

**Response to Planning Authority Appeal Statement  
of Kevin Lang  
(on refusal of planning application)**

Axis House 242 Bath Road Sipson

Between:

London Borough of Hillingdon  
(Local Planning Authority)

and

Acre Hotels Ltd  
(the Appellant)

PINS Ref: APP/R5510/W/23/3327482

LPA Ref: 43794/APP/2021/3685

20<sup>th</sup> March 2024

## **1. Introduction**

- 1.1 This statement has been prepared in response to the opportunity to comment on the Local Planning Authority (LPA) Appeal Statement. Within this statement I will review the reasons given by the LPA for refusal and provide comments clarifying the issue for the benefit of the Inspector and why I disagree with the LPA findings and Conclusions.

## **2 Reasons for Refusal 1**

- 2.1 London Borough of Hillingdon (LBH) issued their Appeal Statement to the Planning Inspectorate (PINS). Under reason for refusal 1 in their statement they say that Axis House comprises of 71 flats and is served by 70 car parking spaces. The original conversion of the property was approved under application reference APP/2014/1542 for 64 flats and 64 parking spaces. TfL as a statutory consultee commented on the application and considered the parking provision to be excessive and needed it to be significantly reduced otherwise the overprovision of parking would encourage higher car ownership and attract more vehicle trips to the site. For this reason, they could not support the granting of prior approval for the redevelopment of the site. However, the LPA stated that at a ratio of 1:1.09 spaces per dwelling this complied with their policy and provision should be capped at 64 spaces.
- 2.2 The LPA maintains the loss of 42 spaces would result in the displacement of parked vehicles on to the surrounding roads, as residents of Axis House will not be able to park on site. In my appeal statement I was very clear that the parking at Axis House had been split and that there was only 28 parking spaces available for residents, the remainder of the old office carpark had been barriered off. It is understood that for many years the residents of Axis House has only been able to access the 28 spaces, so any displacement of parking from the appeal site would have already have taken place, therefore proposals will not result in the displacement of parked vehicles onto the surrounding road.
- 2.3 Also to address the LPA concerns about resident parking associated with Axis House during the application, two parking surveys were undertaken on the nights of 10th and 16th November 2022 in line with the Lambeth methodology. There were 28 spaces to the front of Axis House controlled via an automatic barrier for use by residents, the remainder of the car park for the old office block was barriered off and at the time of the surveys was empty.
- 2.4 The survey of the 28 spaces accessible to residents found that on the first survey there was 18 vehicles parked and during the second there was 19 parked vehicles. This demonstrates that the current provision of 28 spaces is more than sufficient for residents of Axis House and there will no displacement of parked vehicles as there were spaces available on site for residents to use.

- 2.5 The second part for the LPA's reason was that the Appellant had not addressed concerns raised in the delegated report regarding the use of PTAL. They state *"Whilst the appellant is correct in stating that the Highway Authority agree that the site does fall within a PTAL area of 4 boarding 3 PTAL is a rating given to a site based on a number of metrics put in place by TFL. PTAL does not provide an accurate reflection of the sites access to public or other non-vehicle methods of transport and this case demonstrates this. In this case the PTAL ranking is slightly deceptive as the score is skewed by the site's proximity to London Underground stations Heathrow Terminal 1, 2 and 3, Heathrow Terminal 4 and Heathrow Terminal 5. There is no bicycle or walking access to these stations all of which are situated deep inside the airport site. In practice these railway stations do not offer the residents of Axis House genuine travel choice."*
- 2.6 The LPA do not seem to have appreciated how the PTAL is assessed. Transport for London (TfL) state that *"PTALS are a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. The method is essentially a way of measuring the density of the public transport network at any location within Greater London"*.
- 2.7 The PTAL for the appeal site is 4 based on the TfL WebCAT website. have suggested that the PTAL for the application site is elevated above what it should be given the proximity of the rail services in the airport but are not reachable by foot or cycle, so the PTAL is lower than 4.
- 2.8 The first stage in assessing PTAL is to calculate the walking distance from the site to known public transport facilities, bus stop, train station etc. Only facilities within a certain distance should be included for bus stops this is 640m and 960m for rail stations, (which correspond to a walking time of 8 minutes and 12 minutes respectively).
- 2.9 The next stage is to determine the service level during the peak. The total access time for each route is then calculated by adding together the walking time and the average waiting time for services on the route. This is converted to an equivalent doorstep frequency (EDF) by dividing 30 (minutes) by the total access time.
- 2.10 Weighting is applied to each mode to simulate the enhanced reliability and attractiveness of a route with a higher frequency, the highest frequency is given a weighting of 1.0, with all other routes in that mode weighted at 0.5.
- 2.11 Finally, the EDF and the weighting are multiplied to produce an accessibility index for each route, and the accessibility indices for all routes are summed to produce an overall accessibility index. This is then converted to a PTAL grade (1–6) through a banding system (where AIs 0.00–5.00 are PTAL 1, 5.01–10.00 are PTAL 2, etc. up to PTAL 6 for scores of 25 and above).

