

Background to the development:

Heathrow Airport Limited (HAL) have been consulting with Hounslow Council to find a replacement site for the current Heathrow immigration detention centres, which are due to be demolished to build the third runway. The preferred location is a site to the east of Bedfont Allotments and playing fields, between Faggs Road, Hatton Road, and Staines Road. The land is currently part of the Green Belt, and it is used by locals as a public open green space and is an important site for nature. Green Belt land should only be developed in “*exceptional circumstances*”.

Hounslow Council’s new Local Plan proposes to lift this site’s protected status and develop it as a “*major new logistics and industrial business park*”. In the Local Plan, this site is known as ‘**Airport Business Park (Site ID - 0/1a/1b/2)**’. It is intended to capitalise on the economic potential of the Heathrow expansion, which is considered sufficient justification for the removal of Green Belt status and the overriding of other community uses. However, the plan makes no mention of Heathrow Airport’s well-known intention to build a new detention centre on the site. It appears that opening this land up for development would open the door for HAL to purchase it, thus paving the way for a new detention centre, and removing another obstacle to the building of the third runway at Heathrow.

HAL have identified a back-up site at a location called Mayfield Farm. This is also a piece of Green Belt land, and its development is also included in the Local Plan, under the site name ‘**Heathrow Gateway (Site ID - 0/1a/1b)**’.

The Local Plan is up for consultation now. Below is some guidance on how to voice your opposition to the development of either or both sites. You may use as many or few of our recommended arguments as you would like, such as:

- Loss of important local green space used for recreational and leisure purposes and which helps mitigate air pollution
- Unjustified removal of site from Green Belt status which will lead to “*inappropriate development*” as defined by Green Belt legislation and National Policy
- The need for industrial employment floorspace outlined in the Employment Review is speculative and based on unknown forecasts

Summary of some points that may be made about the proposed Airport Business Park and Heathrow Gateway sites:

- **Misleading consultation:** The consultation document says the site for a proposed Airport Business Park should be taken out of the Green Belt in order to provide industrial floorspace near Heathrow. But the Council is engaged in discussions with Heathrow Airport Ltd for the same site to be used for a different purpose, namely an immigration detention centre. The London Plan 2016 states that ‘boroughs should be clear about their expectations for the neighbourhood’ (p. 284). This consultation is misleading about possible future use of the Airport Business Park and/or Heathrow Gateway site.
- **Green Belt:** The Local Green Belt Reviews (2017, 2019) assess the Heathrow Gateway site as performing strongly as Green Belt and that it

should not be re-designated and the Airport Business Park as performing moderately as Green Belt. National Policy does not support the lifting of these sites out of the Green Belt.

- **Safeguarding the sites:** If either site is removed from the Green Belt, it should be safeguarded to ensure that only appropriate development is built in accordance with the local need that is outlined in the local plan review.
- **Pollution:** Hounslow already has illegal levels of air pollution. Expanding Heathrow airport will worsen this even further and be in conflict with Hounslow Council's objectives "*to maintain and enhance biodiversity (areas of nature conservation and interest, wildlife and habitats*" and "*improve and protect air, land and water quality in the West of Borough.*" (West of Borough Integrated Impact Assessment Report (2019))
- **A detention centre on the site will not promote growth, community wellbeing, health, biodiversity, or any other positive outcomes for the borough.** Rather, if it were built on this land it would seriously detract from local amenities and biodiversity and undermine the Green Belt. It will not "*enable people to live healthy, active lives... maximize the opportunity for community diversity, inclusion and cohesion; [or] contribute to people's sense of place, safety and security*" (London Plan 2016).
- **Quality/quantity of work:** Immigration detention centres have a proven record of institutional abuse, high levels of drug use and self-harm among people detained. For those working there, detention centres do not "*provide a satisfying job or occupation for everyone who wants one*" (Council objectives, Theme 6). A detention centre would provide only a small contribution towards 3,800 full-time employment jobs across 145,000 square metres, particularly as such centres exploit vulnerable detainees to do essential tasks, at £1 an hour.
- **Reduced national need for detention centres:** If the 28-day time limit on detention supported by many MPs is enacted, the number of people who could legally be detained would shrink by as much as 60%. Even more reason not to build a costly replacement detention centre.

