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Northfield  
Ealing  
W5 4UH

5<sup>th</sup> January 2014

Emma Lewis  
Planning Services  
Ealing Council  
Perceval House  
14-16 Uxbridge Road  
Ealing  
London W5 2HL

Dear Ms Lewis,

**Cranmer Avenue Snooker Centre, Northfields, W13 9SH**  
**Planning Application – P/2013/4995**

I write on behalf of Ealing Fields Residents' Association (EFRA) in respect of the above planning application.

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

While welcoming an exclusively residential development, we have a number of concerns over key elements of the proposal which we set out below.

It is our opinion, after considering the drawings, Design & Access Statement and the Planning Statement that this application should be refused.

**1 LOCAL CHARACTER**

The proposal fails to respect the local character of Cranmer Avenue, and its neighbouring residential side streets. It therefore fails to comply with London Plan Policy 7.4.B and Local Variation 7.4.D contained in Ealing's Development Management DPD.

In her report of September 2010, the Planning Inspector stated:

*“Cranmer Avenue is characterised by terraced dwellings with fair-sized back gardens and modest gardens or paving at the front. Due to the space between the dwellings on each side of the road, **their scale**, and the trees in the street, the road has a **suburban character with good levels of privacy, including in the rooms at the front of the dwellings.**”* (paragraph 4)

We also draw your attention to the statements in paragraphs **7, 10** and **22** of the Inspector's report.

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, Cranmer Avenue comprises low rise terraced Edwardian housing with a recent development at Windings Place which closely emulates the design of the neighbouring Edwardian housing.

The character of the street as a whole is enhanced by the retention of the entirety of its original Edwardian housing and the sympathetic design of the recent infill at Windings Place.

It should be noted that the townscape of Cranmer Avenue is different from that of Northfield Avenue. The former is a quiet 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. The buildings in Northfield Avenue do not and should not set a precedent for developments 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, for the neighbourhood, sizeable front gardens. There are no constructions forward of the Edwardian building line.

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 open aspect, neighbourhood 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 and would respect the expectations set out in the London Plan, and its SPG's, that the home should be a "place of retreat".

### **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 above pitched roofs. None of the houses have their maximum height at the front of the building.

### **1.4 Front Roofs**

There is a marked absence of dormers/apexes in the front roofs of the Edwardian houses, even though the front roofs are set back from the pavement by the intervening front gardens. This is evidenced in the aerial photographs on pages PDF 8 and 9 of the applicant's Design and Access Statement.

The omission of front dormers/apexes was emulated in the design of the redevelopment housing on the adjoining Windings Place site.

The absence of front dormers/apexes contributes much to the 'open' character and suburban character of Cranmer Avenue that was noted by the Planning Inspector.

### **1.5 London Plan Policy Guidance**

The following guidance in the London Plan would seem to be particularly relevant:

*"The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children and older people." (Policy 3.5.B)*

*"Buildings, streets and open spaces should provide a high quality design response that." (Policy 7.4.B)*

*"has regard to the pattern and grain of existing spaces and streets in orientation, scale, proportion and mass." (Policy 7.4.B.a)*

*"is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings." (Policy 7.4.B.c)*

*"allows existing buildings and structures that make a positive contribution to the character of place to influence the future character of the area." (Policy 7.4.B.d)*

### **1.6 Local Development Management Policy Guidance**

We draw your attention to the following recently adopted Development Management guidance which accompanies the policies for considering planning applications contained in Ealing's Local Variation 7.4.D:

*"Many of Ealing's built areas exhibit a strong or high-value visual character, and this should be respected and strengthened with particular reference to the elements of local character set out in this policy." (paragraph E7.4.1)*

*"Street sequence is the spacing and massing of buildings in relation to the street. The sequence of existing street frontages is often regular or deliberately formed and this may be essential to the character of an area." (paragraph E7.4.4)*

*"Scale is more than mass or height and relates particularly to the treatment of these attributes within the design as a whole. Different areas of Ealing are characterised by differing and distinctive treatments of building scale and development proposals should demonstrate how they respond to the scale of their surroundings." (paragraph E 7.4.4)*

We also draw your attention to the following guidance accompanying Ealing's Local Policy 7B – Design Amenity:

*"Many of Ealing's built areas exhibit a strong or high-value visual character, and where this is the case this should be respected and strengthened." (paragraph E7.B.1)*

Ealing's Development Management DPD Local Variation Policy 3.4.B defines the area as Suburban for density purposes.

