
- This is reflected in the emerging Hounslow West of the Borough Local Plan which proposes to re-designate the site for industrial purposes;
- Overall, the site fulfils a limited Green Belt function and therefore the extent of harm is considered to be low, which is outweighed by the factors outlined above