



Appeal Decision

Site visit made on 30 September 2025

by K Lancaster BA (hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 22 October 2025

Appeal Ref: APP/F5540/W/25/3367130

Land to East of Staines Rugby Football Club, Snakey Lane, London TW13 7NB

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mr Roy Mistry on behalf of Size Logistics Ltd against the decision of the Council of the London Borough of Hounslow.
 - The application Ref is P/2024/2950 .
 - The development proposed is the erection of a storage unit and associated parking, including new site entrance.
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Decision

1. The appeal is dismissed.

Main Issues

2. The main issues are:
 - Whether the development would be inappropriate development in the Green Belt;
 - The effect on the openness and purposes of the Green Belt;
 - The effect of the proposed development on the character and appearance of the area;
 - Whether the appeal site is a suitable location for the proposed development having particular regard to the development plan;
 - The effect of the proposed development on ecology, including whether the proposed development would deliver Biodiversity Net Gain;
 - Whether the proposed development would meet carbon reduction standards and achieve sustainable design to mitigate and adapt to climate change;
 - The effect of the proposed development on highway safety; and
 - Whether any harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations, so as to amount to the very special circumstances required to justify the proposal.

Reasons

3. The appeal site relates to a small parcel of land accessed of Snakey Lane. It is located within the Metropolitan Green Belt. The surrounding area is predominantly

open land interspersed with vegetation. Staines Rugby Football Club is located further to the west of site, and a garden centre is further to the northwest of this site. The access to the allotment garden is located on the opposite side of the road to the appeal site.

Whether Inappropriate Development

4. The appeal site lies within the Metropolitan Green Belt. Paragraph 142 of the National Planning Policy Framework (the Framework) states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Paragraph 152 of the Framework states that inappropriate development, is by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
5. The Framework establishes that the construction of new buildings in the Green Belt should be regarded as inappropriate, subject to a number of exceptions as set out in Paragraph 154. Paragraph 154(g) allows for limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or continuing use, which would not cause substantial harm to openness of the Green Belt
6. The proposed development would involve the construction of a building, which the appellant has confirmed would be used for storage purposes in connection with an existing business. In their appeal statement the appellant refers to the previous use of the site for stables but also refer to the site as a historical industrial site. However, I have not been provided with details of any relevant planning history for the site and at the time of my site visit the appeal site did not appear to be in use, nor any buildings present. Consequently, in the absence of any substantive evidence regarding the previous lawful use of the site, I find that the proposal would not involve the redevelopment of previously developed land. Therefore, it would not comply with Paragraph 154(g) of the Framework.
7. Paragraph 155 of the Framework states that the development of homes, commercial and other development should also not be regarded as inappropriate if all of the specified criteria are met. However, there is no substantive evidence before me to indicate that the proposed development would be on grey belt land, nor that there is a demonstrable unmet need for the development proposed. Accordingly, it has not been demonstrated that the proposed development would meet this exception.
8. For the reasons given above, the proposed development would comprise inappropriate development that would, by definition, be harmful to the Green Belt. Therefore, it would be contrary to the Framework, Policy G2 of the London Plan 2021 and Policy GB1 of the Hounslow Borough Local Plan 2015 (the HBLP) which, amongst other things, requires that planning applications within the Green Belt are considered in line with the provisions of the Framework and to ensure the Green Belt is protected from inappropriate development.

Openness

9. The Framework establishes that the primary purpose of the Green Belt is to prevent urban sprawl by keeping land permanently open. Openness has both spatial and visual aspects.
10. The proposed development would involve the construction of a detached, industrial-style building, along with associated hardstanding and boundary fencing. This would introduce built form and hard surfacing into an area that is currently free from development. As such, it would result in the loss of openness in both visual and spatial terms. Whilst the impact on openness may be limited in isolation, it would nonetheless give rise to a moderate degree of harm.
11. For the reasons outlined above, the proposed development would cause harm to the openness of the Green Belt in both spatial and visual terms. Although the extent of harm would be limited due to the modest scale of the proposal, it would still fail to preserve the openness of the Green Belt, contrary to the fundamental aim of the Framework.

