



Highway Planning Ltd

Highways & Transportation Consultants

**68 – 76 ALBERT ROAD,
YIEWSLEY,
UB7 8ES**

MR H PUREWAL

APPEAL STATEMENT

LPA REF: 33654/APP/2020/2582

MAY 2021

59 Barnards Hill, Marlow, Bucks, SL7 2NX

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1.0 INTRODUCTION

- 1.1 Highway Planning Ltd has been appointed by Mr H Purewal to provide highway support to the appeal against the refusal of Prior Approval for the addition of 4 x 1 bed flats at 68 – 76 Albert Road, Yiewsley.
- 1.2 Application 33654/APP/2020/2582 sought Prior Notification approval for the addition of 2 floors on top of the existing building to provide 4 x 1 bed flats. This would be permitted development under Class A of the GPDO.
- 1.3 The Council considered that the scheme did not comply with the requirements of Class A for several reasons including concerns over the highway and transport impact of the proposals. The Decision Notice is dated 17th November 2020.

2.0 SITE LOCATION AND PROPOSED DEVELOPMENT

- 2.1 The site is located on the east side of Albert Road and approximately 35m south of the junction of Albert Road and Fairfield Road. The site comprises 5 flats (1 x studio and 4 x 1 bed flats) over 3 floors. There is an access to Albert Road which leads to a car parking area to the rear of the building.
- 2.2 Albert Road is a local access road that forms a link between Horton Road and Fairfield Road. The southern portion of Albert Road is predominantly residential in nature. The northern section, within which the site is located, has a mixed residential and commercial nature. Albert Road is subject to a 20mph speed limit and on-street parking is



regulated by a Controlled Parking Zone (including some business permit parking bays).

- 2.3 The site is located within 160m walk distance of West Drayton High Street which provides a wide range of retail and commercial facilities. The High Street and a selection of adjoining roads including Fairfield Road are included in the designated town centre for West Drayton as shown on the adopted Local Plan Part 2 Policies Map. The site has a PTAL rating of 3 as shown on the TfL PTAL report included at **Appendix 1**.

- 2.4 The proposed development comprises the addition of 2 floors on to the existing building to provide 4 x 1 bed flats with associated car and cycle parking.

3.0 HIGHWAY AND TRANSPORTATION CONSIDERATIONS

- 3.1 The requirements of Class A, Part 20 of the GPDO 2020 state that the transport and highways impacts of the development must be assessed by the local planning authority. Paragraph B(5) states that “...*where in the opinion of the local planning authority the development is likely to result in a material increase or a material change in the character of traffic in the vicinity of the site, the local planning authority must consult the [relevant] highway authority*”.
- 3.2 The test therefore is whether the proposed development would result in a material increase or a material change in the character of traffic.
- 3.3 In considering the Prior Approval submissions the Council's highway officer raised concerns relating to the level of car parking provision, the suitability of the cycle storage facilities and the need for some parking spaces to be fitted with electric vehicle charging points. The highway officer's consultation response is embedded in the Council officer's



report for the application and reference is made to the Hillingdon Local Plan: Part 2 Development Management Policies (2020) and to the draft London Plan - Intend to Publish (December 2019) in respect of the requirement for EV charging points. The Council's Decision Notice is dated 17th November 2020 and therefore could not have included the policy advice now contained within the adopted London Plan 2021. As the London Plan takes precedence it will be applied to the assessment of the development proposals below.

Car Parking Provision

- 3.4 The existing building contains 4 x 1 bed flats. There is a parking area to the rear of the flats which contains a mixture of spaces demarked on the ground and also on the wall (by signage). Included in **Appendix 2** are photographs taken on 27th April 2021. The most recent planning consent for the site (ref: 33654/APP/2009/321 change of use from B1 office to C3 residential (studio flat)) included a car parking layout. A copy of the approved drawing is included at **Appendix 3**. It is clear that the car parking layout did not comply with any recognised standards and would have been impractical. The 4 parking spaces that are demarked on the ground at the rear of the building are similar to the 2009 layout. Notwithstanding what parking layout may have been accepted previously there is no doubt that the current parking arrangements are occur through convenience rather than any adherence to standards.
- 3.5 The proposed plans included a car parking layout that shows the provision of 7 parking spaces. The highway officer considers the parking requirement for the development to be between 9 and 14 spaces. This approach is inappropriate. The highway officer is applying the Hillingdon Local Plan parking standard of between 1 space and 1.5 spaces to the existing 5 flats and then also to the proposed 4 flats. The parking arrangements for the existing flats are pre-existing and Policy T6 (L) of the London Plan states,



“Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy”.

