



**Please reply to:**

34 Wellington Road  
Northfields  
Ealing  
W5 4UH

Neill Collins  
Planning Services  
Ealing Council  
Perceval House  
14-16 Uxbridge Road  
Ealing  
W5 2HL

18<sup>th</sup> March 2013

Dear Mr Collins,

**Planning Application P/2013/0571**  
**Construction of 3 Storey House facing Chandos Avenue**  
**to the rear of 176 South Ealing Road W5 4RJ**

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. Chandos Avenue forms part of our membership area and contains the homes of a number of our members.

While EFRA wishes to support proportionate and appropriate infill housing development, we have extensive and serious concerns over many aspects of this application. These can be summarised as the development's:

- adverse impact on the character and appearance of the surrounding area,
- adverse impact on the amenity and living conditions of the residents of Chandos Avenue, and
- unsatisfactory living conditions for the occupiers of the development.

These concerns are set out below.

## 2 Local Character

Chandos Avenue is exclusively residential in use. Its two storey Edwardian housing is set back behind generous front gardens. None of the houses have constructions forward of the building line. This set-back of the building line is a key feature in defining the character of the road.

The original front slope of the roofs has been retained throughout the road and none of the houses has added dormers to their front slopes.

The facades of the houses incorporate and retain a high degree of period detailing.

The character of the road is further enhanced by a large number of mature pavement edge trees, many of which date from the road's initial construction.

### **View of Chandos Avenue looking West from outside the application site**

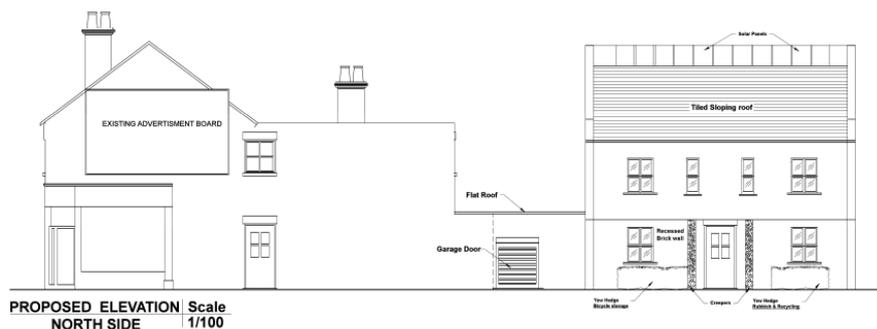


Source: Google Street View

## 3 Application Site

While the site is described as the rear of 176 South Ealing Road, the proposed house will be separated from the existing building and will exclusively face onto and be accessed from the residential side street of Chandos Avenue.

### **Chandos Avenue elevation of proposed house**



Source: Application documents

### 3.1 Relationship of proposed house to existing housing in Chandos Avenue

The western side of the proposed house will be separated from 1 & 1A Chandos Avenue by a narrow alley, as noted in paragraph 5.1 of the applicant's Design and Access Statement. The narrowness of this alley is evidenced by the photograph below.

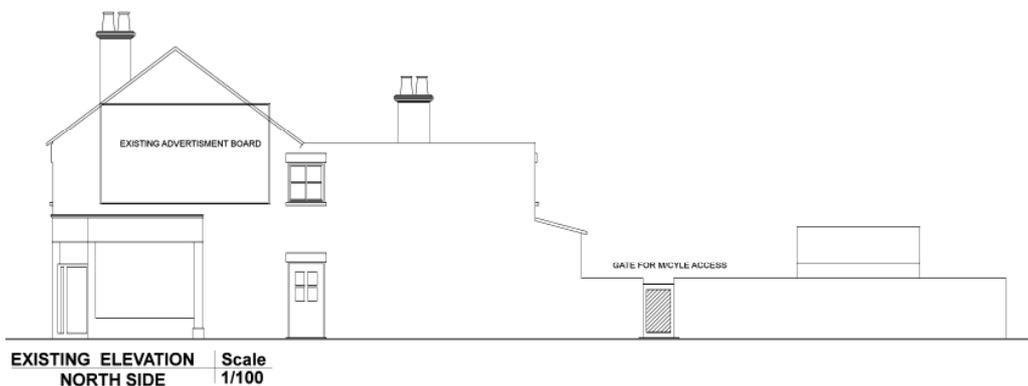
The proposed house will be closer to 1 & 1A Chandos Avenue than to the rear of 176 South Ealing Road.