Instructions

Website address: <https://haveyoursay.hounslow.gov.uk/planning-policy/local-plan-regulation-19-consultation/consultation/intro/>

The only required entries are your name and email address. You do not have to register your address, although if you live in Hounslow, we advise that you do so. You only have to fill out the parts of the consultation that you choose to, and in each section, you can answer as many or as few questions as you choose.

The preferred and back-up sites for the relocation of the detention centres are both covered by the 'West of Borough Plan'. You can directly voice your disagreement with what has been proposed for these sites by answering questions 74 & 75, on the Heathrow Gateway, and 76 & 77, on the Airport Business Park, which are found in the section '**West of Borough: Places policy**'.

You can make these points again under the '**Site allocation**' question, and you can voice more general opposition to Hounslow Council's compliance with

immigration detention under **'Any other comments'**. Our guidance is as follows.

'West of Borough: Places policy'

Q74. P3 Heathrow Gateway

74. P3 Heathrow Gateway - Do you consider this policy to be...		
	Sound	Unsound
Positively prepared?	<input type="radio"/>	<input type="radio"/>
Justified?	<input type="radio"/>	<input checked="" type="radio"/>
Effective?	<input type="radio"/>	<input type="radio"/>
Consistent with national policy?	<input type="radio"/>	<input checked="" type="radio"/>

75. What are your reasons for this? Are there any changes you think should be made? (Please be as precise as possible with reference to paragraph and policy numbers)

- Hounslow Green Belt review (June 2019) says that this site **has a strong performance as Green Belt** (that is, in preventing urban sprawl of large built up areas and safeguarding the countryside from encroachment) and the review recommended that the site **be retained as Green Belt**. The Green Belt Review (2017) also recommended that the site be identified as safeguarded land.
- In light of this, it is **not considered that the policy is justified** - that is, it is not the most appropriate option - **nor is it in line with national policy**, which requires exceptional circumstances to develop on Green Belt land.
- It is particularly inappropriate in this case as the transport and commercial requirements cited in the plan may be seen by Hounslow Council to justify removing Green Belt status, there is no mention in the plan of the potential use of the land for the building of a new detention centre.
- A detention centre is not a necessary development for Hounslow. It will not promote growth, community wellbeing, health, biodiversity, or any other positive outcomes for the borough. Rather, if it were built on this land it would seriously detract from local amenities and biodiversity and undermine the Green Belt.

- The policy is disingenuous, as it would open the door for the development of a detention centre on this land without local consultation.
- If the site is removed from the Green Belt designation, it should be safeguarded for the development proposed in the local plan review, i.e. mixed-use residential development, office and retail space and community facilities.

Q76. [This is the **really** important one]

76. P4 Airport Business - Do you consider this policy to be...		
	Sound	Unsound
Positively prepared?	<input type="radio"/>	<input checked="" type="radio"/>
Justified?	<input type="radio"/>	<input checked="" type="radio"/>
Effective?	<input type="radio"/>	<input type="radio"/>
Consistent with national policy?	<input type="radio"/>	<input checked="" type="radio"/>

Q77. [This is the **really** important one]

- The plan is not 'positively prepared', because while it 'seeks to meet objectively assessed development and infrastructure requirements', it does not disclose that the development of the land will not necessarily result in these requirements being met, as it is likely to be purchased by Heathrow Airport Limited for the construction of a detention centre ('Immigration Removal Centre').
- The plan is not 'justified' because it is not the most appropriate strategy, given that it effectively releases a piece of Green Belt land to the development of a detention centre.
- The plan is not consistent with national policy as it does not meet any of the London Plan's requirements for legitimately lifting Green Belt status (London Plan 2016, 145 & 146), particularly if the land gets used for the building of a detention centre.
- The plan is not consistent with national policy on another count. The likelihood of a detention centre being built on this site means that it doesn't adhere to Policy 7.1 of the London Plan 2016, which states that new local developments should 'enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security'. An Immigration Removal Centre Does none of these things for the people of Hounslow, especially when it is built on land currently used for recreational purposes, that provides access to green space in a built-up area. This is doubly so given that IRCs have a publicly proven record of institutional abuse, high levels of drug use and self-harm, and