- 3.6 It is not appropriate for the highway officer to seek to remedy the pre-existing parking shortfall, if a shortfall exists. The London Plan parking standard for 1 bedroomed flats in a location with a PTAL rating of 3 is “up to 0.75 spaces per unit”. As such, the proposed development is required to provide **up to 3** spaces in excess of the pre-existing parking provision.
- 3.7 **If** it is necessary to assess the level of parking that the existing flats should have then the London Plan standard should be applied, as per policy T6(L). For the existing 5 flats this is a requirement of up to 3.75 spaces. Therefore, a total parking requirement of up to 6.75 spaces.
- 3.8 The proposed plans showed the provision of 7 parking spaces which would comply with the maximum requirement stated above. However, the highway officer was concerned that the parking layout was impractical in that it did not provide suitable manoeuvring space and would result in an increase in demand for on-street parking. It is important to note that the highway officer was content for 2 of the proposed flats to be “car free” i.e., not to have any car parking provision. This acceptance by the highway officer would reduce the parking requirement by 1.5 spaces to 5.25 spaces.
- 3.9 Whilst the submitted site layout shows the provision of 7 spaces the available manoeuvring space is limited. It is possible to provide an alternative layout with 5 wide spaces (3.3m wide) where the ability for vehicles to turn within the site and exit onto Albert Road in a forward gear is maximised. This is a significant improvement over the existing situation where there is no formal layout and the parking area is not



used efficiently. There is a trade-off between the minor shortfall of 0.25 spaces and the ability to secure a more efficient and safer parking layout for the existing and proposed flats. The revised layout includes a space suitable for a disabled driver to comply with Policy T6.1(G) of the London Plan. The revised parking layout and swept path plots are shown on drawing 21.63 – 001 attached hereto.

- 3.10 As required by policy T6(G) of the London Plan the revised parking layout can incorporate EV charging points and this is a matter that can, and should, be covered by a suitable planning condition.
- 3.11 The site is within a CPZ where on-street parking is available to permit-holders only between 8am and 6.30pm Monday to Saturday. This does not preclude non-permit holders from parking in the area outside of the CPZ operational hours. New residents viewing the proposed flats will be aware of the parking restrictions in the vicinity and on-site and will make their decision to occupy a flat accordingly.

Cycle parking

- 3.12 There is no cycle parking for the existing flats. The proposed scheme included the provision of 10 cycle parking spaces with 8 of these located at the front of the building and 2 within the storage area on the ground floor of the building. The highway officer raised a concern that the cycle spaces at the front of the building would be vulnerable to vandalism and would not therefore be attractive to residents.
- 3.13 The Council's calculation of the number of cycle spaces required for the development is incorrect. The cycle parking standard within Table 10.2 of the London Plan is the provision of 1 space per 1 bed unit i.e., a total of 4 cycle spaces for the proposed development. It is not necessary for the development to make up the existing shortfall for the



existing flats. As such, it is possible to locate 4 cycle spaces within the storage area on the ground floor of the building.

4.0 CONCLUSIONS

- 4.1 The test to be applied to the transportation and highway aspects of the proposals is whether there would be a material increase or a material change in the character of traffic. This is underwritten by the requirement of paragraph 109 of the NPPF that development proposals should only be refused or prevented on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.2 It has been demonstrated that the development proposals will deliver an improved car parking layout that will provide a more efficient use of the car parking area to the benefit of existing and future residents. On-street parking in the vicinity is regulated through a Controlled Parking Zone and, as such, the development will not result in an unacceptable impact on highway safety.
- 4.3 The revised car parking layout will incorporate EV charging points.
- 4.4 The level of cycle parking required by the development proposals can be accommodated within an appropriate and secure area in the existing building.
- 4.5 In the light of the above, the Inspector is respectfully requested to allow the appeal.



