

34 Wellington Road
Northfield
Ealing
W5 4UH

12th May 2010

Adam Hill
Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

Dear Mr Hill,

Cranmer Avenue Snooker Centre Planning Appeal – Ref: 2125636

I write to you as Case Officer on behalf of Ealing Fields Residents' Association (EFRA) in respect of the above planning appeal.

EFRA is a large association with a membership of some 500 residents in the Little Ealing area. Cranmer Avenue lies within our membership catchment area and we therefore appreciate the opportunity to comment on this application.

We welcome the principle of redeveloping this site for residential use, which would be consistent with the redevelopment of the former electrical works on the site of the adjoining Windings Place and the usage of the other buildings in Cranmer Avenue.

We do however have a number of concerns about this application, which are set out below.

1 NATURE OF CRANMER AVENUE

The Council's planning guidelines set out urban design criteria which state:

*“Appropriate **Height and Scale**, which should be in scale with adjoining buildings. Buildings should relate well to those it adjoins as well as the overall street scene.” (UDP Table 4 A ii)*

*“**High Quality Architecture** should reflect the local character in townscape and/or landscape terms by responding to and reinforcing locally distinctive patterns of development.” (UDP Table 4 A iii)*

We therefore believe that any development on the snooker hall site should reflect the character of Cranmer Avenue. In particular we draw your attention to the following matters.

1.1 Residential Nature of Cranmer Avenue

With the exception of the snooker hall, all the buildings in Cranmer Avenue are low rise terraced Edwardian housing. The recently constructed Windings Place emulates the design of the existing housing. The character of the street is enhanced by the retention of the entirety of its original housing.

It should be noted that the townscape of Cranmer Avenue is different from that of Northfield Avenue. The former is a residential side street, while the latter is both a local shopping centre and a major through transport route. The differing types of buildings reflect these different uses. In Northfield Avenue they are predominantly retail or mixed use with residential flats on the upper storeys. There is no retail presence in Cranmer Avenue.

We therefore believe that it would be inappropriate to rely on the precedent of the design of buildings in Northfield Avenue to justify the overdevelopment of a site in Cranmer Avenue.

1.2 Building Line and Setbacks

The building line of the Edwardian residential properties in Cranmer Avenue is set back from the pavements and behind sizeable front gardens.

There is an even greater setback at Windings Place where space has been created for off-street parking.

The historic building line contributes much to the character of Cranmer Avenue and the quality of life enjoyed by its residents.

As the setback of dwellings from the street is a key consideration in defining the character of a street and in determining the degree of privacy given to ground floor rooms, we consider the provision of an adequate setback is essential for the proposed development on the snooker hall site.

1.3 Location of existing Ridge Lines

The ridge lines, which represent the maximum height of the existing houses, are located at the centre of the buildings. None of the houses have their maximum height at the front of the building.

1.4 Front Roofs

The absence of dormers/apexes in the front roofs of the Edwardian houses, and those at the relatively recently constructed Windings Place, contributes to the 'open' character and townscape of Cranmer Avenue.

This is enhanced by the gentle pitch of the front roofs of all the housing in the street.

2 PRECEDENT PROVIDED BY WINDINGS PLACE

The three residential properties adjoining the appeal site were constructed on the site of a former electrical works. The name of Windings Place acknowledges this former use.

Windings Place Building line set further back than the Edwardian housing



Source: Planning Application Statement, page 5

We believe that a number of the features of the Windings Place development provide a valuable example of the type of residential development which can be constructed on small non-residential sites, and which also complies with the Council's planning guidelines.

