



Please reply to:
34 Wellington Road
Northfields
Ealing
W5 4UH

Paul Puddy
The Planning Inspectorate
3/10a Kite Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

13th April 2015

Dear Mr Puddy,

Planning Appeal 3004470 – Ealing Planning Application P/2014/2273

273 Northfield Avenue, Ealing, W5 4UH and in rear garden facing Wellington Road

**For the conversion of an existing family home into four self contained units and
the construction of two self contained units in the rear garden.**

The development to include two self contained basement units.

I write on behalf of our residents' association to object to the above planning application.

1 Introduction:

Ealing Fields Residents' Association (EFRA) is a large residents' association with a subscription membership of some 500 members across the more than thirty streets which are centred on Northfields station and Library.

The junction of Northfield Avenue with Wellington Road is located near the centre of our membership catchment area and this application is causing concern to a number of our members.

While EFRA wishes to support proportionate and appropriate development, we have a number of concerns over this application. These are set out below.

Our submission broadly follows the sequence of the reasons for refusal set out in the Council's Decision Notice, and also addresses points raised in the Appellant's Statement to the Planning Inspectorate.

The Inspector will note from paragraphs 1.3 and 3.11 to 3.13 of the Appellant's Statement that this application had been the subject of extensive pre-application discussions with senior Council planning officers, which culminated in an officer recommendation to approve the application.

Following their site visit, the application was unanimously rejected by the members of the Planning Committee at their meeting on 13th August 2014. The comments of members of the committee is attached as an appendix.

Given the ambiguous position which has been taken by planning officers over this application, we trust that the Inspector will understand the reasons for the somewhat comprehensive nature of this submission.

2 Application Site

The site is located in a residential neighbourhood and is currently occupied by a two storey end of terrace house with a loft conversion and its rear garden.

According to the application floorplans the existing bedroom accommodation consist of two double bedrooms on the first floor and a large double bedroom in the loft conversion on the second floor. This totals six bed spaces across the first and second floors, with through living rooms and kitchen on the ground floor. There is no basement.

The application is for one double bedroom on the ground floor, one double bedroom on the first floor, and a single "studio" bedroom on the second floor. This totals five bed spaces and would result in a reduction in the number of bed spaces from six to five across these floors in the existing building envelope and would therefore be contrary to London Plan Policy 3.14.B, which forms an integral part of Ealing's Development Management DPD.

"Loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace."

3 Family Housing

We are concerned at the applicant's proposal to delete all family housing from this site, which is located in the midst of an area of modest family housing.

The London Plan advises that:

"Family Housing is generally defined as having three or more bedrooms"
Paragraph 3.31

The site lies near the centre of the catchment area for two local primary schools, Little Ealing and Mount Carmel, and is subject to intense competitive pressure for family housing. Two further primary schools, Fielding and Grange are nearby.

The applicant has failed to provide any evidence of a lack of demand for family housing on this site. We therefore believe that an application for exclusively small and therefore not family friendly units should be resisted.

The family home at 273 Northfield Avenue has already been the subject of two extensions:

Ground floor rear extension - P/1998/1654, and
Loft conversion with rear dormer - P/1999/0129

The proposed extension will involve virtually full width rear extensions to 273 Northfield Avenue at both first floor and second floor levels. The rear extension will extend vertically up to the height of the roof ridge.

Ealing's local planning guidance contains the following explicit guidance concerning rear extensions above ground floor level:

"Two-storey rear extensions can be contentious and can pose problems due to the potential impact on neighbouring properties and more complex design issues. Two-storey rear extensions should appear subordinate to the original house and, if possible, should be set back from boundaries shared with neighbouring properties to minimise the potential impact."

*"Rear extensions should be designed so problems of dominant or overbearing appearance and overlooking or unacceptable loss of daylight or sunlight do not arise. **Extensions that negatively affect the residential amenity of neighbouring properties in these ways will not be permitted.**"* (our bolding)

Source: SPD 4 Residential Extensions, Section 5.

"Roof extensions, because of their prominence and impact on the profile of a house and the roofscape, can often significantly affect the character and living conditions of an area."

Source: SPD 4 Residential Extensions, Section 6.

This guidance does not even envisage that residents would seek to apply for three storey rear extensions, as is the case with 273 Northfield Avenue.

In this instance the proposed rear extension will both block afternoon sunlight entering the rear garden of the neighbouring property at 275 Northfield Avenue and will significantly add to the bulk and massing visible from the homes on the opposite, north, side of Wellington Road.

4 Existing Garage facing Wellington Road

The planning history set out in paragraph 2.5 of the Appellant's Statement omits any reference to the freestanding garage to the rear of the site. Nor can we find any reference to it on the Council's planning website.

We are concerned to note that the height of this boundary edge structure appears to exceed that permitted under the General Development Orders. For example the height of the side of the garage nearest the pedestrian alley alongside 58 Wellington Road is 2.5m while its ridge roof is 3.7m high.

We do not believe that the existence of an apparently unapproved structure should be allowed to set a precedent for an even larger and more prominent structure at this location.

5 Residential Density

The applicant is proposing to replace a modest single family home with six units. This represents a major increase in the housing density on the site and would significantly exceed the relevant upper values in the London Plan Density Matrix set out in Table 3.2 of the plan.

Ealing has adopted the London Plan Density Policy 3.4 and the Matrix in Table 3.2 as a key policy for the evaluation of local planning applications. A copy of Table 3.2 is inserted below.

The Policy states:

"Development proposals which compromise this policy should be resisted."

Policy 3.4 A

The table uses three bands to define locations:

- Suburban,
- Urban, and
- Central.

**EFRA OBJECTION TO PLANNING APPEAL 3004470
273 NORTHFIELD AVENUE. EALING, LONDON, W5 4UA**

Ealing's Development Management DPD Policy 3.4.B states: *"Appropriate density ranges in Ealing will normally be: **Central** in Ealing Metropolitan Town Centre, **Urban** in Acton, Greenford, Hanwell and Southall Town Centres, and **Suburban** in the rest of the Borough."* These density allocations were reviewed by the planning inspector who examined the Development Management DPD and found sound. The site is therefore in a Suburban location for density purposes.

The PTAL values for both the proposed main side entrance to the reconfigured 273 Northfield Avenue and the entrance to the proposed building on the site of the Garage is **"3"**. Please see the attached calculations from the TfL PTAL calculator, which are appended as appendices.

The maximum density values in London Plan Table 3.2 for **Suburban** settings with a **PTAL value of 3** are:

250 habitable rooms per hectare, and
95 units (homes) per hectare.