Character and Appearance

12. The appeal site is surrounded by open land, interspersed with vegetation and trees, including some within the appeal site itself. There are no buildings immediately adjacent to the site
13. The proposed building would be single-storey, and would measure approximately 10 metres by 6 metres, with an overall height of 5.63 metres. It would be constructed of grey prefabricated metal cladding, with a pitched roof and roller shutter door. It would have a small forecourt immediately to the front of the proposed building, which would provide parking. The proposed building would be set back approximately 13.9 metres from the highway and would be enclosed by a boundary fence, with gates opening inwards.
14. By virtue of its siting, design and massing, the proposed building would be a visually discordant development within the surrounding area. Furthermore, there are no details of any landscaping proposals which would retain existing landscape features or provide additional landscaping to soften the appearance of the proposed building. Consequently, the proposal would erode the verdant character of the appeal site and surrounding area. Thus, it would fail to respond positively to the character and appearance of the area, which in this particular case is predominantly open land.
15. The appellant describes the surrounding area as being characterised by high density developments, which they state includes examples of 3 and 4 storey buildings and one 8 storey building to the West. However, these buildings are some distance from the appeal site and with the exception of Staines Rugby Club, there are no other buildings on this side of Snakey Lane.
16. For these reasons, I therefore find that the proposed development would cause unacceptable harm to the character and appearance of the area. Thus, it would be contrary to Policies CC1 and CC2 of the HBLP which require amongst other things, high-quality design that responds to the context and character of the area.

Suitable Location

17. Policy E4 of the London Plan 2021 seeks to manage and make efficient use of employment land through intensification and co-location. Policy ED1 of the HBLP seeks to direct employment development to allocated sites, town centres, and strategic industrial sites, Locally Significant Industrial Sites and other existing industrial sites.
18. The appeal site is not an existing employment site, nor is it allocated for such purposes within the HBLP. In terms of adjacent land uses there is a rugby club, allotments and garden centre. There is no industrial or commercial development similar to the appeal proposal within the immediate surrounding area. Furthermore, there is limited evidence provided with the appeal to demonstrate why the proposed development could not be located on existing employment land, or allocated site.
19. Consequently, I therefore find that the appeal site would not be a suitable location for the proposed development. Therefore, it would be contrary to Policy E4 of the London Plan 2021 and Policy ED1 of the HBLP, which seek amongst other things, to direct employment development to allocated or existing sites and to support intensification and co-location of employment land.

Biodiversity Net Gain

20. Biodiversity Net Gain (BNG) is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (the TCP Act) (inserted by the Environment Act 2021 (the Environment Act)). Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met. For minor development, this applies for proposals submitted after 2 April 2024 and the date on the application form is 2 September 2024.
21. The submitted application form indicates that the proposed development should be exempt on the basis that it's a self-building proposal. However, for the purposes of BNG, the Planning Practice Guidance defines self-build and custom build development as development which consists of no more than 9 dwellings, is carried out on a site which has an area no larger than 0.5 hectares and consists exclusively of dwellings which are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015. Therefore, as the appeal proposal relates to a storage building and not a dwelling, this exemption cannot apply.
22. Article 7(1A) of the Town and Country Planning (Development Management Procedure) Order 2015 (as amended) sets out the minimum information that should accompany applications that are subject to the BNG requirement. However, no BNG information accompanies the appeal. Therefore, in the absence of a completed metric calculation tool showing robust calculations of the pre-development biodiversity value of on-site habitat, and the other statutory minimum information requirements, the mandatory BNG requirements would not be met.
23. Consequently, it has not been demonstrated that the proposed development would comply with Schedule 7A of the Town and Country Planning Act 1990. The proposed development would also be contrary to Policy GB7 of the Local Plan

which seeks amongst other things to protect and enhance the natural environment and seek to increase the quantity and quality of the borough's biodiversity.

