
Appeal Decision

Site visit made on 21 June 2022

by M Aqbal BA (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 18 July 2022

Appeal Ref: APP/F5540/W/21/3287699

Heathrow South Cargo Centre, Girling Way, Feltham TW14 0PH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Lee Gough, Kuehne & Nagel Limited. against the decision of London Borough of Hounslow.
 - The application Ref 01390/B/P13, dated 21 January 2021, was refused by notice dated 27 May 2021.
 - The development proposed is erection of a new parking deck structure to provide additional parking.
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Decision

1. The appeal is dismissed.

Main Issues

2. The main issues are a) Whether or not the proposal promotes and secures a sustainable local travel network that maximises opportunities for walking, cycling and using public transport, and b) the effect of the proposal on the appearance of the area.

Reasons

Sustainable travel

3. The appeal site comprises a large commercial building and associated car park, located near the junction of Girling Way and Great South-West Road (A30). The business operating from the site is a facility for the storage of urgent air cargo. This operates 24 hours, 7 days a week, across three floors and has a total gross floor area of about 12,050m².
4. An existing surface car park is located to the north-east of the building. The proposal seeks to reconfigure this to accommodate a disabled bay and a ramped access to facilitate the proposed upper deck parking area. This would increase the total car park capacity for the building to 133 spaces.
5. Based on the appellant's submissions, the additional car parking is intended to accommodate some of the excess parking demand associated with the existing business operations, and to alleviate operational issues and safety concerns associated with double parking and significant levels of on-street parking in the area. Along with meeting the future needs of the business.
6. Table 10.4 of The London Plan 2021 (LP) sets out maximum office parking standards, which also apply to Use Classes B2 (general industrial) and B8 (storage or distribution) employment uses. These stipulate a maximum of one

space per 600 square metres of floor space. The number of parking spaces for the existing building already constitutes a significant overprovision. Therefore, the proposed cumulative number of parking spaces would significantly exceed the maximum standards permitted.

7. However, paragraph 10.6.18 of the LP acknowledges that for industrial sites, the role of parking – both for workers and operational vehicles – varies considerably depending on location and the type of development proposed. Provision should therefore be determined on a case by-case basis, with the starting point for commuter parking being the standards in Table 10.4 with differences in employment densities taken into account. Flexibility may then be applied in light of site-specific circumstances as above. Operational parking should be considered and justified separately.
8. The appellant has reviewed the methods of travel to work for the local area using the 2011 census data which the site is located in. Based on this and the estimated modal shift for the appeal site (24% travel to work by sustainable modes of transport) the appellant calculates a requirement for 211 parking spaces (78 more than proposed) at the site. This excludes the shift changeover period when demand is higher.
9. Nevertheless, the 2011 census data is considerably dated and despite the assertions about the robustness of the above calculation, this is based on an estimated modal shift. There is also no clear assessment and differentiation between the actual parking requirement for commuters and operational vehicles for the site. In any event, even if the appeal were to succeed, the proposal would not meet the appellant's total parking requirements and there is no certainty that this would alleviate operational issues and safety concerns indicated by the appellant.
10. Moreover, Policy T4 of the LP requires that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Policy T1 of the LP states that development proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041 and Policy T5 of the LP, states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle.
11. Most notably, the appeal site is in walking distance of Hatton Cross Tube Station (with a regular Piccadilly Line service operating between 05:00-01:00) and Bus Interchange with services to local areas and further afield to Croydon, Kingston, Sunbury and Staines, including some Night Bus Services. There are also bus stops outside the site, served by three frequent bus routes (203; 423; and 482) which serve Hounslow, Staines, Cranford and Southall.
12. However, the proposal appears to provide a car only based approach, with no evidence of sustainable travel options having been considered and implemented for reducing car demand, other than the suggestion that a Travel Plan be provided via a planning condition and a willingness to accept a condition requiring an increase in the external cycle parking (which is already underused) and the monitoring of the usage of this as part of a Travel Plan.
13. Whilst acknowledging that a Travel Plan has the potential to reduce single car occupancy travel and, in turn, lessen parking demand, the appellant asserts that a Travel Plan would not alleviate the capacity issues alone. This assertion,

in part, is based on evidence on Travel Plans from the Department of Transport, the full details of which are not before me. Irrespective, there is no site-specific information on the reduction in demand for car parking levels, which the range of measures identified in the appeal submissions to promote sustainable travel could achieve.

14. Although the Council's first reason for refusal refers to Policy EC1 of the London Borough of Hounslow Local Plan (HLP), this Policy seeks to secure investments to existing and future strategic transport connections, and there is nothing to suggest that this is directly relevant to the proposal before me. I, therefore, find no conflict with this Policy.
15. Nonetheless, drawing on the above reasons, it has not been clearly shown that the level of additional car parking proposed is necessary and justified. Consequently, the provision of additional parking spaces would encourage the use of private vehicles and the proposal would be contrary to the sustainability aims of the development plan. In particular, Policy EC2 of the HLP, which aims to secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm and improves health and well-being. Accordingly, I also find conflict with Policies T1, T4, T5 and T6 of the London Plan, 2021.

Character and appearance

16. The appeal site forms part of a Locally Significant Industrial Site, which is commercial in character and mainly comprises, large, well-designed buildings, set behind landscaped frontages with associated surface car parking.
17. The proposed parking deck would span over most of the existing surface car park, which comprises a substantial area and is prominently located on the junction of Girling Way and A30. The parking deck would be about 2.88m above ground level bounded by a 1.1m high guard rail with galvanised steel mesh infill with a total height of about 4.14m (excluding any lighting columns).
18. Due to the combination of the area of the car park and its overall height, the proposed parking deck would make for a sizeable new structure. Furthermore, this would be located separate from the existing building and forward of this relative to the A30, placing it close to the perimeter fencing.
19. Because of the relatively transparent design of the existing perimeter fencing and limited landscaping along the A30 frontage to the existing car park, the parking deck would be particularly exposed. Therefore, despite its subordinate size in comparison to the existing building, because of its siting and scale it would emerge over the fence and appear particularly conspicuous.
20. The (north-western) elevation of the parking deck, facing the A30 would incorporate vertical timber fins along the guard rail, and includes planter boxes sited between every column to facilitate climbing plants. Nevertheless, the planting coverage would not be immediate and on the information before me would not be enough to provide appreciable relief or screening to the structure.
21. Also, based on the available information the timber fins and planter boxes do not feature on the elevation facing Girling Way. Therefore, and notwithstanding the existing landscaping along here, this would give the structure an incomplete appearance and reflects poor design.

22. The appellant has referred me to the design and position of the plant enclosure which faces the highway on a neighbouring building to the north-east of the appeal site. This, however, is integral to the design of that building and therefore is not directly comparable to the proposal before me. I have also taken account of the extent and scale of the commercial vehicles within the site. However, these do not have the permanency associated with the proposal.
23. Consequently, the combination of the siting, scale and appearance of the proposal would make it a particularly uncharacteristic and incongruous structure, which would detract from the character and appearance of the area.
24. As such, the proposal would conflict with HLP Policy CC1, which amongst other things aims to secure development that sensitively and creatively responds to an areas character. I also find conflict with HLP Policy CC2 which amongst other matters seeks to promote and support high quality urban design and architecture.

Conclusion

25. For the above reasons, I conclude that the appeal should be dismissed.

M Aqbal

INSPECTOR