These are shaded in green on the table below.

The application's densities calculated by the planning officers are:

644 habitable rooms per hectare, and
297 units (homes) per hectare.

The nearest values to these are shown by the red boxes on the attached table.

In this instance the density of the proposed development massively exceeds the upper limits for a "Suburban" location. It also exceeds the middle "Urban" band. It is at the upper end, and above the upper end, of the "Central" band, which is intended to identify the most densely developed town centre locations in London.

While 644 habitable rooms is just within the Central maximum of 650, the 297 units (homes) exceeds the maximum value of 240 for Central London.

In these circumstances the Density Matrix clearly shows that the proposed development would be massively unsustainable for the location, and this alone provides a policy justification for refusing the application.

DENSITY MATRIX EXTRACT FROM LONDON PLAN 2011 (Unchanged in FALP 2015)

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
Urban	150-250 hr/ha	200-450 hr/ha	200-700 hr/ha
3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha
Central	150-300 hr/ha	300-650 hr/ha	650-1100 hr/ha
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha
2.7-3.0 hr/unit	50-110 u/hr	100-240 u/ha	215-405 u/ha

Notes to Table 3.2

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The settings can be defined as:

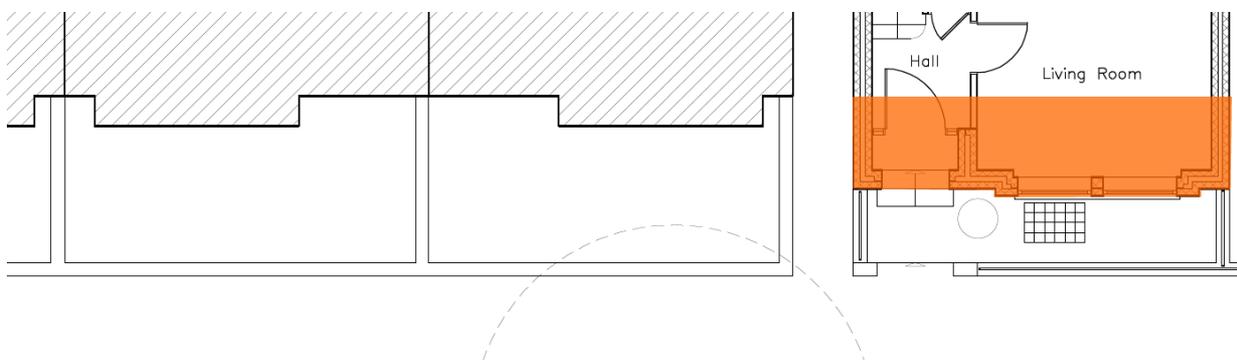
- central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.
- urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes
- suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

6 Local Character of Wellington Road

Wellington Road was constructed in four phases from 1910 to 1914 to a homogeneous design and common footprint, with slight variations to the brickwork. All the houses have an identical building line set back behind front gardens.

The proposed house on the site of the garage next to 58 Wellington Road would be forward of the building line and the side elevation of the first floor and roof will therefore be visible from much of the rest of the road.

Orange shading showing how new house will project forward of Wellington Road building line at ground floor, first floor and roof level



In this forward position it would be intrusive and would detract from the homogeneous character of the remainder of the road.

We therefore object to any construction at first and second floor level which would be forward of the building line. We note that other residents would not be allowed to construct similar structures in their front gardens.

We suggest that the construction of a house in this forward location would be in conflict with the provisions of Ealing's Local Development Management Policy 7.4.D, especially the guidance on Street Sequence (paragraph E7.4.2), Building Patterns (paragraph E7.4.3) and Scale (paragraph E7.4.4).

We therefore object to the construction of the proposed house in this forward location.

7 Living Conditions of Neighbouring Residents – Impact on Wellington Road

The applicant, and the committee report, acknowledge that the house to be constructed on the site of the garage would be built forward of the Wellington Road building line.

**EFRA OBJECTION TO PLANNING APPEAL 3004470
273 NORTHFIELD AVENUE. EALING, LONDON, W5 4UA**

This will overshadow and block the afternoon sunlight from the front rooms of the neighbouring Edwardian house at 58 Wellington Road.

The shadowing in the following extract from the planning application does not show the full impact of this shadowing.



The projecting front side elevation of the proposed house will also be seen from much of Wellington Road when looking towards Northfield Avenue.



We object to the loss of amenity which will be caused to the occupants of the front rooms of 58 Wellington Road due to the proposed forward location of the proposed house on the site of the neighbouring garage.

We draw the Inspector's to Ealing's Development Management DPD Policy 7B.A.b Good Levels of Daylight and Sunlight, which requires the amenity of neighbouring users to be considered in reaching any planning decision.

A further concern is the impact of the proposed construction on the outlook from no's 57 and 59 Wellington Road which currently enjoy an open aspect across the rear garden of 273 Northfield Avenue.

We therefore ask that the existing proposal for the house on the garage site is refused because of its unacceptably overbearing and visually intrusive nature.

8 Living Conditions of Neighbouring Residents – Overshadowing of the Rear Garden of 275 Northfield Avenue

We draw the Inspector's attention to the proposal to replace the existing ground floor rear extension behind 273 Northfield Avenue with a full height rear extension which will extend upwards to the height of the roof ridge of that house.

The following extracts from the application drawings show the proposed addition to the rear of 273 Northfield Avenue.

An indication of the extent to which the full height proposed rear extension to the existing house will block the western afternoon sunlight from entering the rear garden of 275 Northfield Avenue can be seen in the elevation extract on the previous page.

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**EFRA OBJECTION TO PLANNING APPEAL 3004470
273 NORTHFIELD AVENUE. EALING, LONDON, W5 4UA**

EXISTING SIDE ELEVATION



PROPOSED SIDE ELEVATION



We note that section 6 of SPD 4 states:

“Roof extensions, because of their prominence and impact on the profile of a house and the roofscape, can often significantly affect the character and living conditions of an area.”

Also, section 5 of SPD 4 states:

“Two-storey rear extensions can be contentious and can pose problems due to the potential impact on neighbouring properties and more complex design issues. Two-storey rear extensions should appear subordinate to the original house and, if possible, should be set back from boundaries shared with neighbouring properties to minimise the potential impact.”

*“Rear extensions should be designed so problems of dominant or v=overbearing appearance and overlooking or unacceptable loss of daylight or sunlight do not arise. **Extensions that negatively affect the residential amenity of neighbouring properties in these ways will not be permitted.**” (our bolding)*

The retired resident of the neighbouring property at 275 Northfield Avenue is at home during the day and makes extensive use of her rear garden.