It is our opinion that the proposed development fails to respect the intact residential character of the now 100 year old Cranmer Avenue, and would therefore be in conflict with London Plan Policies 7.4, 7.1, 7.6, 3.5 and therefore 3.4.

## **2 PRECEDENT PROVIDED BY WINDINGS PLACE**

The three residential properties immediately 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 of new development set back to that of the Edwardian housing with forecourt space for off-road parking**



Source: P/2011/4688 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 brownfield sites, and which also complies with the Council's planning guidelines.

We draw your attention to the following statement in the Planning Inspector's September 2010 report:

*“. . . the proposal before me has failed to take the opportunity to improve the character and quality of the local area. I say this in the light of the Council's approval of 1 to 3 Windings Place which harmonises with the street scene in Cranmer Avenue, and which has similarly replaced a building which had covered most of the site next door.”*  
(paragraph 10)

We believe that these criticisms also apply to the current application and in particular the forward massing on its Cranmer Avenue frontage of the proposed development at its first and second floor levels.

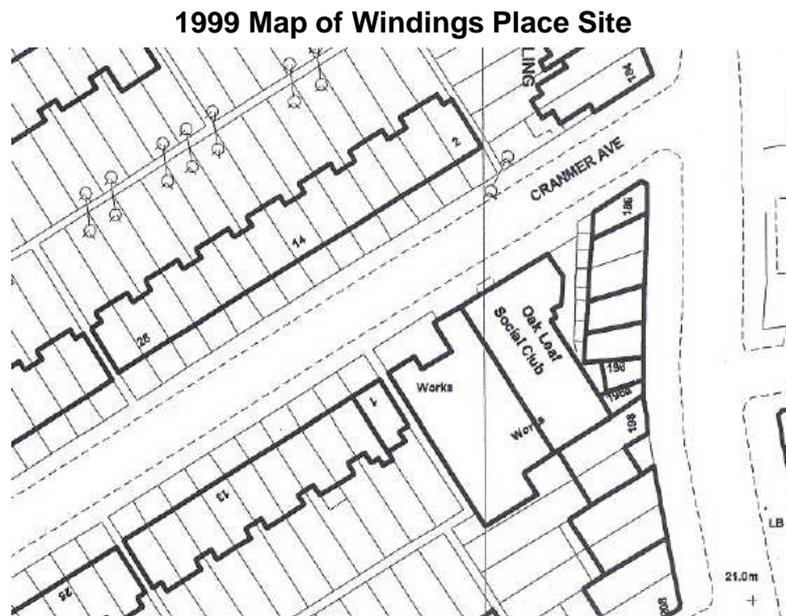
In particular, we wish to draw your attention to the following features of 1 to 3 Windings Place which should inform the redevelopment of the snooker hall site:

- 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 so that it conforms to that of the other houses in Cranmer Avenue,
- 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.



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 Windings Place 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 neighbouring 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 PRECEDENT OF RECENT PLANNING APPLICATIONS**

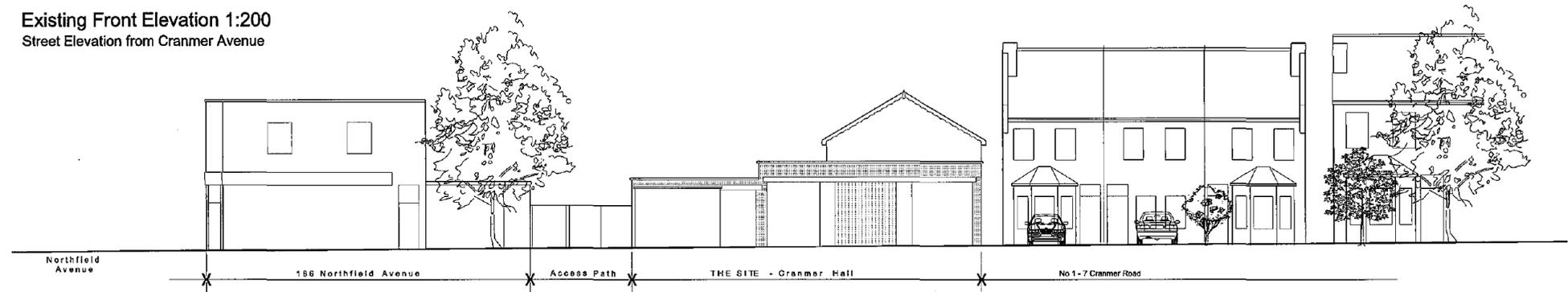
Another development we would draw your attention to is the redevelopment of the Nodis Works in the residential side street of Julien Road, application P/2012/1135. In this case an employment site with buildings at the pavement edge will be replaced by houses which will be set back from the pavement edge.