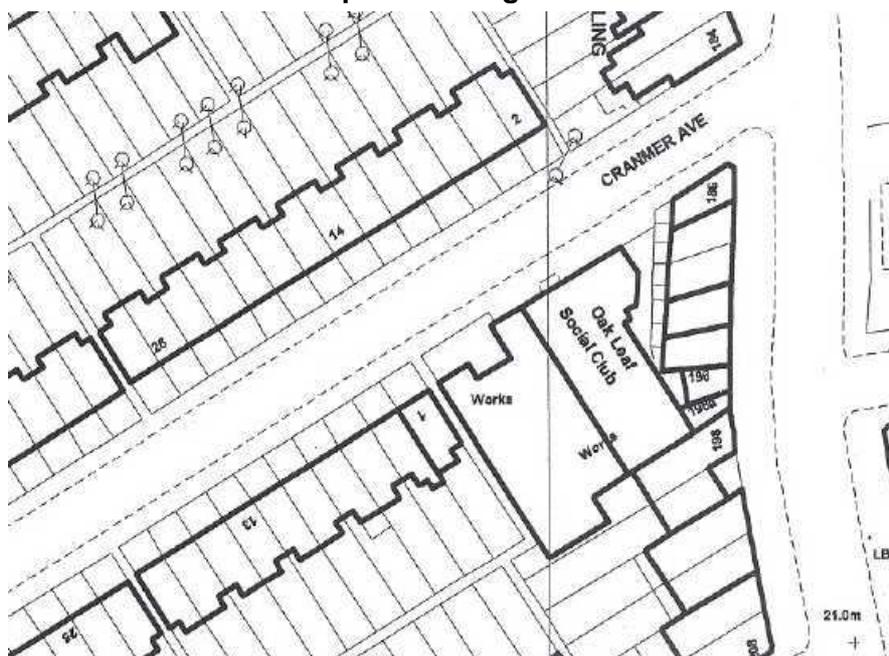
In particular, we wish to draw your attention to the following features which should inform the redevelopment of the snooker hall site:

- Adopting a design which echoes that of the neighbouring Edwardian housing,
- Lowering of the roof ridge below that of the neighbouring housing,
- Retaining the roof ridge at the centre of the property, rather than moving the highest point forward to the pavement edge,
- Adopting a roof pitch at the front of the buildings which replicates that of the Edwardian terraced housing in the road,
- The absence of dormers in the front roof,
- Setting back the building line from that of the former building,
- Provision of a rear garden for each property,
- Provision of off-street parking.

The following map shows the footprint of the electrical works which used to occupy the Windings Place site.

When compared to the above photograph, it will be noted that the former works used to project forward of the replacement housing.

1999 Map of Windings Place Site



Source: 1:1250 Maps 240 (TQ 1679 SE) and 241 (TQ 1779 SW)
in the Local History Collection at Ealing Central Reference Library.

The building on the eastern portion of the works site used to project as far forward as the front of the snooker hall, while the building on the western end of the works site projected forward to the line of the front of the neighbouring Edwardian house.

As can be seen from the above photograph, the building line of the replacement residential property was moved back to behind that of the Edwardian housing.

In the case of 1 Windings Place, at the eastern end of the site, this represented a major claw back of the front of the building from a position alongside the front of the snooker hall to the current position.

3 EXTERNAL DESIGN CONCERNS

3.1 Building Line

The developer is proposing to build forward to, and beyond, the building line of the snooker hall. We believe that the redevelopment to residential uses should respect the building line of the existing and long established residential properties along the south side of Cranmer Avenue and therefore be in keeping with the residential character of this street.

We therefore ask that the developer should be required to rework the application so that it reflects the building line of the houses along the south side of Cranmer Avenue.

3.2 Increase in Height

We are concerned that the proposed building will be materially taller than the existing snooker hall.

The following extracts from the Design and Access Statement give some indication of this increase.



3.3 Window Bays Projecting forward of existing building line

We draw your attention to the footprint of the proposed window bays facing Cranmer Avenue. Please see the extracts from the Design and Access Statement in section 3.4 below.

A comparison of the existing and proposed ground floor plans contained in the Design and Access Statement shows that the window bays will project forward onto the paved area in front of the current building.

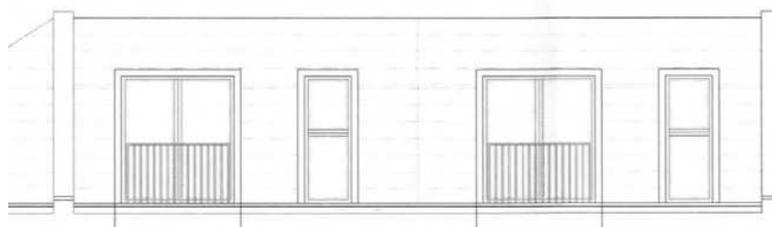
A review of the proposed elevations and upper floor plans show these bays rising upwards to the level of the eaves of the second floor mansard. The nature of these bays is substantial and cannot be compared to the visual impact of a ground floor entrance porch.