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DRAWING 21.63 - 001



										REV		AMENDMENTS				DRAWN		CHKD		DATE	
										Job Title											
										68-76 ALBERT STREET, YIEWSLEY											
										Client											
										MR H PUREWAL											
										Drawing Title											
										SWEPT PATH PLOTS											
										Scale		Date		Designed		Drawn		Drawing No		Rev	
										1:200 @ A3		04 MAY 21		DFM		DFM		21.63 - 001			

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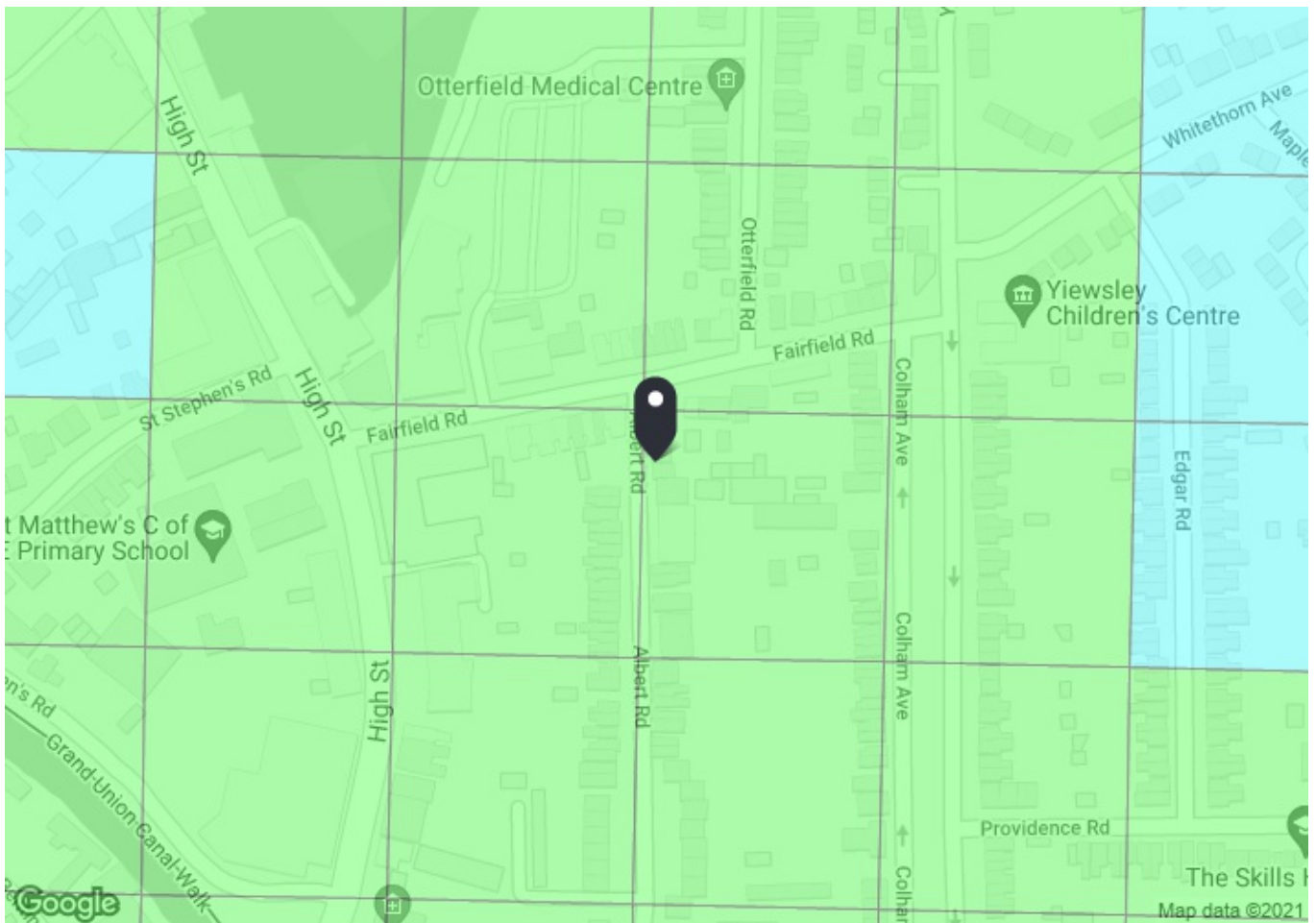