- 2.12 In my original statement I made clear that the TfL PTAL did not include the rail services within the Airport and was based on the bus services in the vicinity of the appeal site. Below is an extract of the calculation of the TfL PTAL rating for the appeal site. As can be seen there are 9 bus services within 640m of the appeal site which gives an AI of 16.45 which is PTAL 4.

| Calculation data    |                          |       |                   |                 |                  |            |            |      |        |       |
|---------------------|--------------------------|-------|-------------------|-----------------|------------------|------------|------------|------|--------|-------|
| Mode                | Stop                     | Route | Distance (metres) | Frequency (vph) | Walk Time (mins) | SWT (mins) | TAT (mins) | EDF  | Weight | AI    |
| Bus                 | BATH ROAD THREE MAGPIES  | U3    | 329.45            | 5               | 4.12             | 8          | 12.12      | 2.48 | 0.5    | 1.24  |
| Bus                 | BATH ROAD/SIPSON ROAD    | 111   | 116.58            | 7               | 1.46             | 6.29       | 7.74       | 3.87 | 0.5    | 1.94  |
| Bus                 | BATH ROAD/SIPSON ROAD    | 81    | 116.58            | 5               | 1.46             | 8          | 9.46       | 3.17 | 0.5    | 1.59  |
| Bus                 | BATH ROAD/SIPSON ROAD    | 222   | 116.58            | 7.5             | 1.46             | 6          | 7.46       | 4.02 | 0.5    | 2.01  |
| Bus                 | BATH ROAD/SIPSON ROAD    | 285   | 116.58            | 6               | 1.46             | 7          | 8.46       | 3.55 | 0.5    | 1.77  |
| Bus                 | BATH ROAD/SIPSON ROAD    | 105   | 116.58            | 6               | 1.46             | 7          | 8.46       | 3.55 | 0.5    | 1.77  |
| Bus                 | BATH ROAD/SIPSON ROAD    | 140   | 116.58            | 8.5             | 1.46             | 5.53       | 6.99       | 4.29 | 1      | 4.29  |
| Bus                 | BATH ROAD/SIPSON ROAD    | 423   | 116.58            | 3               | 1.46             | 12         | 13.46      | 2.23 | 0.5    | 1.11  |
| Bus                 | N PERIMETER RD NENE ROAD | X26   | 310.72            | 2               | 3.88             | 17         | 20.88      | 1.44 | 0.5    | 0.72  |
| Total Grid Cell AI: |                          |       |                   |                 |                  |            |            |      |        | 16.45 |