We regard the construction of these projecting bays as unacceptable.

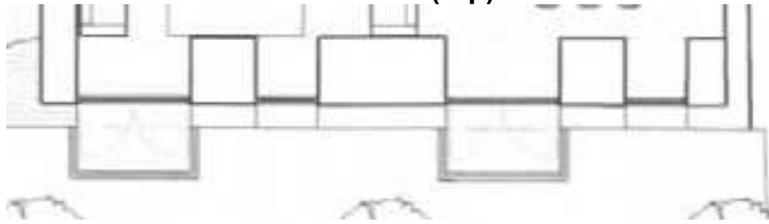
3.4 Balconies

We draw your attention to the proposal to construct balconies in the steep mansard storey facing Cranmer Avenue. Extracts from the Design and Access Statement are shown below.

Front Elevation



Plan of Second (top) Floor



This proposal appears to be in breach of UDP Table 5C,3 which states,

“Roof terraces and balconies will not be permitted where they overlook neighbouring habitable rooms or garden space.”

It also appears to be in breach of the following statement on page 20 of SPD 4, which states:

“Balconies associated with roof extensions and dormer windows are not encouraged, due to the potential for overlooking neighbouring properties and because of their visual impact.”

For these reasons we believe that the inclusion of balconies should be refused.

3.5 Side Elevation

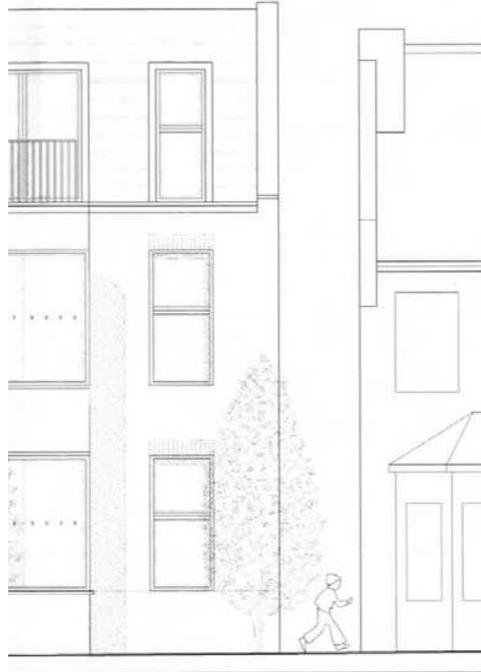
The gently sloping, west facing, roof of the projecting portion of the snooker hall serves to minimise the visual dominance of this structure.



The height of the western side wall of the replacement three storey building will be approximately double that of the white side wall of the snooker hall. It will therefore visually dominate the whole street, in addition to overshadowing the front of Windings Place.

The front elevation and plans of the replacement building show that its Western edge will rise vertically for three storeys.

**Front Elevation of Western Side of Proposed Building,
Showing vertical boundary wall facing Windings Place**



Source: Design and Access Statement

Floor Plans of Western Side of Proposed Building,

Ground Floor	First Floor	Second Floor No mansard slope along eastern side of building

According to the plans, the inward slope of the mansard will be minimal and will only exist at the front of the building and therefore fail to minimise the bulk of the proposed building when viewed from the west. Along its western side the building will rise vertically to the roof.

3.6 Overshadowing

The extent of the potential overshadowing can also be seen by examining the existing front elevation. The following extract shows that the ridge of the snooker hall gable end is approximately at the same height as the eaves of the Edwardian 1 Cranmer Avenue. The vertical side wall of the snooker hall aligns with the first floor window sills of 1 Cranmer Avenue.

It should be noted that the second taller gable end, shown above that of the snooker hall, is the side profile of a house facing Northfield Avenue. This house is located behind the snooker hall and appears to have no relevance to the Cranmer Avenue frontage.

Existing Elevation



3.7 Existing Roof Frontages

In paragraph 1.0.3 of the introduction to their Design and Access Statement the developer states, “*The predominant heights of buildings in the area is two storeys with many addition (sic) loft conversions with dormer and mansard windows.*” This statement needs clarification.

We draw your attention to the frontages of the existing residential housing in Cranmer Avenue and the inconsistency between the design of the proposed mansard level of the development and the roof frontages of the neighbouring housing.

