



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

Nathalie Rose Lange
Planning Services
Ealing Council
Perceval House
14-16 Uxbridge Road
Ealing
W5 2HL

23rd October 2014

Dear Ms Lange,

Planning Application (Revised Plans) P/2014/4042
Conversion of single dwelling house into two flats with rear extension
at 12 Overdale Road, Ealing, W5 4TT

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.

Overdale Road lies near the centre of our membership catchment area and a number of our members have contacted us expressing their opposition to the proposed development.

We have studied the application documents and share our members concerns, we therefore object to this application for the reasons set out below.

2 Local Character

Overdale Road was constructed as a road of family terraced housing. The road has retained this character over its one hundred year existence and in many instances the houses have been expanded though loft conversions and single storey rear ground floor extensions to accommodate the evolving space expectations of today's families.

There are no purpose built apartments or flats in Overdale Road or in the neighbouring roads of Devonshire, Derwent, Trent and York Roads. The local neighbourhood is distinctive as a location because of its family housing.

This family focus and use of the neighbourhood is reinforced by its proximity to two primary schools, Little Ealing and Mount Carmel.

We are therefore most concerned at the loss of any family housing in this location. We believe the development would be against the character of the neighbourhood and therefore fail to comply with the requirements of London Plan Policies 3.5.B, 7.1.B, 7.1.C, 7.1.D and 7.4.B.

3 Outdoor Amenity Space

We are extremely concerned that no outdoor amenity space has been provided for the first/second floor flat.

This omission is a material breach of both the London Plan and Ealing planning policies. Its omission will result in a major lack of amenity for the future residents of the first/second floor flat.

We draw the Council's attention to the purpose built Edwardian and inter-war maisonettes which were constructed with direct and with separate access to the portion of the rear garden which was exclusively reserved for the use of the residents of the first floor flat.

The requirement for outdoor amenity space for the first/second floor flat is explicitly set out in both the London Plan Housing SPG (Baseline standard 4.10.1 on page 69) and in Ealing's Development Management DPD.

The referenced text which forms part of Table 7D.2 of Ealing's Development Management DPD states that:

"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."

We draw your attention to the highlighted text in the attached extract from the DPD.

We therefore believe that this omission is sufficient grounds for refusing this application.

4 Noise

The absence of outdoor amenity space for the first/second floor flat will mean that the residents of this flat will spend a disproportionate amount of their time indoors. The proximity of the first floor combined living room/kitchen at 12 Overdale Road to the adjoining first floor front bedrooms at 10 and 14 Overdale will mean that any noise from the combined living room/kitchen after a child's bedtime is likely to be disruptive to the occupants of the neighbouring properties.

We draw your attention to the London Plan Housing SPG and in particular Baseline Standard 5.3.1 on page 71 which states:

"The layout of adjacent dwellings . . . should seek to limit the transmission of noise to sound sensitive rooms within dwellings."

We also draw your attention to the provisions in Local Policy 7A of Ealing's Development Management DPD, which explicitly refers in 7A.A and 7A.B to emissions including noise (see paragraph E7.A.2) which would adversely affect the amenity of neighbouring residents.

This application fails to comply with this requirement in respect of the proposed conversion of a first floor bedroom to a living/dining room.

5 Wheelchair Accessible Bathroom and WC

The revised plans for the ground floor flat propose the installation of two WC/bathrooms.

We draw your attention to the London Plan Housing SPG and in particular Baseline Standards 4.6.2 and 4.6.3 on page 67 which state:

"Where there is no accessible bathroom at entrance level 135, a wheelchair accessible WC with potential for a shower to be installed should be provided at entrance level." (Standard 4.6.2)

"An accessible bathroom should be provided in every dwelling on the same storey as a main bedroom." (Standard 4.6.3)

An examination of the ground floor WC/bathroom layouts on drawing 1008 / 230a shows that neither of these bathrooms is compliant with the Housing SPG Baseline Standards.

The application should therefore be refused while this defect remains.

6 Natural Light and Rear Ground Floor Bedroom

We do not consider the proposed lightwell for the rear ground floor bedroom to be acceptable.

This room is at the same level as the rear garden and currently has direct access to it. This should be retained. The construction of a ceiling high extension immediately in front of this room's existing garden windows is unacceptable.

In the event that any young children were to reside in the ground floor flat, it is likely for child protection reasons that their parents would wish to accommodate them in what is in effect the internal rear ground floor bedroom. It is highly likely that their parents would surrender the master ground floor bedroom with its en suite bathroom.

The proposed lightwell configuration would therefore effectively "entomb" the children when they are using the internal bedroom during the hours of daylight.

In today's housing market, together with the proximity of popular primary schools, it is highly likely that the ground floor flat would be occupied by one or more adults with young children.