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APPENDIX 1



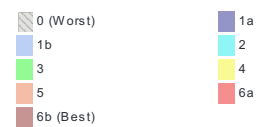
PTAL output for Base Year 3

74 Albert Rd, West Drayton UB7 8ES, UK
Easting: 506202, Northing: 180473

Grid Cell: 80076

Report generated: 29/04/2021

Map key - PTAL



Map layers

 PTAL (cell size: 100m)

Calculation Parameters

Day of Week	M-F
Time Period	AM Peak
Walk Speed	4.8 kph
Bus Node Max. Walk Access Time (mins)	8
Bus Reliability Factor	2.0
LU Station Max. Walk Access Time (mins)	12
LU Reliability Factor	0.75
National Rail Station Max. Walk Access Time (mins)	12
National Rail Reliability Factor	0.75

Calculation data

Mode	Stop	Route	Distance (metres)	Frequency(vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI
Bus	HIGH STREET YIEWSLEY	U5	321.16	5	4.01	8	12.01	2.5	0.5	1.25
Bus	HIGH STREET YIEWSLEY	222	321.16	7.5	4.01	6	10.01	3	1	3
Bus	HIGH STREET YIEWSLEY	U3	321.16	5	4.01	8	12.01	2.5	0.5	1.25
Bus	HIGH STREET YIEWSLEY	U1	321.16	4	4.01	9.5	13.51	2.22	0.5	1.11
Bus	HORTON ROAD ALBERT ROAD	350	254.41	5	3.18	8	11.18	2.68	0.5	1.34
Rail	West Drayton	'PADTON-OXFD 2N14 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'PADTON-OXFD 2N16 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'PADTON-OXFD 2N18 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'PADTON-OXFD 2N22 '	657.8	0.67	8.22	45.53	53.75	0.56	0.5	0.28
Rail	West Drayton	'PADTON-OXFD 2N24 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'RDNGSTN-PADTON 2P09 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'OXFD-PADTON 2P11 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'RDNGSTN-PADTON 2P12 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'RDNGSTN-PADTON 2P14 '	657.8	1.33	8.22	23.31	31.53	0.95	0.5	0.48
Rail	West Drayton	'RDNGSTN-PADTON 2P17 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'OXFD-PADTON 2P18 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'BNBR-PADTON 2P20 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'SLOUGH-PADTON 2P25 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'SLOUGH-PADTON 2P32 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15
Rail	West Drayton	'PADTON-RDNGSTN 2R13 '	657.8	1.67	8.22	18.71	26.94	1.11	1	1.11
Rail	West Drayton	'PADTON-TWYFORD 2R21 '	657.8	0.33	8.22	91.66	99.88	0.3	0.5	0.15

Total Grid Cell AI: 11.76



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APPENDIX 2

REAR OF 68 – 76 ALBERT ROAD, YIEWSLEY



4 parking spaces are marked out on the ground, perpendicular to the eastern boundary