As can be seen from the planning application’s aerial and street photographs of Cranmer Avenue, none of the existing terraced housing contains gables or apexes to their front roofs. While the roof space of some houses may have been converted to provide additional accommodation, the only external evidence of this on their street frontages is the insertion of Velux windows flush with the pitch of the pre-existing roof.

We would also draw your attention to the inconsistency between the near vertical pitch of the front mansard of the proposed development, with the gentle pitch of the front roofs of the other properties in Cranmer Avenue.

It is our view that the design of the roof frontage of the proposed development should reflect and emulate the roof frontages of the pre-existing residential properties in Cranmer Avenue.

3.8 Upper Floor Massing

The Schedule of Gross External Areas in section 5 of the Design and Access Statement evidences an excessive increase in the floorspace of the upper stories.

The first floor increases by 64sqm from 136sqm to 200sqm, and a new second floor of 142sqm is added. This will result in a combined increase to the upper levels of 206sqm on a small plot and in our view is evidence of over-development.

3.9 Height of Cranmer Avenue Pavement Frontage

The drawings and elevations contained in the Design and Access Statement propose a substantial increase in the height of the frontage facing Cranmer Avenue.

At present the frontage is mainly single storey in height with the peak of the gable end of the former snooker hall rising to the equivalent of the first floor level of the surrounding properties. The east and west facing aspects of the pitch roof of this gable end do much to reduce its visual intrusion on the street.

The proposals include the addition of a first floor level across the whole width of the site and also add a near vertical mansard fronted second floor above that. The height of the proposed second floor mansard appears to exceed that of the roof ridge of the neighbouring Windings Place terrace.

Any comparison of the height of the proposed development with the height of the roof ridges of the terraced housing in Cranmer Avenue needs to be contextualised by the relative distance of the highest point of the respective buildings from the front of the properties.

The existing housing is set well back from the pavement with the roof ridges located along the centre of the properties and running parallel to the street. In contrast, the maximum height of the proposed development will be along its pavement frontage and will therefore exacerbate its overbearing nature and negative impact on this two storey residential street.

3.10 Set Back of First Floor Rear

We note the proposal to set back the first floor rear of the building, as described on pages 22 and 23 of the Planning Application Statement. Paragraph 1.2.3 of the Key Design Changes section of the Design and Access Statement states, *"The first floor roof area created for the setback is for maintenance access only, to prevent overlooking issues."*

We suggest that this restriction is recorded as a planning condition, and required to be included in the leases of the first floor flats.

3.11 Forecourt Design

The Design and Access statement fails to address the treatment of the pavement area in front of the two ground floor flats. Page 4 of the Planning Application Statement shows a car parked in this location.

We therefore suggest that the developer be required to hard landscape this area, with the inclusion of brick planters, in order to prevent off-road parking and to protect the privacy of the residents of the ground floor flats.

**Extract from Planning Application Statement
Example of Forecourt/Pavement Parking**



3.12 Garden Space

Only two of the 5 or 6 flats will have access to their own garden space. This is in contrast to the Windings Place redevelopment, where every dwelling was provided with its own garden.

A community garden has not been included in the design.

We note the requirements for garden space which are set out in UDP policy 5.5 and SPG 13 and believe that they should be enforced in the case of this application.

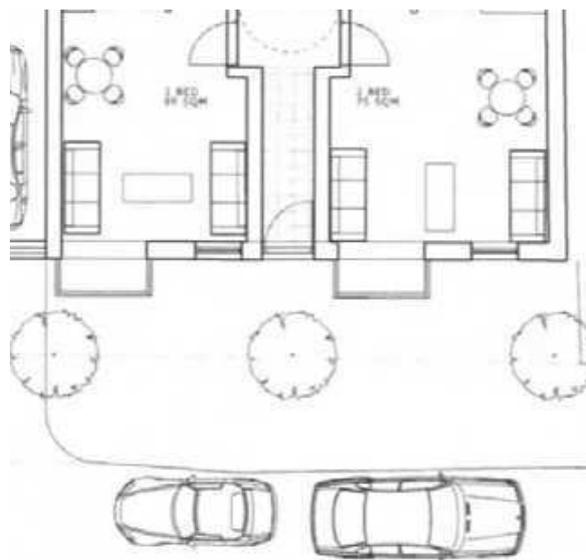
4 INTERNAL DESIGN CONCERNS

4.1 Proximity of Habitable Rooms to Pavement

We are concerned that the only windows of the living rooms of the two ground floor flats will directly adjoin the pavement.