The bulk and mass of the proposed first and second floor rear extensions to 273 Northfield Avenue will block the afternoon sunlight from entering the rear garden of 275 Northfield Avenue. This will result in a substantial loss of amenity to the neighbouring resident.

Such a loss of amenity would be inconsistent with the requirements of Ealing's Local Policy 7B.A. b Good Levels of Daylight and Sunlight.

We therefore ask that the rear extension to 273 Northfield Avenue at first and second floor level is refused.

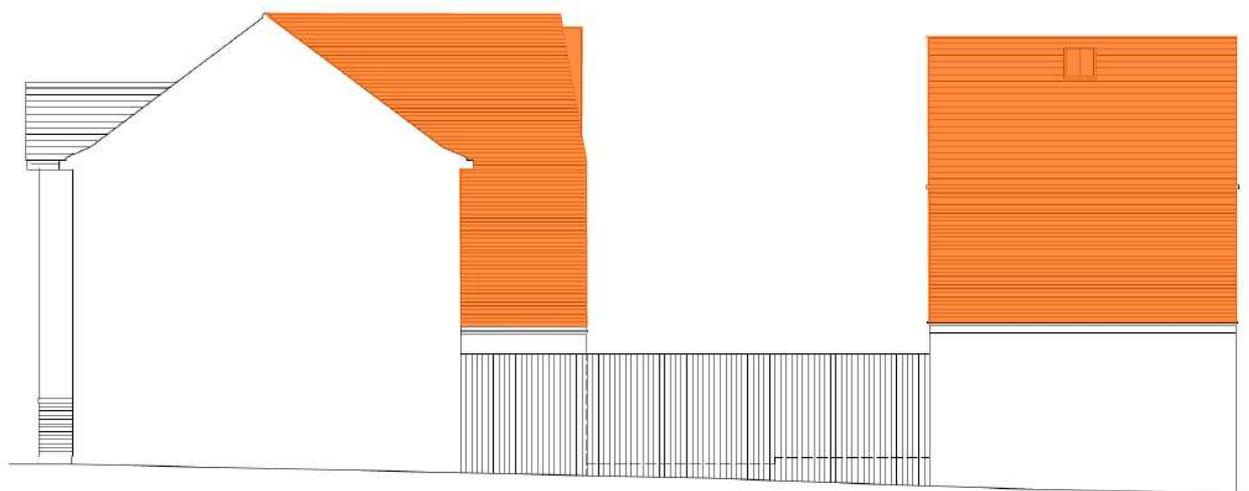
9 Living Conditions of Neighbouring Residents - Impact of proposed house on Garage site on 275 Northfield Avenue

A further concern is the impact of the two storey house, with its high pitched roof, which it is proposed to construct on the site of the garage.

The ground and first floor rear walls of the proposed house on the garage site will be flush with the boundary of the rear garden of 275 Northfield Avenue. The rear pitched roof will face towards the rear gardens of 275, 277 and 279 Northfield Avenue.

The height, bulk and mass of the proposed structure on the site of the garage would be imposing and dominate the rear garden of 275 Northfield Avenue. It would therefore unacceptably compromise the outlook and use of their rear garden for the occupiers of 275 Northfield Avenue. It would therefore conflict with policy 7.6 of the London Plan, policies 1.1.(g) and 2.10 of Ealing's Core Strategy and policy 7B of Ealing's Development Management DPD.

PROPOSED ELEVATION FROM NEIGHBOURING PROPERTY AT 275 NORTHFIELD AVENUE



 Orange = Extension and New Build

The dimensions of the proposed roof above the house on the garage site suggest that it is intended for a future loft conversion, with the dormer window overlooking 275 Northfield Avenue.

We are concerned that the applicant may seek at a future date to convert the roof space above this proposed house, on the garage site, to accommodation.

A dormer extension to the roof would further increase the massing at second floor level along the boundary with the rear garden of 273 Northfield Avenue. Any windows in the roof space would result in excessive overlooking of the rear gardens of 275, 277 and 279 Northfield Avenue, with the resulting loss of amenity to those residents.

It would also further increase the already excessive density of the proposed development.

In the event that the Inspector was minded to approve the application, we ask that a condition is added preventing the construction of dormer extensions and/or windows in the roof space and/or the conversion of this loft space to residential use.

We therefore ask that if the Inspector was minded to allow the appeal, that a planning condition is included which explicitly prohibits any future conversion of the roof space above the house on the garage site, and also prohibits the insertion of any windows facing the garden of 275 Northfield Avenue.

10 Living Conditions of Future Residents - Private Garden Space

The application proposes to delete the rear garden of a family home.

It fails to address the private garden space requirements set out in Table 7D.2 of Ealing's Development Management DPD.

The table in paragraph 3.5 of the Appellant's Statement only refers to the lesser London-wide minimum private outdoor space requirement set out in Baseline Standard 4.10.1 on page 69 of the London Plan Housing SPG.

The application fails to comply with the greater minimum garden space standards set out in Policy 7D, and the notes to Table 7D.2, of Ealing's Development Management DPD, which are:

- 15 sqm for a flat, and
- 50 sqm for a house.

The notes to Table 7D.2 also state that:

*"This space must be fit for purpose, **genuinely private, screened from roads and not permanently overshadowed.** Narrow, unusable areas and leftover strips adjacent to parking areas should not count towards this requirement."*

**EFRA OBJECTION TO PLANNING APPEAL 3004470
273 NORTHFIELD AVENUE. EALING, LONDON, W5 4UA**

A highlighted copy of the Ealing Development Management Policy is attached as an appendix.

The following table, based on the table in paragraph 3.5 of the Appellant’s Statement, sets out the reasons why the proposed amenity spaces fail to comply with Ealing’s planning policies.

Unit	Location	Floor	Open Space Provision (sqm)	Reason why fails to comply
1	House site	Ground Floor	17.2	Located at very front of the front garden in front of proposed lightwell and therefore is not “genuinely private”. Therefore 17.2 sqm does not count towards 15sqm requirement.
2	House site	Basement	12.5	“Permanently overshadowed” basement amenity space which does not count towards 15 sqm requirement. Also less than 15 sqm requirement for a flat.
3	House site	First Floor	26 (shared)	Not “genuinely private”. Area is shared with all residents when they need to access bicycle storage and refuse bins. Space of 26 sqm includes bicycle and refuse storage, which cannot be considered amenity space. Minimum shared space for two flats would equate to 30 sqm (15 x 2).
4	House site	Second Floor	26 (shared)	As 3 above.
5	Garage site	Two Storey House	10	Two storey building is a house and should have 50 sqm amenity space. The proposed 10 sqm patio is less than the minimum flat requirement.
6	Garage site	Basement	12.3	Basement amenity space. Less than 15 sqm and also “permanently overshadowed”. 12.3 sqm appears to include space occupied by stairs and refuse storage.