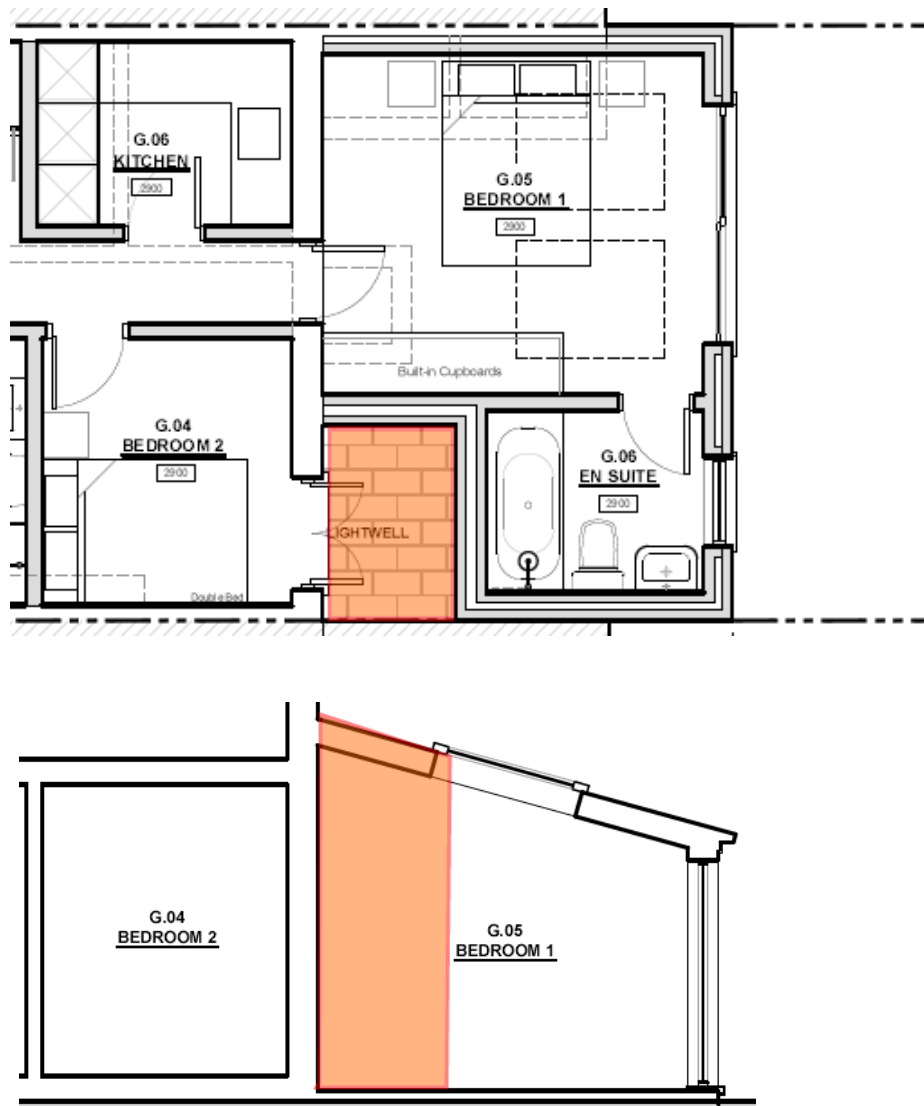
It is probable that young children will be accommodated in the second bedroom.

The construction of an en suite bathroom for the master bedroom in front of the existing external doors of the second bedroom will prevent the children from having access to the garden, as it is extremely unlikely that the adults will permit them to access the garden via the master bedroom.

EFRA OBJECTION TO PLANNING APPLICATION P/2014/4042 - 12 OVERDALE ROAD

The en suite bathroom is in the wrong place and the second bedroom should have direct access to the garden.

The orange highlighting on the following extracts from the application plans show the location of the lightwell and the height of the structure in front of it.



This proposal fails to comply with both the London Plan and Ealing planning policies. We draw your attention to the following.

Ealing's Development Management DPD sets out requirements for "good levels of daylight and sunlight" in Policy 7B.A.b.

Ealing's Development Management DPD also states in Local Policy 3.5.F that:

"Residential development in Ealing . . . should be implemented according to the detailed provisions of the London Housing Design Guide and the London Housing SPG."

Standard 5.5.1 on page 72 of the London Plan Housing SPG requires:

"Glazing to all habitable rooms should be not less than 20% of the internal floor area of the room."

We note that the applicant has chosen not to provide any supporting statement and/or calculations of the amount of daylight which will be able to penetrate into this internal bedroom. The configuration of the deep lightwell suggests that it will be impossible for sunlight to penetrate any part of the internal bedroom.

We draw your attention to the relevant tests set out in and used by specialist consultants in their planning submissions:

Building Research Establishment Site Layout Planning for Daylight and Sunlight, 2011, and
British Standard BS 8206

We therefore believe that the application should be refused until such time as the applicant is able to satisfactorily demonstrate that adequate natural light and sunlight is able to reach the internal areas of the rear ground floor bedroom.

7 Ground Floor Rear Extension

The applicant is seeking to construct a rear ground floor extension which will project outwards into the rear garden for more than the 3 metres specified in Ealing's SPD 4 Residential Extensions.

This would result in the proposed extension projecting further into the rear garden than the extensions of the neighbouring properties, which were constructed in accordance with SPD 4.

In addition to the loss of amenity to the neighbouring residents which would result from an extension of more than 3 metres at 12 Overdale Road, which is clearly shown in the submitted proposed ground floor plans, we are also concerned about its implications for the future residents of the development.

The proposal to divide 12 Overdale Road into two homes will increase the number of residents on the site and increase the need for garden amenity space. Any reduction in the garden footprint would therefore be highly undesirable and provides a further reason as to why the projection of the rear ground floor extension should be limited to 3 metres.

8 Parking

Overdale Road is located close to Northfields Underground Station and, despite the existence of a CPZ, is subject to considerable parking stress. The houses have shallow front gardens and all residents are reliant on on-street car parking.

The proposal to divide a family home into two units can be expected to exacerbate that parking stress.

The possibility that each unit could be occupied by up to four adults could result in up to eight car users. The plans show bed spaces for eight persons.

This quantum of additional car users would place an unacceptable pressure on Overdale Road and the neighbouring streets.

We therefore request that the developer is required to sign a legal agreement preventing all future residents from acquiring CPZ parking rights.

9 Conclusion

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

Yours Sincerely

James Guest

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

Attachment: Garden Space extract from Ealing Development Management DPD

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.

Northolt Greenford Perivale
Adopted Development Management
Development Plan Document
Rough Edit Version Hanwell Ealing
Southall West Ealing