The relationship of the proposed house to 1 & 1A Chandos Avenue will therefore be a matter of particular importance. It is therefore a matter of some concern that the applicant has chosen not to provide an elevation for the Chandos Avenue frontage which extends to include 1 & 1A Chandos Avenue.

### 3.2 Existing use and configuration of yard to the rear of 176 South Ealing Road

When compared to the following photograph, it will be noted that the location of the corrugated shed is incorrect and that its height has been exaggerated.

**Existing Chandos Avenue Elevation**



Source: Application documents



Source: EFRA photo

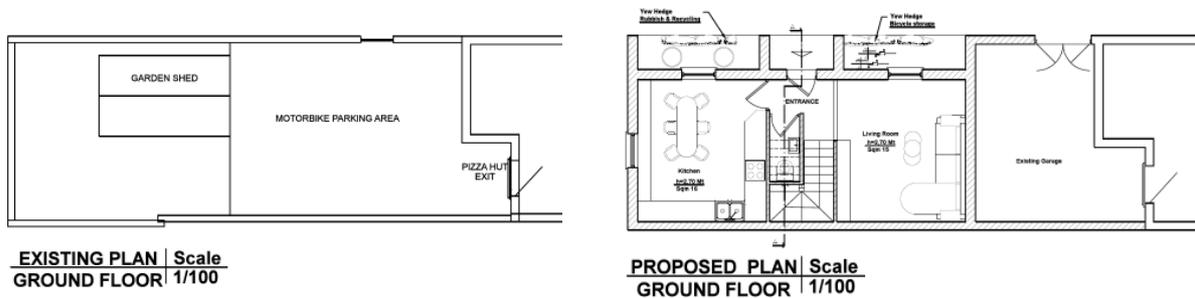
It will be noted that the shed is located as far away as possible from 1 & 1A Chandos Avenue and that it barely exceeds the height of the boundary wall. The existing building on the rear yard is therefore far less imposing on Chandos Avenue than implied in the application.

While paragraph 5.1 of the Design and Access Statement claims that the shed is unused, it was observed from the open pavement gate on Sunday 17<sup>th</sup> March 2013 that it is in active use providing storage for the pizza restaurant. The application fails to indicate where this storage will be relocated.

### **3.3 Garage**

We note that the application includes the roofing over the open yard currently used for the storage of pizza delivery motorbikes.

#### **Pizza delivery motorbike parking area**



Source: Application documents

A significant reduction in the area allocated to motorbike parking appears to be proposed. This needs to be considered along with the deletion of the shed currently used for pizza restaurant storage.

We therefore assume that none of the proposed garage area will be available to provide off-street parking for the residents of the proposed house. If some or all of this area was to be exclusively reserved for parking by the house's residents, we would suggest that this should be recorded by means of a planning condition.

## **4 Application and Local Character**

### **4.1 Relationship of proposed house to Chandos Avenue building line**

We note that the proposal is to build forward to the pavement edge and significantly forward of the hundred year old, and still intact, Chandos Avenue building line. The relationship of the proposed house to the existing houses in Chandos Avenue is shown by the following shaded block plan.

