



Please reply to:

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Northfields
Ealing
W5 4UH

James Egan
Planning Services
Ealing Council
Perceval House
14-16 Uxbridge Road
Ealing
W5 2HL

21st December 2014

Dear Mr Egan,

Planning Application P/2013/4082 – Revised October 2014
Assyrian House, South Ealing Road / Temple Road, Ealing, W5 4SL

I write on behalf of our residents' association in respect of the above planning application.

1 Introduction:

Ealing Fields Residents' Association (EFRA) is a large residents' association with in excess of 500 subscription members who live in the neighbourhood surrounding Northfields station.

This locally prominent application site lies at the edge of our membership area and the nature and scale of the proposed development has implications for the amenity of our members and their neighbours, as do the proposals for late night event parking behind and alongside the Ealing Christian Centre in Northfield Avenue.

2 Summary

We have studied the further revisions to the planning application which are available on the Council's planning website. These appear to consist of the drawings:

- D 1 – Location Plan – dated 20/09/2014
- D 3 – Site Plan - dated 20/09/2014
- D 4 – Ground & First Floor Plans – dated 20/09/2014

D 5 – Second & Roof Floor Plans – dated 20/09/2014

D 6 – Section A-A, B-B, C-C – dated 20/09/2014

D 7 – Elevations – date 20/09/2014

We note that confusingly, multiple versions of many of these drawings appear to have been uploaded and that the Council has failed to identify the operative version of each drawing.

We are disappointed that no revisions or supplements to the applicant's 2013 supporting statements have been submitted. The versions of the Design & Access, Transport, and Noise statements on the Council's website date from 2013. In particular, the Transport Statement has not been updated with the missing information identified in Section 11 of our objection dated 16th November 2013.

We reiterate our earlier objections to applications P/2013/1087 and P/2013/4082 and object to the granting of the planning application for the following reasons:

- The failure of the proposed development to respect the externally visible frontages of this prominent local heritage building and site,
- Neighbourhood Character,
- The impact of the proposed two storey western infill along the site's boundary with 2 Temple Road,
- The impact of the proposed second floor infill along the southern boundary of the site on the amenity of the neighbouring first floor residents who live above the shops at the junction of South Ealing Road and Little Ealing Lane,
- The poorly substantiated and potentially misleading statements contained in the supplementary Planning and Management Statement,
- Failure to provide adequate disabled access,
- The inadequate nature of information provided in the Transport Statement and Parking Strategy,
- Parking and Traffic pressures on the occupiers of the neighbouring residential side streets,
- Noise from evening and weekend use of the new facilities and their clientele.

The above concerns are set out in greater detail below.

3 Exterior Street Frontages of the Proposed Development

The late Victorian Hall, now used as the Assyrian Centre, on the junction of Temple and South Ealing Roads, dates from the urbanisation of the local area and represents one of the few heritage buildings in the locality. We therefore believe that its exterior street frontages should be retained intact and should not be the subject of unsympathetic external alterations.

The fenestration of the proposed ground floor windows on the Temple Road frontage is disappointing and reminiscent of the grills installed in front of window openings on high security buildings.

We are disappointed by the exterior design and fenestration proposed for the infill to the south of the existing hall on the South Ealing Road frontage. This lacks sympathy for the existing building and the finesse shown by extensions to other local community/religious

buildings, for example the hall at Christ the Saviour, and its neighbouring junior school, in Ealing town centre, St Andrew's church hall in Mount Park Road, and St Paul's church hall in Brentford.

We draw your attention to the provisions of:

- NPPF paragraphs 126 to 131,
- London Plan 7.8 Heritage Assets, which is subsumed into the emerging Ealing Development Management DPD, and
- The provisions in Local Policy 7C Heritage in the adopted Ealing Development Management DPD.

While the existing building may exhibit signs of some neglect and possibly unapproved modifications, we do not believe that this should provide the justification for the proposed external alterations set out in the planning application. We draw you attention to the following wording in paragraph 130 of the NPPF:

“Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.”

4 Neighbourhood Character

We draw you attention to the overwhelmingly homogeneous character of the surrounding Edwardian neighbourhood, including the housing in Temple Road, Creighton Road and Netherbury Road.