disproportionately target working class people and people of colour. Such a discriminatory and hostile institution is unlikely to cultivate the same community spirit as free public space where people can meet, exercise and socialize.

- We suggest that if any development on the site is not for industrial purposes, then that development should have to meet the Green Belt test for appropriate development.

Broader objections:

- Hounslow Council have said that they need to support the provision of a target of at least 201,000 sqm of industrial floor space within key locations such as Airport Business Park.
- The Airport Business Park would comprise of around 145,000 sqm of industrial floor space, made up of former Green Belt land re-designated as a Locally Significant Industrial Site. Hounslow Council 'considers that the acute need for land to meet the requirements for additional industrial floorspace in this area in the vicinity of Heathrow, alongside the lack of alternative locations for such land, represent exceptional circumstances for altering the Green Belt boundary in this location.' (Local Plan Review, Vol 3., p116). However, any assessment for industrial employment floorspace is speculative and based on unknown forecasts - it is not necessary to release land at this time; instead, the land could be identified as a safeguarded area to meet a longer-term industrial development need which might arise after the consultation has finished.
- If this site is removed from the Green Belt, Heathrow Airport intend to re-house Harmondsworth and Colnbrook immigration detention centre there, as one mega detention centre with a minimum capacity of 1,060 places. Hounslow Council are well aware of Heathrow Airport's intentions to do this. This is misleading and leaves the space open to a use that does not meet Hounslow's economic or social needs and objectives.
- Building a detention centre is in conflict with the council's objective (Theme 6) to "*provide a satisfying job or occupation for everyone who wants one*". Detention centres are highly distressing environments to work in, as the people who are detained suffer from disproportionately high levels of mental health conditions and are deprived of physical and mental health support, while there are frequent occurrences of self-harm and suicide (citation). One whistle-blower who worked in the Brook House detention centre described it as "chaos", saying "People abusing drugs, dealing drugs, self-harming, fighting. And the staff, they can't cope, they can't manage with what's happening in the centre."
- Hounslow council say that they expect the Airport Business Park site to provide 3,800 full-time employment jobs across 145,000 square metres. However, in detention centres, detainees carry out a large part of the running of the detention centres instead of official members of staff - work like cleaning, cooking, running recreational activities within the centre, garden maintenance, serving food, working in the shop, washing pots in the kitchen, cleaning laundry, etc. Detainees are only paid around £1 per hour to do this work. This does not contribute to Hounslow's employment targets, but only to the exploitation of detained persons.

- Furthermore, there is a strong political opposition to detention centres, and there is currently a bill going through parliament to limit the amount of time someone can be detained to 28 days. If this bill succeeds, the amount of people in detention is expected to significantly drop. In these circumstances, there is even less justification for a costly, expensive detention centre. Detention centres are often built to Category B prison standards – therefore, if it was decided that the new detention centre was not needed, there would be no realistic alternative uses for the building other than as a prison or Young Offender’s Institute (YOI). None of these 3 uses are necessary or deemed necessary in terms of Hounslow council’s priorities.
- In conclusion, the approval of this local plan would indirectly make this land available for purchase and development by Heathrow Airport Limited as a detention centre. This would be incompatible with Hounslow’s employment growth targets, and also with its present justification for lifting the Green Belt designation. Furthermore, it renders this consultation highly misleading. Hounslow Council should do everything in its power to prevent this development, by not removing the Airport Business Park site from the Green Belt designation.

To hammer these points home, you can also make them in the section on ‘Site Allocations’.