We believe that this will result in an unacceptable loss of privacy for the occupants of these two flats.

Extract from Design and Access Statement



4.2 Second Floor Layout

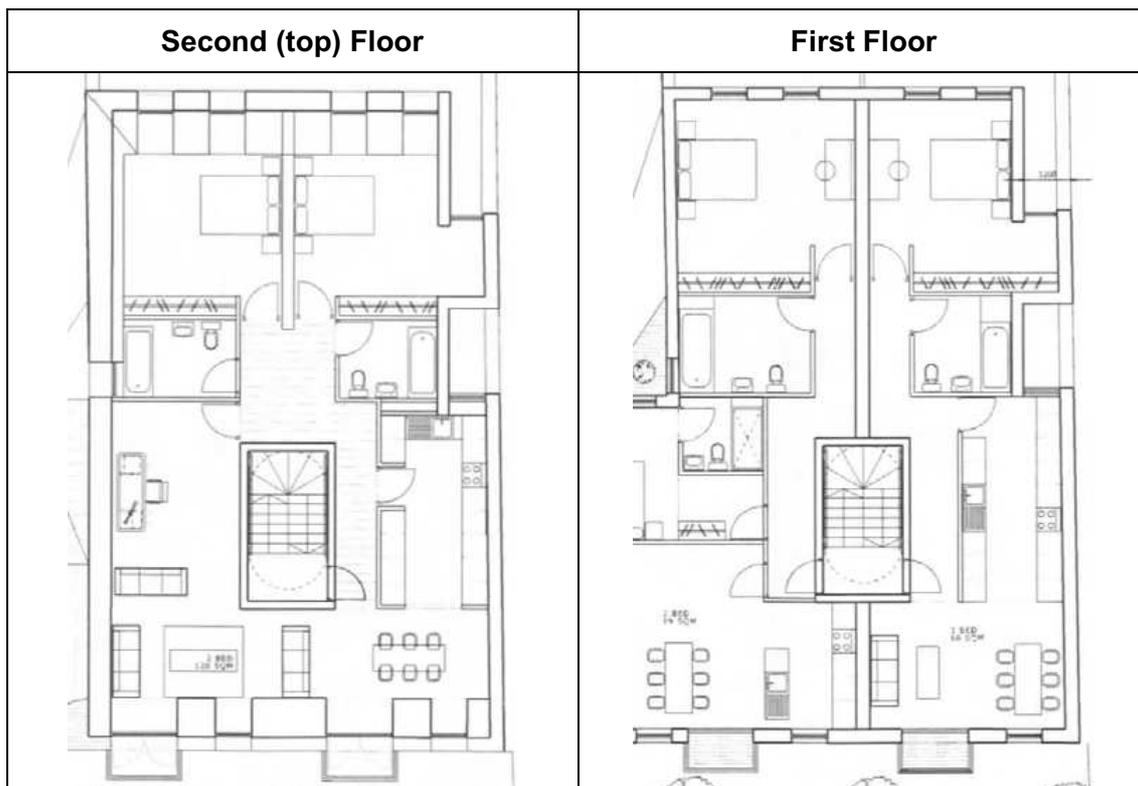
We note that the developer states in paragraph 1.2.1 of the Key Design Changes section of the Design and Access Statement that the number of units has been reduced from 6 to 5.

We would draw your attention to paragraph 1.0.1 of the Design and Access Statement which states, “*containing 6 purpose built apartments.*” and paragraph 5.7 of the Planning Application Statement which refers to 6 units. There appears to be some inconsistency in the developer’s mind as to their desired number of apartments.

We are particularly concerned at the symmetrical internal layout of the proposed second floor and the ease with which it could be converted to two single bedroom flats. The layout of the first floor single bedroom flat, on the eastern side of the proposed building, is virtually identical to either side of the proposed second floor. Extracts from the Design and Access Statement which demonstrate this coincidence are shown below.