A copy of the Design and Access Statement for this application with photos of the existing works buildings and illustrations of the proposed houses is attached. It will be noted from the illustration on page 12 of the DAS, that this developer has also gone to considerable effort with the design of the proposed houses in order to ensure that they will make a positive contribution to the character of Julien Road.

# CRANMER AVENUE SNOOKER HALL SITE

## 4 BUILDING HEIGHTS AND ELEVATIONS OF APPLICATION SITE AND ADJOINING PROPERTIES

Existing Front Elevation 1:200  
Street Elevation from Cranmer Avenue



Source: P/2011/4688 Design & Access Statement – Section 4  
See Also : Elevation on PDF page 18 of P/2013/4995 Design & Access Statement for a redrawn version of this elevation

It will be noted from the above elevation that the majority of the Snooker Hall site frontage is single storey in height.

The eastern side of the site is exclusively single storey for its whole depth. This is where the applicant is proposing to construct a two storey garage / “stable block” forward of Cranmer Avenue’s established building line.

There is a limited first storey under a shallow ridge roof along the western side of the site. The axis of this ridge roof means that the visual impact of the side of this building is moderated by the sloping roof which faces westward down Cranmer Avenue.

The eave of the western side of the ridge roof is aligned with the bottom of the first floor side window of 1 Windings Place.

It should also be noted that the building at the corner of Cranmer Avenue with Northfield Avenue is only two storeys high under a flat roof, the edge of which aligns with the eaves of houses at Windings Place and along the south side of Cranmer Avenue. The height of this corner building is materially lower than the roof ridges of the houses in Cranmer Avenue.

## CRANMER AVENUE SNOOKER HALL SITE

### 5 RELATIONSHIP OF APPLICATION SITE TO NEIGHBOURING RESIDENTIAL PROPERTIES

The front elevation of the Snooker Hall faces four residential houses, namely 2, 4, 6 & 10 Cranmer Avenue.

At present there are no windows on the front of the Snooker Hall, which means that there is no overlooking of the opposite properties.

Elsewhere in Cranmer Avenue the houses are set back behind front gardens approximately 4 metres in length, or in the case of Windings Place behind car parking spaces.

This means that there is an established distance in Cranmer Avenue between the front rooms of the houses on either side of this road.

It is proposed to locate the front of the proposed two storey garage / “coach house” close to the pavement edge, rather than setting it back to the established Edwardian building line along the south side of Cranmer Avenue.

The proposal in the application to install full height first floor windows with Juliet balconies above the proposed garage will result in both:

- unacceptable overlooking of 2 & 4 Cranmer Avenue on the opposite side of the road, and
- be out of character with this hundred year old residential side street, where every other house has a significant separation space between the pavement and the building line.

We suggest that this overlooking would be in conflict with the guidance contained in Ealing’s Local Development Management Policy 7B and its accompanying guidance.



Source: P/2011/4688 Design & Access Statement

See Also : Map on PDF page 9 of P/2013/4995 Design & Access Statement for a redrawn version of this map

## **6 JULIET BALCONIES**

It is not appropriate to position full height windows with Juliet balconies on the first floor close to the pavement edge. These windows will be positioned some three metres forward of the Cranmer Avenue building line and five metres forward of the front of Winding Place.

As shown in the drawing above, there is only a ground floor entrance porch to the existing snooker hall at the point where the developer is proposing to add a first storey and install full height windows with Juliet balconies.

The owners of the other houses in Cranmer Avenue would not be permitted to construct a first floor extension in front of their houses close to the pavement edge, and most certainly would not be allowed to install full height first floor windows close to the pavement edge.

We therefore ask that further consideration is given to the configuration of the first floor front flat above the garage including its projection forward of the Cranmer Avenue building line and the deletion of the proposed full height windows and Juliet balconies.

## **7 SIDE WINDOW 1 WINDINGS PLACE**

We draw your attention to the side window at 1 Windings Place which faces onto and above the sloping roof of the existing snooker hall building. The window is located at first floor level directly below the roof ridge line of 1 Windings Place. There is a photograph of this window on page 20 of the Planning Statement.

We suggest that the narrative in the Planning Statement lacks clarity and fails to indicate that the first floor side wall of the proposed development will be constructed directly in front of this window.

The first floor plans indicate that the development's first floor side wall will be constructed on the site boundary at this point, and not set back in order to provide light to the side window of 1 Winding's Place.

We suggest that this would be detrimental to the amenity of the residents of 1 Windings Place and therefore unacceptable.