**Shaded Block Plan of site of proposed house**



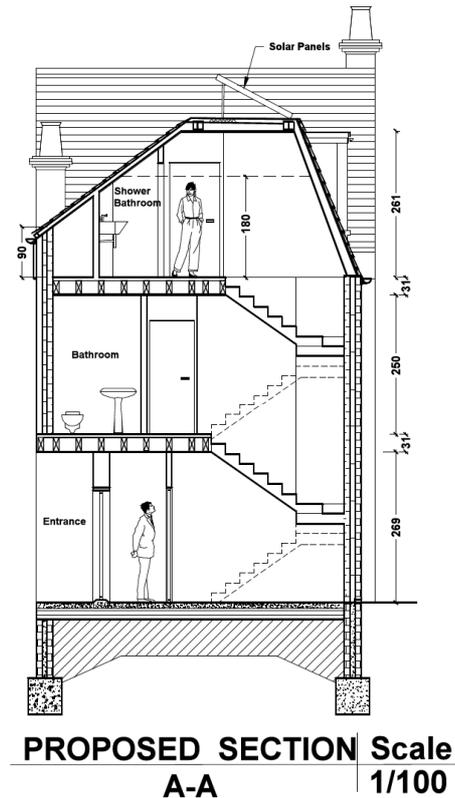
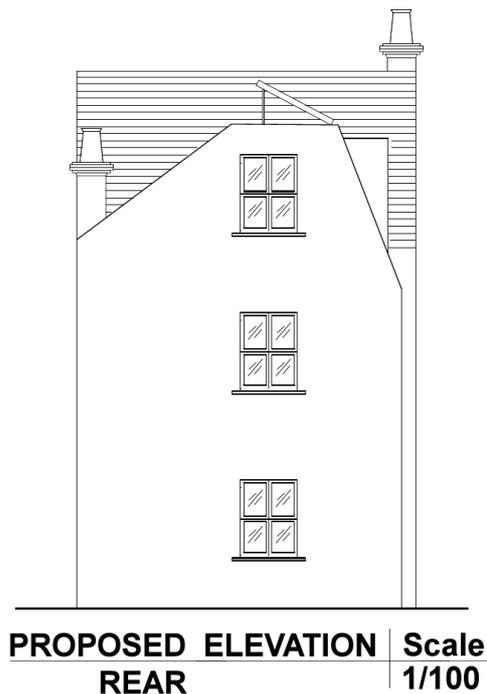
Source: Application documents

**Western end of proposed house site,  
and its relationship to the front garden of 1 & 1A Chandos Avenue**



Source: Google Street View

**Western elevation of proposed house,  
facing front gardens on the south side of Chandos Avenue**



Source: Application documents

It appears that the Chandos Avenue building line will align with the central vertical glazing bar of the proposed side windows, and the majority of the proposed building will be forward of the building line.

The exact position of the Chandos Avenue building line would have been clarified if the applicant had chosen to submit a ground floor plan which extended to include 1 & 1A Chandos Avenue.

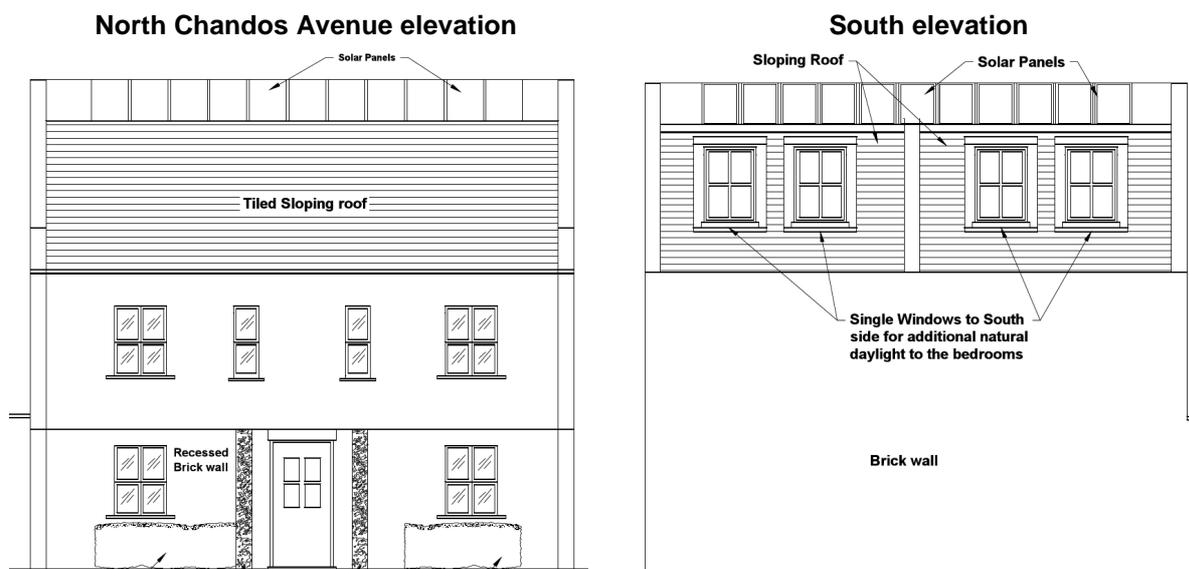
**4.2 Height of proposed house at pavement edge**

There appears to be an inconsistency in the submitted drawings over the vertical height of the pavement facade.