- 2.13 Therefore, it must be concluded that the sites PTAL rating of 4 is representative of the site's accessibility to the local public transport facilities.
- 2.14 The LPA maintains that they have undertaken a thorough assessment of the appeal scheme and the sites sustainability and have provided a realistic, site specific set of comments as opposed to a strategic overview adopted by the appellant. Yet they have clearly misinterpreted the sites PTAL rating by assuming the rail services in the airport have been included in the PTAL calculation.
- 2.15 Also, they state that the nearest convenience store is Co-op food, 1.1 miles on Harlington High Street. However, there is a small convenience store at the Shell garage at the junction of Bath Road and Sipson Road 190m to the west. A further convenience store, Sovereign Food & Wine, on Sipson Road 330m away and J A Supermarket is located 800m to the west on Sipson Way. It is evident that there are closer facilities, near to open amenity area "Parks and Playgrounds" and a number of Take-Aways. I would therefore suggest the LPA have adopted a strategic overview in generalising services contributing to the PTAL rating rather than assessing the actual services in reality. I wish to be clear that following my transport assessment and first appeal statement, I have further considered the site's transportation/parking matters.
- 2.16 The LPA correctly points that the appeal site is located in a parking management scheme.
- 2.17 The LPA state that there are 268 households on the immediate roads around the appeal site and that they have issued 59 permits to residents, they have also calculated that there is an on street parking capacity of 58 spaces. The LPA have used this to assume that all 59 permit holders park on the road every day.

- 2.18 This was not borne out by the parking surveys conducted in 2016 where it demonstrated that there was spare capacity in the roads within 200m walking distance of the appeal site, there is nothing to suggest things have substantially changed. It has not been possible to survey the roads, but if the LPA wished to prove that the roads are at capacity, they could have counted the parked vehicles instead of assuming the roads are at capacity.
- 2.19 The LPA have also cited the issue of 398 Penalty Charge Notices (PCN) in a 2 year period up to January 2024 in justifying that parking stress in the area is high. Given that all 268 households are entitled to apply for a permit it seems strange why so many PCN's have been issued as it would be cheaper for residents to have a permit. It is well known that minicabs use this area to park while waiting for the pickups from the airport, so a number of the PCN's could be associated with the minicabs and not inappropriate parking by residents.
- 2.20 The LPA have not identified if the PCN's were issued for inappropriate parking across driveways or on double yellow lines, or for failure to display a valid permit. If it is the latter this means that there must have been spare capacity on the roads to allow these vehicles to park which undermines the LPA's argument that the on-street parking stresses are high.
- 2.21 I would suggest that the majority of the PCN's are not associated with residents, the uptake in permits is low compared to the number of households that are entitled to a permit, indicating the parking stresses are not as high as the LPA believe to be the case. The LPA are also implying that the displaced vehicles from Axis House will add to the parking stresses. However this is incorrect as the current parking provisions are more than adequate to cater for the demands of residents on site as demonstrated above and therefore the proposed development will not result in the displacement of park vehicles associate with Axis House.
- 2.22 The LPA refused the application on the grounds that loss of parking associated with the previous consent to convert Axis House to a residential use would result in displaced drivers parking on the surrounding roads causing potential hazards. The LPA statement has raised issues regarding the PTAL rating of the site, local facilities and potential displacement of parked vehicles.
- 2.23 The above has clearly demonstrated the PTAL assumed for the appeal site is correct and the site has an accessibility level of 4. Also, all the evidence suggests that the 28 spaces available to residents at Axis House is adequate to serve the demand of the 71 flats in Axis House. The LPA do not appear to have appreciated the residents of Axis House have not been able to park on the application site for some years and have been limited to the 28 spaces adjacent to Axis House. They have also been unable to provide any hard facts to demonstrate the current provision of 28 spaces can not accommodate the parking demand from Axis House by way of surveyed parked vehicles to demonstrate that there is over spill parking on the surrounding roads.

- 2.24 Given that residents of Axis House have not been using the appeal site for parking if there was going to be any displacement of parking it would have already occurred, so developing the appeal site will not displace more residents as they have been able to use it.
- 3 In conclusion, I do not believe the development of the appeal site will result in the displacement of parked vehicles serving Axis House. They do not have access to parking on the appeal site and surveys of the 28 spaces accessible by residents of Axis House showed there was spare capacity overnight when the resident parking would be at its highest. Therefore, the concerns of the LPA and the first reason for refusal are not justified as it has been clearly demonstrated there will be no displacement. In my view, experience and site-specific considerations the application should not have been refused on this ground.