We suggest that the basement lightwells should not count towards this provision as they will be “permanently overshadowed” and therefore fail to comply with the guidance in the notes under Table 7D.2.

If the basement lightwells were to count as garden space, their areas are too small and fail to provide the 15 sq. m. specified in the note to Table 7D.2. The front garden lightwell is 12.3 sq. m.

While the gross measurement of the rear lightwell is the same, a further concern is that a significant portion of the rear lightwell will be occupied by steps up to ground level and an enclosed bin store.

We note that the hard paved terrace area for the house to be built on the site of the garage only amounts to 10 sq. m., while the notes to Table 7D.2 say that this should typically equate to 50 sq. m.

The only communal space we can identify is the passage way / yard which will be used to provide access to the refuse containers and cycle storage. We do not accept that this can be regarded as communal garden space or that it will be used as such.

It is therefore our view that this application totally fails to provide the useable garden and private amenity space required under the planning policies. This omission, in a designated suburban location, will have a serious adverse effect on the living conditions of future residents of the development.

11 Living Conditions of Future Residents - Basement Accommodation

Two of the proposed units will be self-contained basement flats. They will not share any accommodation at ground level or the upper floors. This is very different from when a home owner increases the size of their house by adding a basement room.

Neither of the two units will be provided with dual aspect.

We fail to see how the light tube referred to in paragraph 6.14 of the Appellant's Statement can be regarded as providing dual aspect, given its restricted dimensions and the fact that it will extend from the proposed basement flat to the roof above the uppermost flat.

Natural Light and Sunlight

The two self-contained basement units will only have limited access to natural light and sunlight via restricted lightwells.

Ealing's Development Management DPD incorporates the policies and guidance set out in the London Plan. Policy 7B.A requires new developments to achieve a high standard of amenity for users and that subparagraph "b" refers to "Good Levels of Daylight and Sunlight" and draw your attention to the guidance in paragraph E7.B.2.

The London Plan policies form an integral element of Ealing's Development Plan DPD. We therefore believe that any basement units should be required to demonstrate compliance with standards 5.5.1 and 5.5.2 on page 72 of the London Plan Housing SPG, which state:

“Glazing to all habitable rooms should be not less than 20% of the internal floor area of the room.” (Standard 5.5.1)

“All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.” (Standard 5.5.2)

There is further guidance in paragraphs 2.3.38 & 39 of the SPG.

The applicant has not provided any supporting evidence of the amount of sunlight and daylight which is expected to penetrate these basement rooms. For example the Bream and related sunlight and daylight assessments which are submitted as supporting application documents in order to substantiate minimum acceptable levels in all the habitable rooms.

We cannot believe that lower standards should be accepted for exclusively basement accommodation, when higher standards are required for above ground homes.

Ventilation of the self-contained Basement Units

We cannot locate any description amongst the application documents, or the committee report, as to how the basement flats will be ventilated. This is likely to be a particular problem given their lack of natural ventilation through these units.

The extract of fumes from their basement kitchens and bathrooms needs to be addressed, so that it does not adversely affect the amenity of neighbouring residents.

We therefore request that the proposed basement flats are refused until the applicant is able to demonstrate how they will comply with the provisions of London Plan Policy 7.14 and the associated guidance contained in the London Plan Housing SPG, notably Standard 5.6.1 and paragraphs 2.3.40 & 41 on page 73.

Lightwells and Local Character

We draw your attention to the following guidance in section 10 of SPD 4 which states:

“In streets where basements and lightwells are not a traditional feature, the excavation of a basement can have a significant impact on the appearance of the house and the street scene.”

The proposed extensive front garden lightwell facing Northfield Avenue will be particularly noticeable and out of character.

We suggest that the construction of a large and prominent lightwell in the front garden alongside the boundary with the neighbouring property would have an adverse impact on both local character and the neighbouring property and should therefore be refused.

The statements in paragraphs 5.5 and 5.22 of the Appellants Statement that “basements are not necessarily a feature of” Northfield Avenue and Wellington Road respectively are ambiguous.

There are no basements with lightwells in either road. Nor, with one exception, are there any basements with lightwells in any of the roads within at least half a mile of the appeal site. Even at that distance the lower ground floors of some late Victorian properties are only half-basements with half the height of their bottom storey being above ground level.

The only exception is the 2006 development on the Bramley Road frontage behind the pharmacy at 261 Northfield Avenue, which is discussed in more detail in the following section.

We are constantly advised by the Council that individual planning decisions should not be cited as a precedent for future applications.

The inappropriateness of the Bramley Road decision as a precedent has been confirmed by two recent planning decisions by the Council, where applications for the construction of similar self-contained basement flats were refused.

The Decision Notices are reproduced below:

P/2014/1320 Decision Notice dated 21st May 2014

“The development by reason of the provision of inadequate internal floor space and layout, poor light, privacy and restricted outlook would provide substandard living accommodation to the detriment of the living conditions of future occupiers of the proposed ground floor unit. As such, the proposal is contrary to policies 7.3 and 7B of the Ealing Development Management Development Plan Document (2013), policies 3.5, 7.2, 7.4 and 7.6 of The London Plan (2011), the London Plan Supplementary Planning Guidance and the National Planning Policy Framework (2012).”

P/2014/1617 Decision Notice dated 4th July 2014

“The proposed basement flat by reason of its subterranean location, poor aspect and poor level of natural light would constitute a sub-standard form of poor quality of accommodation and in conjunction with the existing three-flats at 35 the Park would represent an overdevelopment of the site having regard to policies 3.4 and 3.5 of the London Plan and 3.5, 7.4 and 7B of the Ealing's Development Management Development Plan Document (DM DPD) (December 2013) and guidance outlined in the London Housing SPG.”

London Plan Policies

We also note that the appellant has not provided any supporting statements or documents which address the issues associated with subterranean extensions. Paragraph 1.2.25 on page 25 of the

London Plan Housing SPG lists a number of relevant London Plan policies and we believe that any application for such an extensive basement area should be refused in the absence of this supporting documentation.

12 Differences between 261 and 273 Northfield Avenue.

In their Statement the Appellant makes a number of references in paragraphs 5.5 to 5.8 to a development to the rear of the mixed use building at 261 Northfield Avenue.