According to the western 'rear' elevation, reproduced above, the Chandos Avenue facade will be extended vertically by 90 centimetres above the second floor level. It will be seen from the above extracts that the eaves of the front of the building facing Chandos Avenue (north elevation) are above the height of the eaves facing the rear yard of 178 South Ealing Road (south elevation).

Unfortunately, this differential in eaves height is not evidenced on the scale drawings of the north and south elevations. Both of which show the roof slope starting at second floor height.

### Comparison of Eave Heights



Source: Application documents

We therefore suggest that the Chandos Avenue (north) elevation is misleading in that it fails to include the vertical extension of the front facade above second floor level.

In paragraph 7.2 of the Design and Access Statement, the applicant states that the application, *“seeks to complete the row of houses in Chandos Avenue in a congruous way”*.

As noted above, all the houses in Chandos Avenue have a building line set back behind front gardens. None of the existing houses have encroached onto their front gardens.

For the applicant to propose to construct a building which will be more than two storeys high at the pavement edge, and which will be visible for much of the length of Chandos Avenue, cannot be construed as respecting the long established local character of this residential side street.

The proposal is incongruous and unacceptable. Its extremely close proximity to the end of the Edwardian terrace would be particularly damaging to the character of the road. It would, in effect, create a canyon when looking westward along Chandos Avenue.

The claim in paragraph 8.2 of the Design and Access Statement that, *“the massing is set back from the street by 1 metre.”* is misleading. While it is proposed to recess the ground floor front facade, the more visually prominent western facade facing the neighbouring front gardens, and which will be visible from much of Chandos Avenue, will be built forward to the pavement edge. The above elevation and section from the application clarify this matter.

We would also point out that there is no precedent for the proposed recessed ground floor ‘undercroft’, with its adverse implications for the penetration of natural light into the ground floor rooms, in Chandos Avenue. As a design feature it is out of character in the local context.

#### 4.3 Height of proposed house compared to the Chandos Avenue building line

In addition to the above concerns, it should be noted that the maximum height of the proposed three storey house will be aligned with the two storey high front facades of the neighbouring Edwardian houses.

This will add to the unacceptable massing of the proposed development when compared to the neighbouring Edwardian houses.

#### 4.4 Relative height of proposed house and neighbouring houses

It has been pointed out to us that the front eaves height and the roof height of the proposed house are likely to be above those of the neighbouring Edwardian terrace ending at 1 & 1A Chandos Avenue. This increase from two to three storeys would equate to a fifty percent increase in height at the established building line.

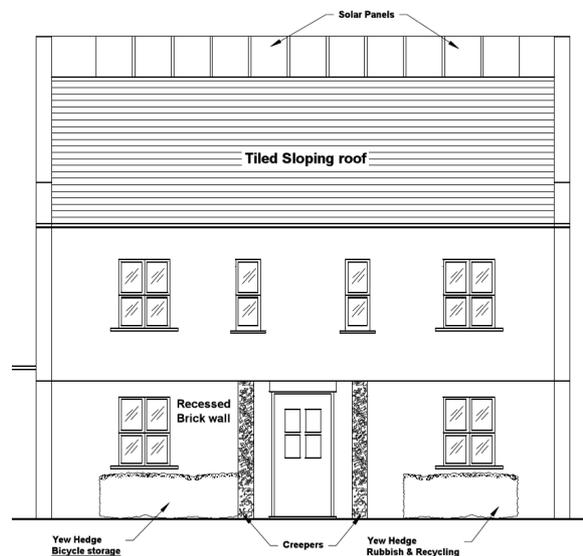
We believe this should be checked and regret the decision of the applicant to fail to submit scaled floor plans and elevations which included 1 & 1A Chandos Avenue.