We therefore request that if the current version of the application was to be approved, it should be accompanied by a planning condition that would prevent any future reconfiguration of the second floor, and that the condition should be incorporated into the lease for the second floor flat.

Floor Plans



Source: Design and Access Statement

4.3 On-Site Parking

We note that only two internal parking places are proposed within this development of 5 or 6 flats. This contrasts with the provision of one off-road parking space for every residence in the adjoining Windings Place development.

We recommend that at least one of the internal parking spaces should be reserved for disabled drivers and be designed with a footprint that complies with the Council's planning requirements.

4.4 Access Issues

Reference is made to access issues in the Design and Access Statement. There is extensive reference to access requirements in the UDP Chapter 4, please see Table 4Avi (page 56) and Policy 4.3 (pages 58-59). Detailed guidance is also given in Part 2 of SPG 7 'Accessible Ealing'.

We have a number of concerns over the following access issues:

- The width of the main entrance appears narrow, especially as there doesn't appear to be a recess to accommodate the front door when it is open. Wheel chairs and electric buggies need wide entrances, especially if the occupant is being accompanied by a carer,
- It is unclear if the entrances and doorways to the ground floor flats will be able to accommodate an electric buggy,

- Paragraph 6.1.2 of the Access and Design Statement states that, *“This stair could have a stair lift fitted for future disabled access if required.”* We are uncertain about the planning and building regulations requirements regarding the installation of stair lifts in shared common parts stairwells and would ask that the dimensions of the stairwells will fully accommodate this potential future enhancement.

4.5 Postal Arrangements

The application alludes to, but does not clarify, the arrangements for postal deliveries. Royal Mail tends to insist on external letterboxes in new developments.

One option adopted in some developments is to locate private letter boxes alongside the entrance, so that residents can empty their personal letterbox from within the building.

The current ground floor plans and front elevations fail to identify an exterior wall on which the letterboxes could be located, regardless as to how the residents would access them.

We suggest that these arrangements are clarified prior to the granting of planning approval.

4.6 Refuse Arrangements

These do not appear to have been adequately worked out. The implication is that the residents of the upper floor flats will circumnavigate the perimeter of the development in order to transfer their rubbish and recycling to the storage area at the rear of the garage. Someone, presumably, will then transfer the rubbish and recycling for the whole block to the pavement area prior to the Council’s collection cycle.

There appears to be a degree of optimism about these arrangements which needs further thought.

5 IMPACT ON NEIGHBOURS

5.1 Height, Scale and Massing

We believe that the height, scale and massing of the proposed development will result in unacceptable overbearing of the low rise neighbouring properties. This would adversely impact on the living conditions of the surrounding residents and would be detrimental to their residential amenity.

Particular concerns include:

- The overlooking of habitable rooms of the houses opposite,
- The shading of winter sunlight from the houses opposite and numbers 1-3 Windings Place,
- The overbearing impact of the three storey side wall on the residents of the setback Windings Place,

- The overbearing impact of a three storey building at the pavement edge on all the residents of Cranmer Avenue. The Northfield Avenue end of Cranmer Avenue leads to the local shops, amenities and transport facilities. It is primary access and exit route for all the residents of the Avenue. All of whom will have to pass the proposed development.

5.2 Parking Pressures

We note that paragraphs 5.4 to 5.8 of the Planning Application Statement indicate the applicant's willingness to accept a planning condition that would prevent the occupants of the flats from applying for CPZ parking permits.

In paragraph 5.24 of the Planning Application Statement the applicant states, *"the nature of the flats proposed which are unlikely to be inhabited as family dwellings."*

This suggests that the flats are likely to attract adult occupants and therefore potential car users. The number of proposed bedrooms could result in a locally significant increase in vehicle ownership. For this reason we recommend the adoption of a planning condition preventing CPZ parking.

6 CONCLUSION,

While welcoming the proposed residential use of this site, we believe the bulk, mass and height of the proposed building is excessive and therefore unacceptable.

We are also concerned by the pressures, including parking pressures, that the relatively large number of occupants of the proposed building will place on this residential street.

In addition, there are a number of other issues that are indicative of an inadequately thought out proposal.

For the above reasons we ask the planning Inspector to reject this appeal.

We also request that we be sent a copy of the Inspector's report.

Yours sincerely,

James Guest
EFRA Committee Member with responsibility for Planning and Licensing Issues