We believe that there are a number of differences between that site and 273 Northfield Avenue.

Planning Policy Status

Firstly the planning status of the locations is entirely different.

261 Northfield Avenue was constructed as a mixed use building with retail on its ground floor and residential on its upper storeys. In addition to a “primary frontage” designation in the Local Plan 261 Northfield Avenue, with its rear curtilage, is also within the boundaries of the designate Northfield Neighbourhood Centre. Neighbourhood Centres are designated centres within the London Plan hierarchy of Town Centres, and are defined in Annex Two to the London Plan.

Paragraph 3.19 and amended policy 2.15 of the FALP identifies Town Centres as locations where residential development and densification might be appropriate.

273 Northfield Avenue was constructed as part of a terrace of modest family homes. This house, together with all the others in the terrace have remained in exclusively residential use. The house, and all others in the terrace, are located outside the boundaries of the Neighbourhood Centre. The densification policy provisions of the London Plan do not apply to them.

An annotated map is appended which shows the location of 261 and 273 Northfield Avenue and their relationship to the designated neighbourhood town centre.

Design Differences

There are significant design differences, which have material implications for the neighbouring residents, between the constructed development behind 261 Northfield Avenue and that behind 273 Northfield Avenue. These are summarised and set out below.

**EFRA OBJECTION TO PLANNING APPEAL 3004470
273 NORTHFIELD AVENUE. EALING, LONDON, W5 4UA**

Development behind 261 Northfield Avenue	Proposed development behind 273 Northfield Avenue
A 2.6m wide vehicle wide service road separates the development from the neighbouring family home at 93 Bramley Road.	Only a narrow pedestrian alley 0.9m wide will separate the proposed development from the neighbouring family home at 58 Wellington Road.
The nearest frontage of the development, which contains its Bramley Road entrances, is stepped back for a distance of 2.6m behind the front of the bay windows of 93 Bramley Road.	The frontage of the proposed house on the site of the current garage will be forward of the front bay windows of 58 Wellington Road. It will therefore cause harm to these residents by blocking afternoon sunlight and daylight.
The neighbouring property at 263 is also mixed use and the rear yard is not used as a garden.	The neighbouring property at 275 Northfield Avenue is a family home with an intensively used rear garden

In summary, the development to the rear of 261 Northfield Avenue and facing Bramley Road is stepped back from the pavement so that for a **combined buffer distance of 5.8m** (0.6m corner recess & 2.6m driveway & 2.6m recessed entrance) it does **not** project forward of the bay windows of 93 Bramley Road, the Edwardian house at the end of the Bramley Road terrace. This means that there is no overshadowing of the front rooms of 93 Bramley Road.

Photos of driveway and set-back in Bramley Road



In comparison, the proposed house on the site of the garage at 273 Wellington Road will project forward of the bay windows of 58 Wellington Road and will **only be separated by a 0.9m pedestrian alley**.

Photo of Pedestrian Alley in Wellington Road



For the above reasons we believe that the development on the Bramley Road frontage behind 261 Northfield Avenue does not provide a precedent for the development proposed for 273 Northfield Avenue and the subject of this appeal.

13 Car Parking

Wellington Road is subject to considerable parking pressures and is located in a CPZ.

The conversion of this family home to six residential units with some twelve adult occupants is likely to generate additional parking pressures.

We therefore ask that a legal restriction prohibiting the residents of any additional units from applying for CPZ parking permits is imposed if planning approval was to be granted, i.e. retaining the status quo with CPZ parking rights being restricted to a single unit on the appeal site..

14 Site Visit

We appreciate that the Inspector will wish to make an unaccompanied site visit.

We would ask that as part of that visit he arranges to visit the rear garden of 275 Northfield Avenue.

This location was visited by members of the Ealing Planning Committee prior to the Committee Meeting which refused the application, and assisted the councillors in assessing the impact of the proposed development on the occupiers of 275 Northfield Avenue. Some comments by members of the Planning Committee are appended to this submission,

The contact details for the resident are:

275 Northfield Avenue
Ealing W5 4UA

Phone:

Mobile:

Daughter's email:

15 Possible Conditions

In the event that the Inspector is minded to approve the application we request the following planning conditions.

- Only one unit on the appeal site will be entitled to apply for CPZ parking rights.
- Prohibiting any reconfiguration, conversion or insertion of windows to the rear of the first floor and in the roof space of the house proposed for the site of the existing garage

16 Conclusion

We believe that this application would constitute a material over-development of this site and would therefore be inappropriate. It would have pronounced adverse impacts on the amenity of neighbouring and future residents and also on the character of the local neighbourhood.

For the reasons set out above we request that this appeal is unconditionally refused.

Yours Sincerely

James Guest

Ealing Fields Residents' Association
Committee member with responsibility for Planning Matters

Attachments

- Annotated map comparing planning policy status of 261 and 273 Northfield Avenue.
- Private Garden Space Provisions – Table 7D.2 of Ealing's Development Management DPD.
- PTAL calculation for the main entrance to the converted flats at 273 Northfield Avenue.
- PTAL calculation for the entrance to the new accommodation on the site of the garage.
- Extract from Minutes of 13th August 2014 Planning Committee meeting.

Planning Policies referred to (we understand that Ealing Council will be providing copies of these documents – but can forward them if required):