The claim in paragraph 8.1 of the Design and Access Statement that, *“The scale, proportion, and height are subservient to that of the surrounding houses.”* is not supported by an examination of the application documents.

#### 4.5 Solar Panels

We are concerned at the visual impact from Chandos Avenue of the proposed roof mounted solar panels.

#### Solar Panels on northern Chandos Avenue frontage



Source: Application documents

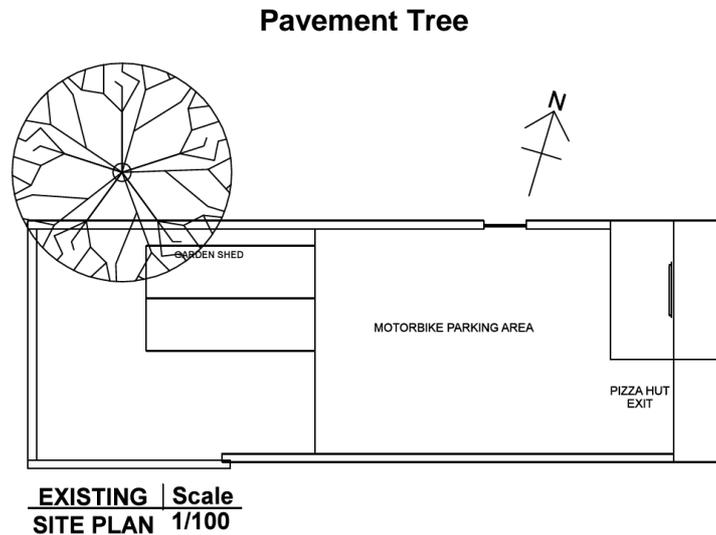
These panels will raise the height of the proposed building to that of the ridge line of the buildings facing South Ealing Road.

In the absence of an elevation we are unable to be certain, but it seems extremely likely that the solar panels will raise the height of the proposed building to above that of the central roof ridge of 1 & 1A Chandos Avenue.

It should be remembered that the maximum height of the proposed building will be aligned alongside the two storey height of the front eaves of 1 & 1A Chandos Avenue, and the visual impact of the solar panels will be pronounced.

#### 4.6 Mature Pavement Tree

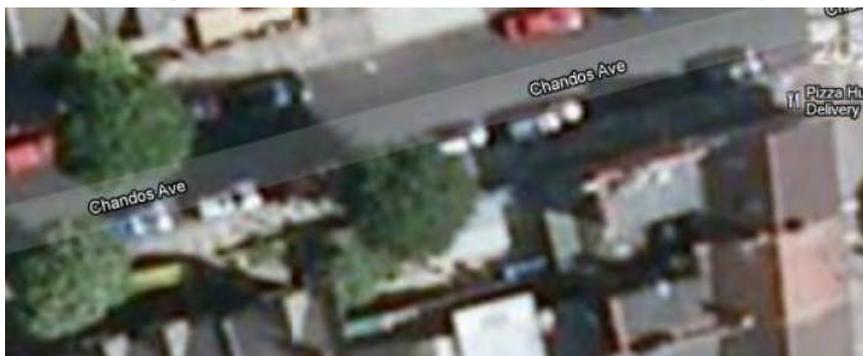
The 'existing' plans record the existence of a tree at the pavement edge in front of the proposed house.



Source: Application documents

The location of the tree appears to have been recorded on the drawing as too far to the west and shows an insufficient canopy, when compared to the following Google aerial photo. The location of the tree is also shown in the photograph in section 3.2 above.

#### Google aerial photo of tree location and canopy



Source: aerial photo

We are concerned that there is no reference to the tree in the 'proposed' floor plans or elevations. Nor can we locate any mention of the pavement tree in the Design and Access Statement.

The implication is that this mature tree will be felled.

We are surprised that the applicant has chosen not to submit an arboricultural statement.

Mature pavement trees are an integral and highly valued component of the local character of our neighbourhood. We therefore urge the Council to ensure that this tree is retained.

## **5 Policy and Local Character**

We believe the proposal to build forward of the Chandos Avenue building line and taller than the two storey front eaves height of the existing housing building line is in conflict with London and Ealing planning policies, and draw you attention to the following.