Carbon Reduction and Sustainable Design

24. Policy EQ1 of the HLP requires all development to meet the carbon emission reduction requirements set out in the London Plan. Policy EQ2 of the HLP seeks to promote the highest standards of sustainable design and construction in development to mitigate and adapt to climate change.
25. Whilst the proposed development would include the provision of two electric vehicle charging stations, the submitted plans include no details of any other measures to reduce carbon emissions or achieve sustainable design to mitigate and adapt to climate change.
26. Consequently, in the absence of detailed information to demonstrate compliance with the above policy requirements, I cannot be satisfied that the development would meet with the carbon reduction standards and sustainable design objectives set out in Policy EQ1 and EQ2 of the HBLP.

Highway Safety

27. The proposed development would require a new access to be created on to Snakey Lane, which I observed is a busy road with a 40mph speed limit. The proposed access would be opposite an access road to the nearby allotments.
28. The submitted plan is annotated to indicate that visibility splays of 65 metres in each direction would be provided. However, the submitted plans do not clearly show the full extent of the visibility splay, nor do they appear to account for the highway verge which contains significant vegetation. There is also a junction immediately opposite the appeal site which serves the nearby allotments. On this basis, I find that it has not been demonstrated that the proposed development would not result in adverse impacts on existing traffic flows and this junction entrance.
29. Whilst the submitted site plan also shows parking for two cars, both with EV chargers, there is no provision for the parking of larger vehicles. Furthermore, it has not been demonstrated that there is sufficient space for manoeuvring within the site, particularly for any larger vehicles which may need to enter the site.
30. For these reasons, I therefore find that it has not been demonstrated that the proposed development would not cause adverse harm to highway safety. Thus, it would be contrary to Policies T4 and T7 of the London Plan and Policy EC2 of the HBLP which require amongst other things, that adverse impacts on the transport network are avoided and maximises opportunities for walking, cycling and public transport.

Other Considerations

31. Paragraph 153 of the Framework states that substantial weight should be given to any harm to the Green Belt and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

32. The proposed building would be used for storage purposes and would support an existing business. However, no details of the existing business have been provided nor any justification for why the building is needed to support the business. I therefore only attribute this limited weight.
33. The appellant states that the development of the site has already commenced and that this together with the clear desire of the appellant to develop, outlines that the prospect of development is more than a merely theoretical and considers that this should be given substantial weight. However, based on the evidence before me, I understand that there is no planning history for the site and therefore no approved development upon which the appellant can rely on as a fall-back position. Therefore, whilst I note the appellant's strong intention to develop the site, this does not represent a fallback position and as such does not alter my above findings.

Green Belt Balance

34. For the reasons given above, the proposed development would be inappropriate development, which the Framework clearly sets out is, by definition, harmful to the Green Belt and a matter to which I afford substantial weight. I have also found that the proposed development would reduce the openness of the Green Belt, which gives rise to additional harm.
35. The proposed development would also cause unacceptable harm to the character and appearance of the area, biodiversity and highway safety. Additionally, the proposed development has also failed to demonstrate that it would be in a suitable location and would meet with the carbon reduction standards and sustainable design objectives set out in the HBLP. Together, I attribute these other harms significant weight.
36. Balanced against the substantial harm, the other considerations advanced by the appellant are not sufficient, either individually or cumulatively, to clearly outweigh the harm to the Green Belt. Consequently, the very special circumstances necessary to justify the development do not exist.

Conclusion

37. For the reasons given, the proposal would therefore not accord with the development plan when taken as a whole. There are no material considerations of sufficient weight that indicate the appeal should be determined other than in accordance with the development plan. The appeal is therefore dismissed.

K Lancaster

INSPECTOR