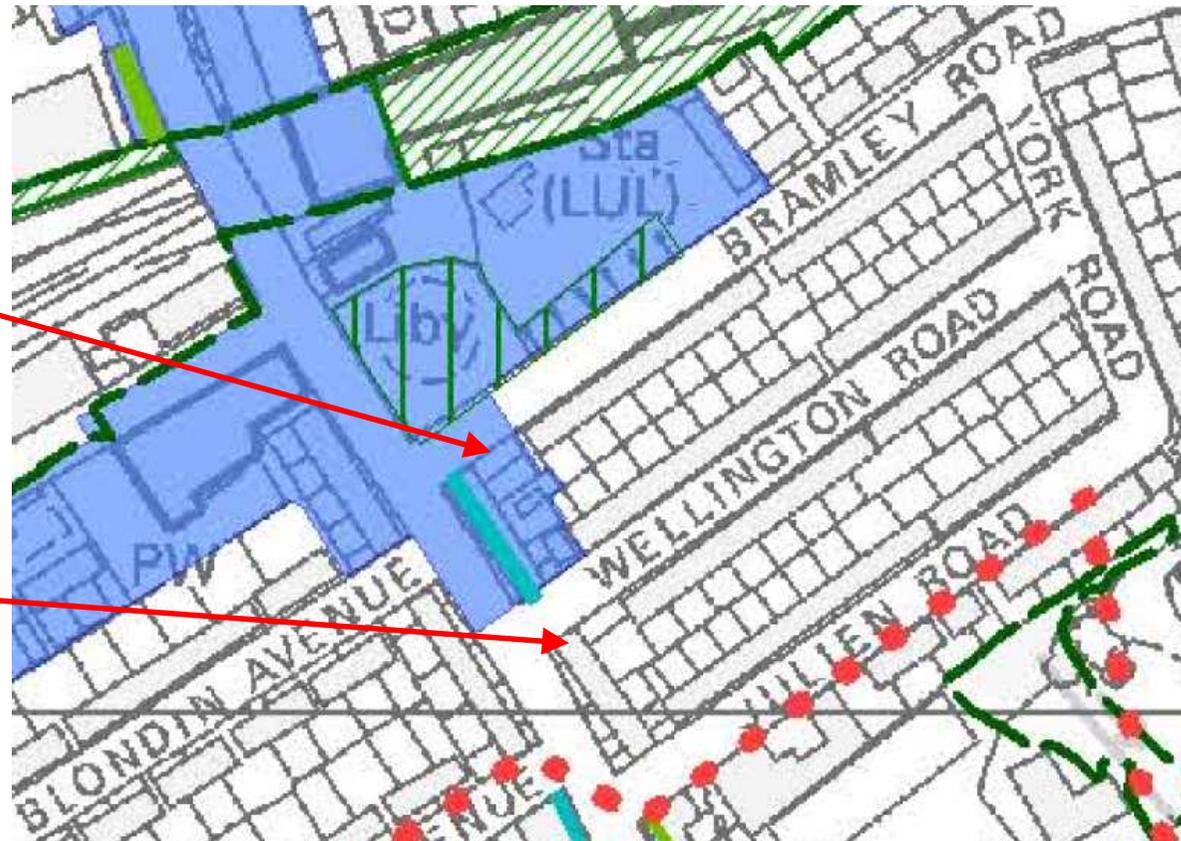
- London Plan (FALP) 2015,
- London Plan Housing SPG,
- Ealing's Core Strategy DPD,
- Ealing's Development Management DPD,
- Ealing's SPD 4 Residential Extensions.

COMPARISON OF PLANNING POLICY STATUS OF 261 AND 273 NORTHFIELD AVENUE

The difference in planning status between 261 and 273 Northfield Avenue means that the developments at the rear of 261 Northfield Avenue do not provide a precedent for the appealed application to develop 6 residential units on the site of the modest residential home at 273 Northfield Avenue.

The rear extension in Bramley Road is located behind retail premises at 261 Northfield Avenue which, with its rear yard, is located within the designated Neighbourhood Centre.

273 Northfield Avenue is a modest, exclusively residential property, which is located outside the designated Neighbourhood Centre



- Ealing Council
Local Plan
Adopted Policies Map
December 2013
East Sheet
- Borough Boundary
 - Green Belt
 - Metropolitan Open Land
 - Public Open Space
 - Community Open Space
 - Green Corridor
 - Acton Green Corridor Policy Area
 - Blue Ribbon Network
 - Site of Importance for Nature Conservation
 - Heritage Land
 - Regionally Important Geological Site
 - Archaeological Interest Area
 - Landmark
 - Town Centre
 - Neighbourhood Centre
 - Primary Shopping Frontage
 - Secondary Shopping Frontage
 - Strategic Industrial Location
 - Locally Significant Industrial Site
 - Development Site

Source: Ealing Council's Local Plan Adopted Policies Map
web link: http://www.ealing.gov.uk/info/200921/local_plans/1513/adopted_policies_map

7. LIVING PLACES AND SPACES

Table 7D.2 Space provision requirements

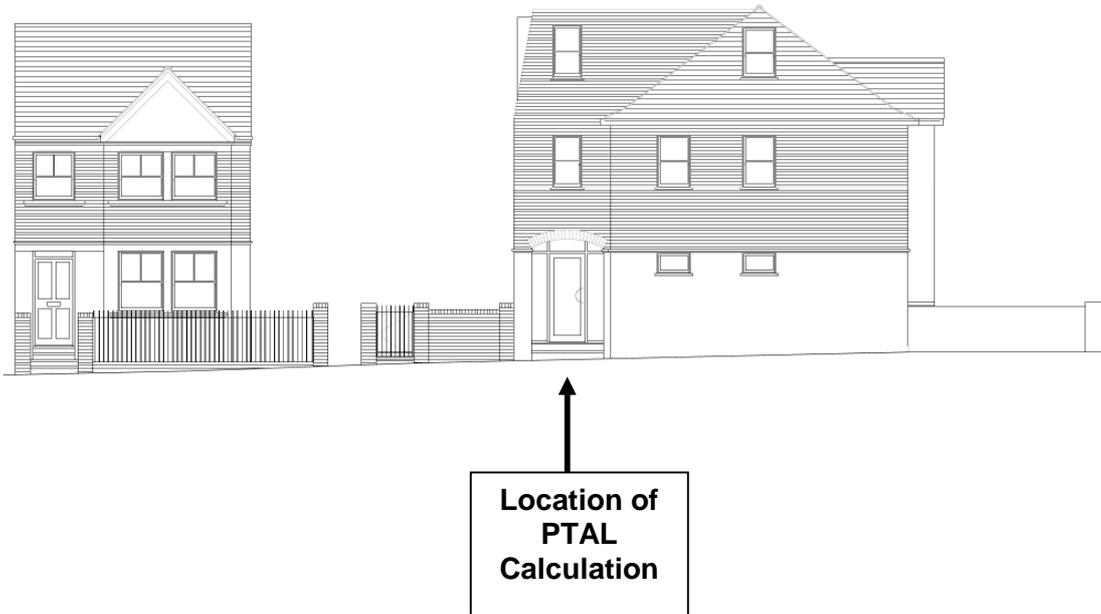
Provision Type	Area Requirement
Private Garden Space (House)	5 sq. m. per 1-2 person unit, plus 1 sq. m. for each additional occupant*
Private Garden Space (Flat)	5 sq. m. per 1-2 person unit, plus 1 sq. m. for each additional occupant**
Amenity Space	50 sq. m per 1,000 sq. m of floorspace
Public Open Space	19.5 sq. m. per person***
Children's Play Space	10 sq. m. per child****
Allotments	1.7 sq. m per person
Active Recreation (Outdoor)	7.3 sq. m. per person*****

Key:

- * This minimum baseline requirement derives from the Mayor's Housing SPG, and in most circumstances will need to be supplemented by additional private garden space to satisfy other policy requirements/ design considerations. The amount and form of provision should respond to the physical context, respecting the established local character and pattern of building, public space, landscape & topography. This provision should therefore seek to preserve the established urban grain, and by providing a relationship between the proposed development and neighbouring buildings and spaces, safeguard the privacy and amenity of existing and future occupants. Typically this would equate to an area of 50 sq. m of private garden space per house. This space must be fit for purpose, genuinely private, screened from roads and not permanently overshadowed. Narrow, unusable areas and leftover strips adjacent to parking areas should not count towards this provision requirement. In respect of strategic development some of this additional provision may be substituted by Public Open Space provision.
- ** This minimum baseline requirement derives from the Mayor's Housing SPG. This will typically take the form of private balcony areas for upper floor units and private garden areas for ground floor units. In addition communal provision should also be provided of a sufficient size to accommodate the need for recreation and landscaping. The amount and form of provision should respond to the physical context, respecting the established local character and pattern of building, public space, landscape & topography. This provision should therefore seek to preserve the established urban grain, and by providing a relationship between the proposed development and neighbouring buildings and spaces, safeguard the privacy and amenity of existing and future occupants. Typically this would equate to an area of 15 sq. m per flat. This space must be fit for purpose, genuinely private, screened from roads and not permanently overshadowed. Narrow, unusable areas and leftover strips adjacent to parking areas should not count towards this provision requirement. For smaller schemes such provision may also offset the need for additional child play space. Roof space should where possible also be maximised.
- *** This standard derives from the Council's Green Space Strategy. Public Open Space provision should be determined, having regard to the borough target of 19.5 sq. m. per person, the amount of Private and Communal garden space proposed beyond the baseline standard, and the overall site area. Typically, for those developments, which make a high level of provision of private/communal garden space beyond the baseline standards, additional Public Open Space provision may not be required. Where planned garden space provision is low, provision will be sought on site where space allows, or via a financial contribution where space is constrained. Onsite provision will be prioritised in areas of deficiency. Reference in this regard should be made to the deficiency mapping provided in the Policies Map Booklet. In addition where existing Public Open Space exists in an area, but is already intensively used exceeding its capacity, the creation of new space may be preferable to securing further contributions. Typically strategic developments will have greatest potential to accommodate new Public Open Space onsite.

**Planning Application P/2014/2273
273 Northfield Avenue, Ealing, W5 4XB
and in rear garden facing Wellington Road**

**PTAL calculation for the main entrance
to the converted flats at 273 Northfield Avenue.**



PTAI Study Report File Details

Date 16/06/2014 13:58

Day of week M-F

Time period AM peak

Walk speed 4.8 kph

Walk file PLSQLTest

POI Name: 517185, 179027

Bus Services

Reliability factor for this mode is 2

Maximum walk time for this mode is 8 minutes

Maximum walk distance for this mode is 640.0 metres

Stop NORTHFIELDS STATION

Walk time to stop from POI is 2.03 minutes

Walk distance to stop from POI is 162.41 metres

Route E2 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Route E2 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes

Stop NORTHFIELD AV JULIEN RD

Walk time to stop from POI is 0.8 minutes

Walk distance to stop from POI is 64 metres

Route E2 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Route E2 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes

Stop WINDMILL ROAD THE RIDE

Walk time to stop from POI is 7.67 minutes

Walk distance to stop from POI is 613.54 metres

Route E2 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route E2 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

TATs for this mode

Route E2 Stop NORTHFIELD AV JULIEN RD TAT 6.55 minutes EDF 4.58

Route E3 Stop NORTHFIELD AV JULIEN RD TAT 5.8 minutes EDF 5.17

Best EDF is 5.17

Half of all other EDFs is 2.29

AI for this mode is 7.46

Underground Services

Reliability factor for this mode is .75

Maximum walk time for this mode is 12 minutes

Maximum walk distance for this mode is 960.0 metres

Stop Northfields

Walk time to stop from POI is 2.34 minutes

Walk distance to stop from POI is 187.08 metres

Route Piccadilly Line Cockfosters to Heathrow T5 Direction W/B Frequency 6.0 giving AWT of 5.0 minutes

Route Piccadilly Line Heathrow T5 to Cockfosters Direction E/B Frequency 6.0 giving AWT of 5.0 minutes

Route Piccadilly Line Heathrow Terminal 4 to Arnos Grove Direction E/B Frequency 2.0 giving AWT of 15.0 minutes

Route Piccadilly Line Heathrow Terminal 4 to Cockfosters Direction E/B Frequency 4.0 giving AWT of 7.5 minutes

Route Piccadilly Line Arnos Grove to Northfields Direction W/B Frequency 2.3 giving AWT of 13.04 minutes

Route Piccadilly Line Northfields to Arnos Grove Direction E/B Frequency 0.7 giving AWT of 42.86 minutes

Route Piccadilly Line Cockfosters to Heathrow Terminal 4 Direction W/B Frequency 6.0 giving AWT of 5.0 minutes

Stop South Ealing

Walk time to stop from POI is 8.34 minutes

Walk distance to stop from POI is 667.29 metres

Route Piccadilly Line Heathrow T5 to Cockfosters Direction E/B Frequency 6.0 giving AWT of 5.0 minutes

Route Piccadilly Line Northfields to Arnos Grove Direction E/B Frequency 0.7 giving AWT of 42.86 minutes

Route Piccadilly Line Cockfosters to Heathrow Terminal 4 Direction W/B Frequency 6.0 giving AWT of 5.0 minutes

Route Piccadilly Line Heathrow Terminal 4 to Cockfosters Direction E/B Frequency 4.0 giving AWT of 7.5 minutes

Route Piccadilly Line Arnos Grove to Northfields Direction W/B Frequency 2.3 giving AWT of 13.04 minutes

Route Piccadilly Line Heathrow Terminal 4 to Arnos Grove Direction E/B Frequency 2.0 giving AWT of 15.0 minutes

Route Piccadilly Line Cockfosters to Heathrow T5 Direction W/B Frequency 6.0 giving AWT of 5.0 minutes

TATs for this mode

Route Piccadilly Line Cockfosters to Heathrow T5 Stop Northfields TAT 8.09 minutes EDF 3.71

Route Piccadilly Line Heathrow Terminal 4 to Arnos Grove Stop Northfields TAT 18.09 minutes EDF 1.66

Route Piccadilly Line Cockfosters to Heathrow Terminal 4 Stop Northfields TAT 8.09 minutes EDF 3.71

Route Piccadilly Line Arnos Grove to Northfields Stop Northfields TAT 16.13 minutes EDF 1.86

Best EDF is 3.71
Half of all other EDFs is 3.61

AI for this mode is 7.32

Rail Services

Reliability factor for this mode is .75
Maximum walk time for this mode is 12 minutes
Maximum walk distance for this mode is 960.0 metres

** No stops found within buffer for this POI

Total AI for this POI is 14.79. X: 517185, Y: 179027.