### **5.1 London Plan.**

We draw your attention to London Plan Policy 7.4 Local Character, and in particular the policies contained in section B, sub-sections a to e.

### **5.2 Ealing's Unitary Development Plan (UDP)**

The Council's UDP contains the following urban design criteria for developments:

*“Appropriate **Height and Scale**, which should be in scale with adjoining buildings. Buildings should relate well to those it adjoins as well as the overall street scene.”*  
(UDP Table 4 A ii)

*“**High Quality Architecture** should reflect the local character in townscape and/or landscape terms by responding to and reinforcing locally distinctive patterns of development.”* (UDP Table 4 A iii)

We therefore believe that any development exclusively facing onto Chandos Avenue should reflect the established, and still integral, character of the Edwardian housing in Chandos Avenue.

### **5.3 Ealing's draft Development Management DPD**

This draft document, which is awaiting it's public examination, embeds London Plan policy 7.4, see above, into Ealing's Development Management DPD. It further extends the London Plan policy with a local variation (i.e. addition) which requires:

*“development in Ealing's existing built areas should complement their:*

- a street sequence,*
- b building pattern,*
- c scale,*
- d material,*
- e detailing”*

We therefore suggest that the proposal to build a residential building forward of, and taller than, the established building line of the existing Edwardian housing in Chandos Avenue would fail to comply with this emerging Ealing policy.

## **6 Overlooking**

We are concerned at the potential which exists for overlooking.

We note that, because of the proposed building's footprint, that windows are positioned on the boundaries of the site and, in particular draw your attention to those on the north elevation facing: 2 & 2A Chandos Avenue, those on the west elevation facing the front of the