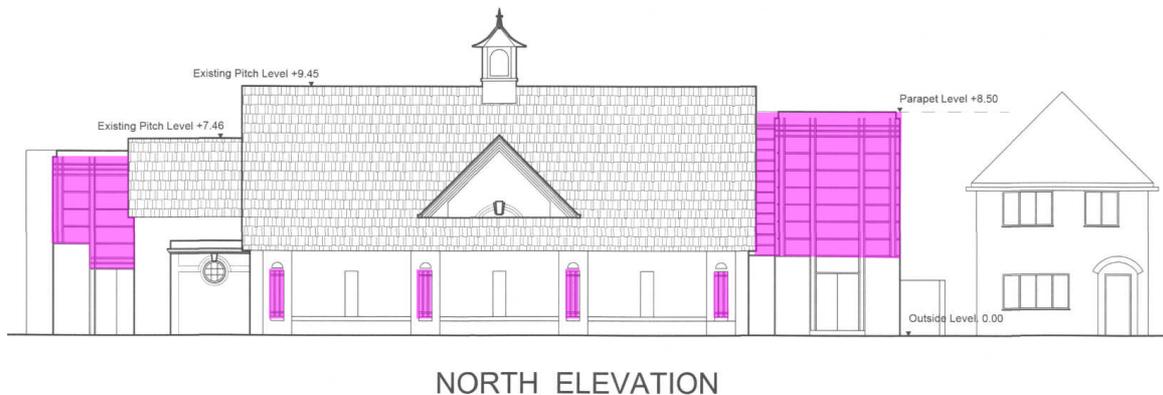
We also draw your attention to the quality and intact nature of the Temple Road frontage of the Edwardian apartment block facing the Assyrian Centre, as shown in the photograph below.



We therefore ask that this application is carefully considered against the provisions of London Plan Policy 7.4 and the Local Variation to 7.4 and Policy 7B Design Amenity set out in Ealing's adopted Development Management DPD.

5 Infill between Assyrian Centre and 2 Temple Road

At present there is open space between the western elevation of the Assyrian Centre and the neighbouring property at 2 Temple Road.



While a ground floor infill at this location could be designed to blend into the Temple Road street scene, the construction of a first and second floor above it would be unacceptable.

The elevations show the proposed first floor infill as extending materially above the height of the eaves of the neighbouring 2 Temple Road. They also show the front of the proposed first floor projecting forward of the roof slope of the Victorian hall. The bulk and massing of the proposed extension would be excessive and therefore unacceptable. Its prominence and massing would be exacerbated by the exterior design chosen by the applicant.

6 First Floor infill along the south side of the site

We draw your attention to the following photograph which shows the absence of any first floor structures on the site to the south of the roof ridge above the hall.

The application proposes a two storey structure at this point which will be built up against the southern boundary of the site and forward of the current South Ealing Road frontage..

We suggest that this will result in unacceptable bulk and massing when viewed from South Ealing Road and a loss of amenity to the rear first floor rooms of the residential accommodation above the retail premises at the junction of South Ealing Road and Little Ealing Lane.





EAST ELEVATION

7 Roof “Terraces”

We note that on the drawings extensive areas of the roofs are labelled “access only for maintenance”. Many of these areas overlook neighbouring residential properties.

In the event that this application was to be approved, it should be conditioned to prohibit access to and the use of all areas of the roof.

8 Statements in Supplementary Planning and Management document

Licensing

On page 7 of this document it states that the Assyrian Centre currently obtains 15 temporary licences for alcohol a year and that the intention is to apply for a full permanent licence.

In paragraph 6.1 on page 8, which refers to the 250 person capacity Banquet Hall, the document states:

“It is necessary for the viability of the Community Centre to be able to use this facility for banqueting functions at least 2 evening (sic) a week at weekends.”

This would represent a major increase in banqueting/function activity above the historic and stable level designed to cater for the needs of the centre’s members.

In proposing the doubling, as a minimum, of the banqueting/function activities the Applicant clearly intends to change the nature of the centre’s operations from one which caters for the needs of its members to a commercial licenced banqueting centre which is available for hire to any third party willing to pay the rental fees.

