



Department for
Communities and
Local Government

Response Form

Extending permitted development rights for homeowners and businesses: Technical consultation

We are seeking your views to the following questions on the proposals to increase the permitted development rights for homeowners, businesses and installers of broadband infrastructure.

How to respond:

The closing date for responses is 5pm, 24 December 2012.

This response form is saved separately on the DCLG website.

Responses should be sent to: PlanningImprovements@communities.gsi.gov.uk

Written responses may be sent to:

Helen Marks

Permitted Development Rights – Consultation

Department for Communities and Local Government

1/J3, Eland House

Bressenden Place

London SW1E 5DU

About you

i) Your details:

Name:	James Guest
Position:	Committee member with responsibility for planning matters
Name of organisation (if applicable):	Ealing Fields Residents' Association (EFRA)
Address:	34 Wellington Road, Northfields, Ealing, London, W5 4UH
Email:	jg@jamesquest.plus.com
Telephone number:	020 8840 1173 & 0777 616 8285

ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response



Personal views



iii) Please tick the box which best describes you or your organisation:

District Council



Metropolitan district council



London borough council



Unitary authority



County council/county borough council



Parish/community council



Non-Departmental Public Body



Planner



Professional trade association



Land owner



Private developer/house builder



Developer association



Residents association



- Voluntary sector/charity
- Other

(please comment):	
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**iv) What is your main area of expertise or interest in this work?
(please tick one box)**

- Chief Executive
- Planner
- Developer
- Surveyor
- Member of professional or trade association
- Councillor
- Planning policy/implementation
- Environmental protection**
- Other

(please comment):	
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Would you be happy for us to contact you again in relation to this questionnaire?

- Yes No

ii) Questions

Please refer to the relevant parts of the consultation document for narrative relating to each question.

Question 1: Do you agree that in non-protected areas the maximum depth for single-storey rear extensions should be increased to 8m for detached houses, and 6m for any other type of house?

- Yes No

Comments

We believe that the proposals will result in a material loss of amenity to
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neighbours and the proposed 50 percent cap is significantly too permissive.

The loss of amenity will be particularly pronounced in Urban and Suburban locations where properties border irregular shaped plots, for example:

- Corner plots bordering regular shaped terraced or semi-detached housing, and
- Backland infill plots.

In both instances, the proposed 50 percent cap would allow the owners of the corner plots and of infill backland plots to extend further along their neighbour's boundaries than would be permitted in the case of the adjoining regular shaped plots.

Irregular shaped plots are particular features of the low-rise inter-war and immediately post war developments that incorporate crescents and cul-de-sacs

The following map extracts from our local area indicate the problem:

Chandos Avenue, W5

Irregular shaped corner plots



Julien Road, W5

Irregular shaped corner plots



Brentford immediately to north of A4/M4 - Irregular crescent and cul-de-sac plots



Question 2: Are there any changes which should be made to householder permitted development rights to make it easier to convert garages for the use of family members?

Yes No

Comments

We are located in an area where the construction of garages and outbuildings has been abused.

Substantial sums of taxpayers money, both council and Home Office, are now having to be spent by our council (Ealing), the Police, UK Border Agency and HMRC to eliminate the illegal activities which are taking place under the current planning framework.

Any relaxation in the planning rules will exacerbate the existing problems and illegalities associated with "beds in shed".

Question 3: Do you agree that in non-protected areas, shops and professional/financial services establishments should be able to extend their premises by up to 100m², provided that this does not increase the gross floor space of the original building by more than 50%?

Yes No

Comments

The proposed relaxation is not appropriate for residential neighbourhoods.

There is no shortage of retail and related accommodation in our local shopping parades.

Retail vacancies are increasing and there is an established trend by the owners of retail property to convert surplus premises, including their rear portions, to residential use.

The proposals would be detrimental to the amenity of the residents whose homes adjoin any properties that were allowed to expand in this way.

Question 4: Do you agree that in non-protected areas, shops and professional/financial services establishments should be able to build up to the boundary of the premises, except where the boundary is with a residential property, where a 2m gap should be left?

Yes No

Comments

The proposed relaxation is not appropriate for residential neighbourhoods.

There is no shortage of retail and related accommodation in our local shopping parades.

Retail vacancies are increasing and there is an established trend by the owners of retail property to convert surplus premises, including their rear portions, to residential use.

The proposals would be detrimental to the amenity of the residents whose homes adjoin any properties that were allowed to expand in this way.

Question 5: Do you agree that in non-protected areas, offices should be able to extend their premises by up to 100m², provided that this does not increase the gross floor space of the original building by more than 50%?

Yes No

Comments

The proposed relaxation is not appropriate for residential neighbourhoods.

There is no shortage of office space in our local shopping parades.

Retail vacancies are increasing and there is an established trend by the owners of retail property to convert surplus premises, including their rear portions, to residential use.

The proposal would be detrimental to the amenity of the residents whose homes adjoin any properties that were allowed to expand in this way.

Question 6: Do you agree that in non-protected areas, new industrial buildings of up to 200m² should be permitted within the curtilage of existing industrial buildings and warehouses, provided that this does not increase the gross floor space of the original building by more than 50%?

Yes No

Comments

Industrial uses in residential neighbourhoods place many pressures on the surrounding residents. These include noise and vehicle access.

It is therefore essential that any expansion of industrial buildings outside designated industrial locations set out in the Local Plan should be subject to the

local planning process.

Question 7: Do you agree these permitted development rights should be in place for a period of three years?

Yes No

Comments

We do not agree with these proposals and therefore do not agree with the proposed period for their operation.

Question 8: Do you agree that there should be a requirement to complete the development by the end of the three-year period, and notify the local planning authority on completion?

Yes No

Comments

In the unfortunate event that the proposals were approved for residential neighbourhoods, we believe that a tight time limit should be set for completions.

Question 9: Do you agree that article 1(5) land and Sites of Special Scientific Interest should be excluded from the changes to permitted development rights for homeowners, offices, shops, professional/financial services establishments and industrial premises?

Yes No

Comments

Question 10: Do you agree that the prior approval requirement for the installation, alteration or replacement of any fixed electronic communications equipment should be removed in relation to article 1(5) land for a period of five years?

Yes No

Comments

We believe that the current provisions are essential in order to prevent a proliferation of unsightly junction boxes on our streets.

The principle of coordinating the digging up of our roads and pavements is now accepted by the traditional services of water, gas and electricity.

The same principle of coordination, in this case via the local planning authority, should apply to telecommunications.

Do you have any comments on the assumptions and analysis set out in the consultation stage Impact Assessment? (See Annex 1)

Yes No

Comments

The Annex fails to adequately address the impact of the proposals on residential neighbourhoods with only local shopping parades and only small scale residual backland employment sites.

It is very easy to destabilise and destroy the character of a long established residential neighbourhood, especially where it is located outside a conservation area.

The Annex and accompanying notes should have included a comprehensive note of the potential adverse consequences of the proposals.

Thank you for your comments.