## **8 FRONT SIDE ELEVATION FACING 1 WINDINGS PLACE**

We are concerned by the visual impact of the projecting front side elevation facing 1 Windings Place. We note from the Proposed Elevation Side South-West Façade drawing that the vertical side wall of the proposed building will project forward of the Cranmer Avenue building line and will be noticeably taller than the eaves of the pitched roof of the existing building on the site.

We suggest that this would be unacceptably prominent when looking eastwards down Cranmer Avenue and would also fail to address the following concerns expressed by the Inspector in her 2010 report on an earlier scheme.

*“Because of its 3-storey scale, its form and its siting, the proposed building would have an overbearing and oppressive visual impact on the occupiers of 1 Windings Place, at the front of their home, which would harm their living conditions.”*  
(paragraph 25)

## **9 OUTDOOR AMENITY SPACE**

While welcoming the provision of a rear garden for the use of the residents of the ground floor flat, we are concerned at the reliance on rear balconies for the rear first floor and the second floor flats.

We are uncertain that the residents of Cranmer Avenue would be permitted to construct similar first or second floor balconies screen by obscured glazing on the rear of their homes above rear extensions.

We are particularly concerned at the proposal on the annotated elevation drawing for the South-East Façade that the south facing obscured glazing of the second floor balcony will only be 1100mm high above floor level. This would provide unacceptable overlooking of the first floor balcony, the rear garden of the ground floor flat and part of the garden of 1 Windings Place.

In the event that the proposed rear balconies are approved we suggest that the planning decision is conditioned to prevent the removal or alteration of the obscured glass screens and that residents are prohibited from accessing those areas of the roofs which are located outside the balconies. We note the reference to a possible condition in paragraph 20 of the 2010 Inspector's report.

We suggest that the absence of outdoor amenity space for one of the first floor flats is both unacceptable and is in conflict with the guidance contained in Ealing's Development Management DPD. We also draw your attention to the following comments contained in the 2010 Inspector's report which addresses a similar lack of provision in an earlier application.

*“. . . there would be little space on the site that would be well related to the flats on the upper floors for items such as washing lines, or space to sit outside in the sunshine. And, for the 2-bedroom first and second floor flats, if they were to be occupied by families, there would be no space for children to play outdoors close at hand. The deficiency of useable outside space for the first and second floor flats would be unacceptable having regard to the character of the locality, and it would seem to me to be a direct consequence of the excessive number of residential units proposed.”* (paragraph 18)

It should be noted that it would be possible to include outdoor amenity space on the site if a different footprint was adopted by the developer. For example, the main part of the site broadly equates to that occupied by 2 & 3 Windings place, both of which have private rear gardens.

A further point is that Lammas Park does not provide space for residents to hang out their washing or enable parents to supervise their children in a secure garden while carrying out housework or working from home. Lammas Park is not an adequate alternative for the provision specified in both the London Plan and Ealing's SPG13.

## **10 QUALITY AND DESIGN OF HOUSING DEVELOPMENTS**

We note that Ealing's local variation to London Plan Policy 3.5 introduces expectations that developments should comply with the London Housing SPG and provide minimum ceiling height.

We draw your attention to the following provisions in the London Housing SPG and their accompanying guidance notes:

**Dual Aspect** – Baseline Standard 5.2.1, and

**Privacy** – Baseline Standard 5.1.1.

We question that the inclusion of a bedroom window facing onto a closely overlooked service alley adequately meets the SPG's dual aspect expectations in respect of the north facing first floor front flat.

We are unable to locate a headroom clearance contour on the floor plan of the proposed second floor flat and are therefore unable to ascertain if it complies with the requirements and/or expectations set out in Ealing's Local Variation 3.5.G and its accompanying guidance notes, in particular E3.5.3.

## **11 PARKING**

We believe that the proposed two off-road parking spaces will provide insufficient provision for the occupants of the eight double bedrooms and therefore request that a legal agreement preventing residents from applying for CPZ parking rights is implemented, as proposed in paragraph 6.35 of the Planning Statement.

## **12 CONCLUSION**

For the reasons set out above we ask the planning authority to refuse this planning application.

We believe that our concerns stem from the applicant's proposals to over-develop a site that could accommodate, for example, a pair of semi-detached family houses and be compliant with all the relevant planning policies.

We ask to be kept informed on the progress of this application, and in particular ask that we are notified of any further revisions and/or amendments that are submitted.

Yours sincerely,

James Guest  
EFRA Committee Member with responsibility for Planning Matters

### **Attachment**

Julien Road Design & Access Statement