We do not believe this stepwise increase in licensed banqueting activities, and their provision for third parties, is appropriate for this residential area and would be detrimental to the amenity of the neighbouring residents and their children. We are therefore opposed to any increase in the banqueting/function activity. We are also opposed to any increase in the current licensing arrangements.

Community Facilities

Both the supplementary document and the main Design and Access Statement seek to justify the approximate doubling in the site's floorspace on the grounds that this will cater for an unspecified need for additional community space in the local area.

We suggest that there is no shortage of community facilities in the local area and draw your attention to the following provision:

Little Ealing Primary School, Little Ealing Lane,
Mount Carmel Primary School, Little Ealing Lane,
South Ealing Christian Centre and Hall, Junction & Carlyle Roads,
Ealing Christian Centre, Northfield Avenue,
Log Cabin Centre, Northfield Avenue,
Navasartian Centre, Northfield Avenue, and
Christadelphian Centre, Dorset Road.

These facilities are in addition to the local licensed premises, many of which are able to accommodate functions.

It is our view that the local area is well served by community facilities and that there is substantial surplus evening and weekend capacity across these facilities. We do not believe that additional licensed capacity is needed by local residents at this time.

9 Disabled Access and Parking

We doubt that the latest plans are fully compliant with the disability access legislation. This omission would be particularly significant given the stated community use of the building.

It is clear that the lift will not provide level access to either of the upper two floors of the proposed infill building along the western edge to the site and adjoining 2 Temple Road. According to the Applicant's drawings there will not be any disabled access to the: Reference Library, Sunday Classroom or Admin Office.

We are also concerned to note the absence of any on-site disabled parking provision. We are sure that planning standards requiring this for community facilities must exist.

10 Transport Statement and Parking Strategy document

General matters

We are disappointed by the absence of key information in the Transport and Parking Strategy document.

We cannot locate any analysis of the travel patterns of those attending the currently 15 licensed events referred to on page 7 of the Supplementary Planning and Management document. Information on the: numbers, home location, mode of travel and parking arrangements of those attending existing functions is a key minimum requirement.

We would have expected similar information to have been provided for the projected expanded function activity.

As twelve months have elapsed since the previous application documents were submitted, we find it inexplicable that the Council has not required the applicant to provide the missing information. This information would be regarded as essential in the case of any other application requiring a Transport Statement. It should be required in this case and be subject to public examination and comment before any decision is made on this application.

We question the likelihood that many, if any, of the attendees of the expanded function business will travel by public transport.

As noted in the following section we are extremely concerned at the incremental parking pressures which will result from the proposed banqueting activity operating at the minimum intensity of two evenings a week stated in paragraph 6.1 on page 8 of the Supplementary Planning and Management document.

We are also concerned at the increased late evening and early morning vehicle movements that would occur in the residential side streets.

We would also point out that the Transport Statement is in error when it states in paragraph 2.8 on page 3 that:

“The main vehicular access to the site is currently from South Ealing road.”

There is no access from South Ealing Road. The only access is from Temple Road. At present the site appears able to accommodate one or two parked vehicles inside this entrance. There do not appear to be any on-site designated parking spaces, not even disabled ones, on the ground floor plans for the proposed development.

Off-site Parking

We are extremely concerned at the proposal for late night and early morning off-site parking at the car park behind and alongside the Ealing Christian Centre, identified at the Elim Pentecostal Centre on the map below.

We draw your attention to the extent to which this car park, shaded red below, is overlooked by the rear bedrooms of the homes in Blondin Avenue, Redwood Grove and Northfield Avenue. We have also included photographs of the neighbouring properties from the car park.

We do not believe late night parking is acceptable on this location and are opposed to it.



Entrance from Redwood Grove



Looking towards rear of Blondin Avenue



Rear of 270 – 282 Northfield Avenue



Rear of 1-9 Redwood Grove



Servicing Arrangements

We do not believe that the Transport Statement adequately addresses the servicing arrangements which will be needed to accommodate the minimum level of banqueting activity proposed.

The ground floor plans are ambiguous and imply that servicing the expanded venue will be via the alley which leads out onto Little Ealing Lane.

Currently this alley is blocked off at the boundary to the Assyrian Centre site, and the alley is used for car parking by the neighbouring retailers. Please see the following photographs.