‘Any other comments’, question 82

Under ‘Any other comments’, question 82, we would invite you to take objection to the fact that the council has made no mention of the proposed detention centre, and voice your broader opposition to Hounslow Council’s compliance with the building of new detention centres, as inhumane, racist institutions. Feel free to make some of the following points:

Misleading consultation:

- The Local Plan states that Hounslow Council wants to take the Airport Business Park site (Site ID – 0/1a/1b/2) out of the Green Belt in order to develop it as a site for warehousing and logistics, in order to meet their employment requirements as laid out in the Employment Review 2016. However, Heathrow Airport Limited have already said that this site is their preferred location to re-house the Heathrow detention centres. Once this site is taken out of the Green Belt, Heathrow Airport can compulsory purchase the land and develop on it without restrictions. Likewise, when the consultation talks about the Heathrow Gateway site (Site ID - 0/1a/1b), it does not mention that removing this site from the Green Belt could mean that Heathrow Airport is able to build a detention centre on that land, instead of housing and other developments being built by Hounslow Council. **This is misleading as the public are not being informed of the full implications of removing these sites from the Green Belt, and they are therefore not able to respond to the consultation in a meaningful and informed way.** It is also in contravention of national policy, as the London Plan 2016 states that ‘boroughs should be clear about their expectations for the neighbourhood’ (p284).

Say NO to detention centres

- Detention centres are **racist** and **cruel**, and the people targeted for detention are disproportionately from working class communities and people of colour. People there are held in prison-like conditions for an indefinite amount of time, sometimes for years. They are snatched from their families, their loved ones and their communities, a tactic that hinders them from making successful asylum cases. It is well documented that many human rights abuses happen inside.
- Detention centres are also incredibly **expensive** – in the year 2017-2018 alone, the Home Office spent £108 million on running detention centres. This figure does not account for associated costs of detention, such as compensation pay-outs from unlawful detention claims or costs such as healthcare or escorting people. Therefore, the real cost of detention is likely to be significantly higher. For example, according to the Guardian, the Home Office paid out more than £21 million between 2012-2017 to people who were detained illegally.
- Furthermore, there is a strong political opposition to detention centres, and there is currently a bill going through parliament to limit the amount of time someone can be detained to 28 days. If this bill succeeds, the amount of people in detention is expected to significantly drop. In these circumstances, there is even less justification for a costly, expensive detention centre. Detention centres are often built to Category B prison standards – therefore, if it was decided that the new detention centre was not needed, there would be no realistic alternative uses for the building other than as a prison or Young Offender's Institute (YOI). None of these 3 uses are necessary or deemed necessary in terms of Hounslow council's priorities.
- Detention centres are socially divisive institutions. Predominantly working class people and people of colour are incarcerated there. As such it seems obvious that building a detention centre in Hounslow conflicts with the council's employment objective (Theme 6) to *improve opportunities for community cohesion and increase understanding and learning between communities*".
- Hounslow Council should not allow a detention centre to be built in their borough in these circumstances.

Negative impact upon health and wellbeing of residents

- Hounslow already has illegal levels of air pollution – and expanding Heathrow airport will worsen this even further. Green spaces are vital spaces as carbon sinks and to reduce an urban heating effect. This is in conflict with the following of Hounslow Council's objectives, as outlined in their West of Borough Integrated Impact Assessment Report (2019):
 - To maintain and enhance biodiversity (areas of nature conservation and interest, wildlife and habitats); and
 - Improve and protect air, land and water quality in the West of Borough.
- Hounslow council also note that in the borough *"obesity is a concern, especially for children"* and that there is *"low-level of physical activity among residents"* (p.24 Integrated Impact Assessment Report, 2017) – losing a local public green space will make it less easy for locals to access leisure and recreational facilities. Developing a detention centre is in conflict with the following of Hounslow Council's objectives, as outlined in

their West of Borough Integrated Impact Assessment Report (2019) under Theme 4:

- To maintain and improve the health of the population; and
- To ensure equality of opportunity through fair and equal access to services... [such as] leisure and recreation for all residents.