4 parking spaces are indicated by signage on the northern boundary wall



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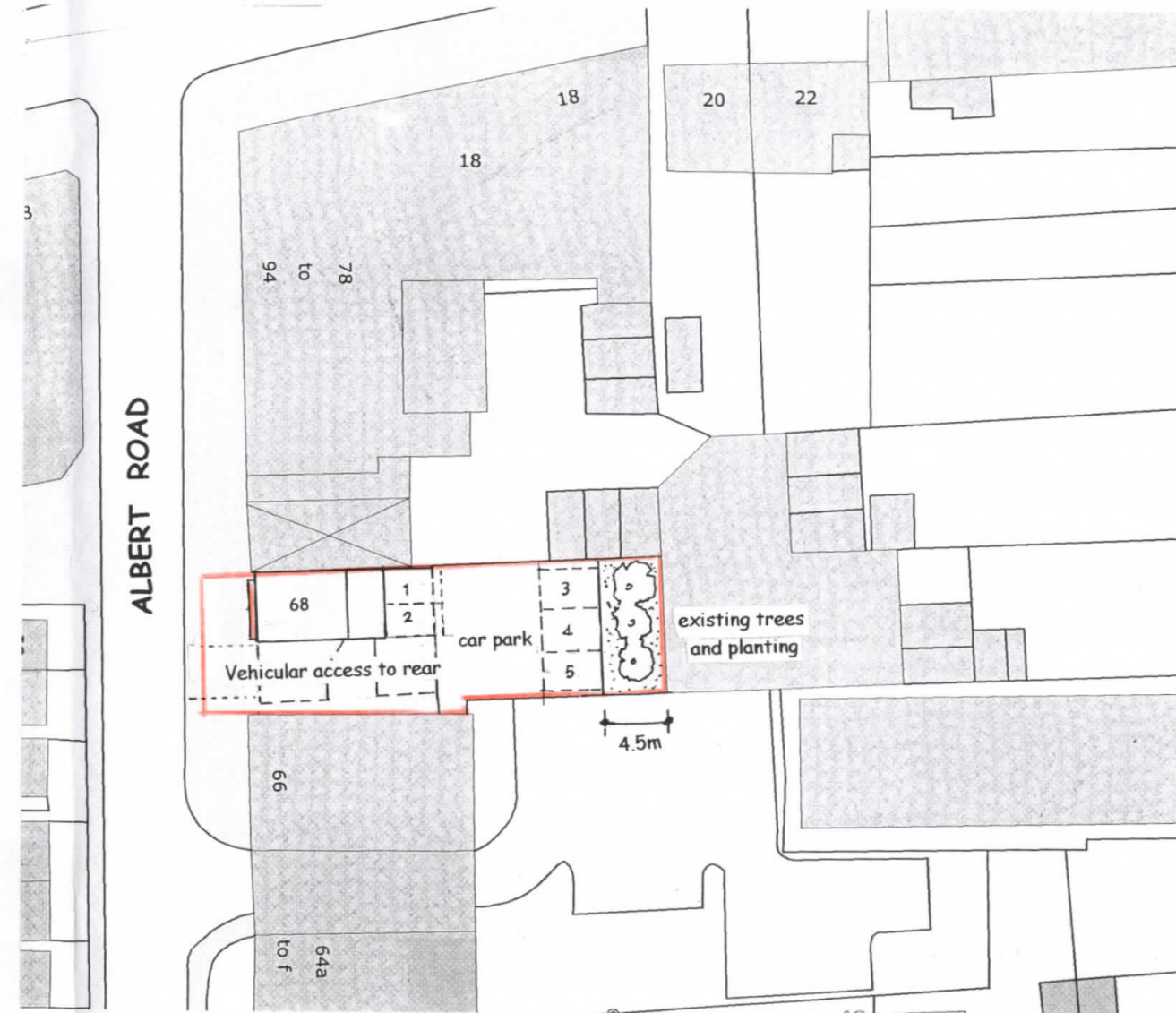
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APPENDIX 3



LOCATION 1/1250 scale



SITE PLAN 1:500 scale

LONDON BOROUGH OF
HILLINGDON
RECEIVED
18 FEB 2009
PLANNING & COMMUNITY
SERVICES

Pencil Poised Ltd.

Architectural and Surveying Services

Email pencilpoised@surveyor.orangehome.co.uk

Mobile 07968 979 259

PROPOSED CONVERSION OF EXISTING
GROUND FLOOR OFFICE TO STUDIO FLAT
AT 68 ALBERT ROAD, VIEWSLEY, UB7 8TS

SITE AND LOCATION PLANS - NEW BAY ADDED AT FRONT

Date	06 / 2008
Scale	1 / 50
DRG. NO.	1