PTAL Rating is 3.

**Planning Application P/2014/2273
273 Northfield Avenue, Ealing, W5 4XB
and in rear garden facing Wellington Road**

**PTAL calculation for the entrance
to the new accommodation on the site of the garage.**



PTAI Study Report File Details

Date 16/06/2014 14:05

Day of week M-F

Time period AM peak

Walk speed 4.8 kph

Walk file PLSQLTest

POI Name: 517193, 179033

Bus Services

Reliability factor for this mode is 2

Maximum walk time for this mode is 8 minutes

Maximum walk distance for this mode is 640.0 metres

Stop NORTHFIELDS STATION

Walk time to stop from POI is 2.16 minutes

Walk distance to stop from POI is 172.41 metres

Route E2 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Route E2 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes

Stop NORTHFIELD AV JULIEN RD

Walk time to stop from POI is 0.93 minutes

Walk distance to stop from POI is 74 metres

Route E2 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

Route E2 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction BACK Frequency 10.0 giving AWT of 3.0 minutes

Route E3 Direction OUT Frequency 10.0 giving AWT of 3.0 minutes

Stop WINDMILL ROAD THE RIDE

Walk time to stop from POI is 7.79 minutes

Walk distance to stop from POI is 623.53 metres

Route E2 Direction BACK Frequency 8.0 giving AWT of 3.75 minutes

Route E2 Direction OUT Frequency 8.0 giving AWT of 3.75 minutes

TATs for this mode

Route E2 Stop NORTHFIELD AV JULIEN RD TAT 6.68 minutes EDF 4.49

Route E3 Stop NORTHFIELD AV JULIEN RD TAT 5.93 minutes EDF 5.06

Best EDF is 5.06

Half of all other EDFs is 2.25

AI for this mode is 7.31

Underground Services

Reliability factor for this mode is .75

Maximum walk time for this mode is 12 minutes

Maximum walk distance for this mode is 960.0 metres

Stop Northfields

Walk time to stop from POI is 2.46 minutes

Walk distance to stop from POI is 197.08 metres

Route Piccadilly Line Cockfosters to Heathrow T5 Direction W/B Frequency 6.0 giving AWT of 5.0 minutes

Route Piccadilly Line Heathrow T5 to Cockfosters Direction E/B Frequency 6.0 giving AWT of 5.0 minutes

Route Piccadilly Line Heathrow Terminal 4 to Arnos Grove Direction E/B Frequency 2.0 giving AWT of 15.0 minutes

Route Piccadilly Line Heathrow Terminal 4 to Cockfosters Direction E/B Frequency 4.0 giving AWT of 7.5 minutes

Route Piccadilly Line Arnos Grove to Northfields Direction W/B Frequency 2.3 giving AWT of 13.04 minutes

Route Piccadilly Line Northfields to Arnos Grove Direction E/B Frequency 0.7 giving AWT of 42.86 minutes

Route Piccadilly Line Cockfosters to Heathrow Terminal 4 Direction W/B Frequency 6.0 giving AWT of 5.0 minutes

Stop South Ealing

Walk time to stop from POI is 8.22 minutes

Walk distance to stop from POI is 657.29 metres

Route Piccadilly Line Heathrow T5 to Cockfosters Direction E/B Frequency 6.0 giving AWT of 5.0 minutes

Route Piccadilly Line Northfields to Arnos Grove Direction E/B Frequency 0.7 giving AWT of 42.86 minutes

Route Piccadilly Line Cockfosters to Heathrow Terminal 4 Direction W/B Frequency 6.0 giving AWT of 5.0 minutes

Route Piccadilly Line Heathrow Terminal 4 to Cockfosters Direction E/B Frequency 4.0 giving AWT of 7.5 minutes

Route Piccadilly Line Arnos Grove to Northfields Direction W/B Frequency 2.3 giving AWT of 13.04 minutes

Route Piccadilly Line Heathrow Terminal 4 to Arnos Grove Direction E/B Frequency 2.0 giving AWT of 15.0 minutes

Route Piccadilly Line Cockfosters to Heathrow T5 Direction W/B Frequency 6.0 giving AWT of 5.0 minutes

TATs for this mode

Route Piccadilly Line Cockfosters to Heathrow T5 Stop Northfields TAT 8.21 minutes EDF 3.65

Route Piccadilly Line Heathrow Terminal 4 to Arnos Grove Stop Northfields TAT 18.21 minutes EDF 1.65

Route Piccadilly Line Cockfosters to Heathrow Terminal 4 Stop Northfields TAT 8.21 minutes EDF 3.65

Route Piccadilly Line Arnos Grove to Northfields Stop Northfields TAT 16.26 minutes EDF 1.85

Best EDF is 3.65

Half of all other EDFs is 3.57

AI for this mode is 7.23

Rail Services

Reliability factor for this mode is .75

Maximum walk time for this mode is 12 minutes

Maximum walk distance for this mode is 960.0 metres

** No stops found within buffer for this POI

Total AI for this POI is 14.54. X: 517193, Y: 179033.

PTAL Rating is 3.

Planning Appeal 3004470 – Ealing Planning Application P/2014/2273

273 Northfield Avenue, Ealing, W5 4XB
and in rear garden facing Wellington Road

Ealing Planning Committee 13th August 2014

At the committee meeting the councillors rejected the officer advice to approve the application and voted unanimously refused it.

The following is a summary of their comments from the minutes.

Comments by Committee Members

Councillor Manro commented that he was on the site visit. He felt that this was one of the worst applications he had seen, allowing 6 units to be built on one family dwelling. The high density of the scheme was way outside what should be allowed. There was overlooking and also underground development. He felt that the scheme was atrocious.

Councillor Sumner said he agreed with Councillor Manro; he could see from the site visit the effect this scheme would have on neighbours.

Councillor Blacker stated that there were material grounds why this application should be refused.

Councillor Gulaid had similar concerns stating that this was overdevelopment on a major scale.

Councillor Cogan stated that from the site visit it was easy to see the impact on neighbours.

Councillor Busuttil agreed with all the comments made and while there was a housing need, this kind of development wasn't needed