Access to and from this alley by delivery vehicles is likely to prove restricted due to the proximity of its street entrance to the junction of Little Ealing Lane with South Ealing Road and the eastbound E3 bus stop. Please see the following photograph.



11 Parking Pressures in the Surrounding Residential Side Streets

The proposals would result in the deletion of the small amount of on-site parking remaining on the site.

In the Design and Access Statement the applicant states that:

- The proposal is to double the floorspace of the existing building – PDF page 8
- That only 30-40 members use the existing ground floor hall – PDF page 9
- That existing facilities will be transferred to the proposed first floor facilities – PDF page 9
- That the proposed ground floor hall will be used for “banquet and other large functions”. – PDF page 9
- That **the proposed ground floor facilities will be rented out** in order to generate income – PDF pages 2, 6 and 9

The supplementary Planning and Management document states in paragraph 6.1 on page 8 that:

- The ground floor banqueting accommodates up to 250.

The applicant acknowledges that the current facilities are poorly patronised by members of the Assyrian community, a pattern of attendance which is common to many diaspora communities as they progress through the generations and descendants move away.

The statements in the Design and Access Statement indicate that the applicants are basing the expansion of their facilities on the assumption that they will be able to attract a very large number of income generating visitors and users from outside the Assyrian community to the expanded facilities.

The configuration of the expanded facilities and their stated use for high profile events, such as weddings and seasonal festivities, suggests that the majority of attendees will seek to travel by motor cars. It is most unusual for attendees of high profile and formal events to travel to and from them on public transport, even if public transport provided a direct route.

There is no quantification of the number of visitors and car movements which the proposed facilities are expected to attract. We find the absence of this information concerning, as the applicant must have modelled future attendances as part of their assessment of the financial viability of the project. Twelve months have elapsed since we first raised this concern, and the continuing absence of this essential information is inexcusable.

We are left with the expectation that a large number of patrons in the region of the 250 cited by the applicant in paragraph 6.1 on page 8 of the supplementary Planning and Management document will arrive by car whenever there is an evening function in the ground floor hall. This will place unacceptable parking pressures on the surrounding residential side streets and result in a material loss of amenity to the surrounding residents.

As the local CPZ only operates up to 7.30 pm Monday to Friday and up to 1.00pm on Saturdays, there is nothing to protect the surrounding residents from evening parking on Mondays to Fridays, afternoon parking on Saturdays, and all day parking on Sundays.

In these circumstances we believe that this application should be refused on parking grounds.

12 Noise

We cannot locate any information as to how the building will be “sound proofed” to ensure that noise from functions etc cannot be heard in the neighbouring residential properties.

Nor can we locate any measures whereby the applicant will seek to control the noise which will result from patrons leaving the premises late at night and in the early hours of the morning to collect their parked cars from the surrounding residential side streets, or board one of the proposed shuttle buses.

The proximity of three primary schools, Little Ealing, Mount Carmel and Grange, means that a disproportionate proportion of the neighbouring homes are occupied by families with young children. Late night noise in these residential side streets is therefore a particular concern in the case of this application.

We understand that both the Ealing Development Management DPD and the London Plan place considerable emphasis on protecting residential neighbourhoods from any increase in noise.

13 Failure to Consult Neighbouring Residents

This proposal has been presented as a development intended to benefit the wider local community.

In these circumstances, and given the scale of the proposed development, including the doubling of the existing floor space, we are disappointed by the applicant's apparent failure to conduct pre-application consultations with all the residents of the neighbouring streets. Approaching the occupants of a small number of neighbouring properties is no substitute for comprehensive community consultation.

We are also concerned by the failure of the Council to consult the residents of Redwood Grove, Blondin Avenue and 270-282 Northfield Avenue on the proposed change of use of the car park behind the Ealing Christian Centre. The role of this car park is solely to provide daytime parking for the worshippers attending the Ealing Christian Centre. The proposal to use the car park for regular late night parking by third party off-site banqueting attendees who are unconnected with the Ealing Christian Centre represents a significant change of its use from being ancillary to a place of worship.

We ask you to note this failure to consult adequately when drafting your report on the application.

14 Conclusion

For the reasons set out above, and in the interests of the human rights of the neighbouring residents, we request that this application is unconditionally refused.

Yours Sincerely

James Guest

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