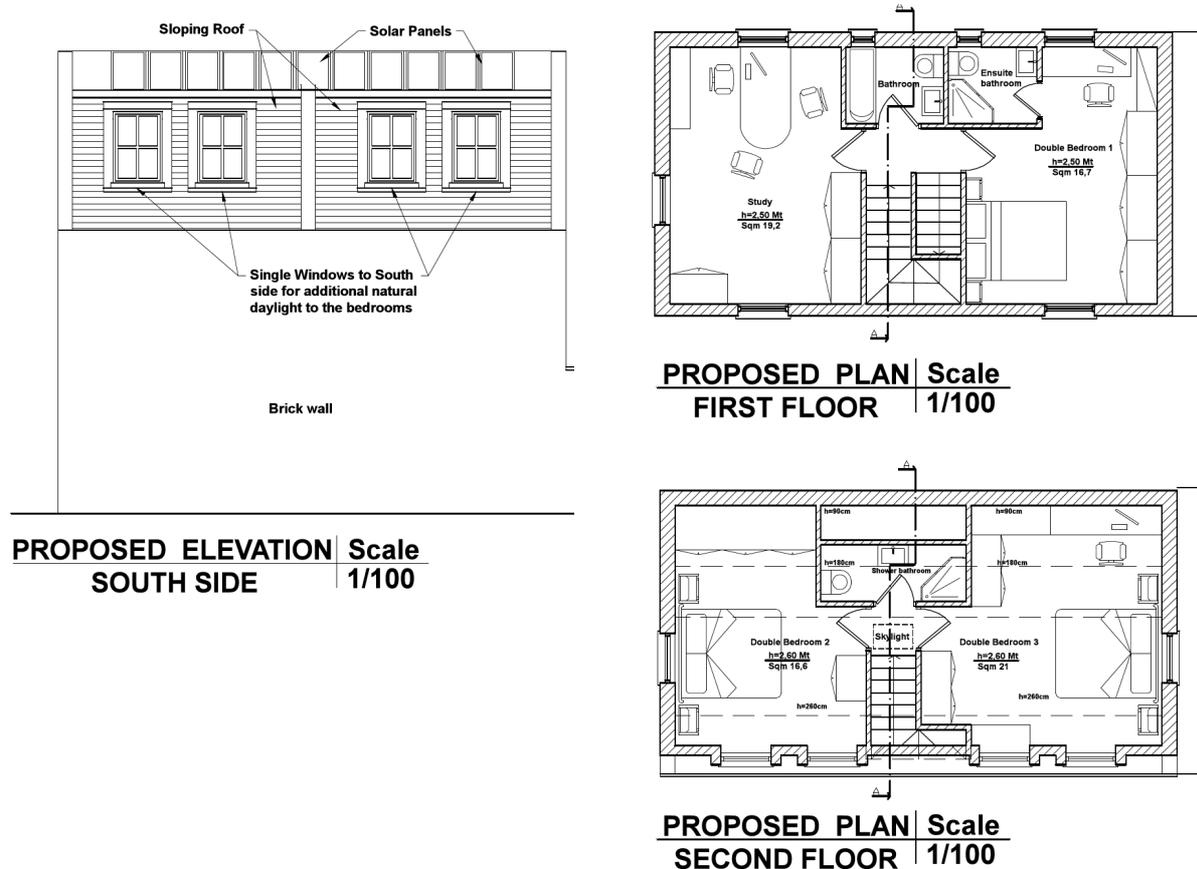
# EFRA OBJECTION TO CHANDOS AVENUE PLANNING APPLICATION P/2013/0571

houses on the south side of Chandos Avenue, and the second floor windows on the south elevation which overlook the neighbouring properties.

We also draw your attention to an apparent inconsistency between the windows shown on the proposed elevations and proposed floor plans.

The south elevation shown in the extract below only contains overlooking windows on the boundary line at second floor level, while the floor plans show south facing windows at both first and second floor level.

## Inconsistency as to existence of First Floor south facing windows



Source: Application documents

We ask you to review the location of all windows and to consider implementing a planning condition requiring them to be both obscure glazed and non-opening where this would be appropriate, to protect the amenity of both the surrounding residents and/or the occupiers of the proposed development.

## 7 Designing out Crime

We question the appropriateness of the ground floor window on the western elevation as this will face directly onto, and potentially will open into, the side alley.

This appears to provide burglars with easy access to the building and we suggest that crime prevention guidance is sought before the location of this window is approved.

We draw your attention to London Plan policy 7.3, in particular paragraph b, and policy 7.3.C of Ealing’s pre-examination Development Management DPD. Guidance is also contained in Ealing’s SPG 8 Safer Ealing.

## **8 Parking**

Chandos Avenue is subject to exceptional parking stress. This is exacerbated by its one-way operation which means that many residents have to make many lengthy circuits of the local road network in an attempt to find a parking space within a reasonable distance of their home.

We are concerned that the absence of garden or out-door space will mean that families with young children are most unlikely to occupy the proposed building. It seems far more likely that the house will operate as a house-share occupied by a number of adults.

The configuration of the house with three statement double bedrooms, and a study which is the same size as a double bedroom, makes it likely that the house will be tenanted by up to eight adults.

This is likely to result in multiple car ownership and further pressure on the already shortage of on-street car parking spaces in Chandos Avenue.

As noted above, according to the plans the proposed reconstructed garage will be retained for the exclusive use of the pizza delivery motorbikes, and no off-road parking will be provided for the residents of the proposed house.

We therefore ask that a legal condition is imposed preventing future occupants of the house from applying for car parking permits.

## **9 Amenity of Future Occupiers**

We are concerned that the internal design of the proposed house will fail to comply with minimum planning standards in a number of instances.

### **9.1 Potential occupants**

The potential number of occupants, according to the application documents, is summarised on the following table.

		<b><u>Occupants</u></b>	<b><u>sqm</u></b>
Bedroom 3	2 <sup>nd</sup> Floor <sup>(1)</sup>	2	21.0 <sup>(1)</sup>
Bedroom 2	2 <sup>nd</sup> Floor <sup>(1)</sup>	2	16.6 <sup>(1)</sup>
Bedroom 1	1 <sup>st</sup> Floor	2	16.7
		<b>6</b>	<b>54.3</b>
Study (used as bedroom)	1 <sup>st</sup> Floor	2	19.2
		<b>8</b>	<b>73.5</b>
Living Room (used as bedroom)	Ground Floor	2	15.0
<b>Totals</b>		<b>10</b>	<b>88.5</b>

Note (1) measured at 1.8m headroom, not 2.8m as indicated on floor plan

Source: Application documents

## **9.2 Internal floor area**

The applicant has not provided Gross Internal Area (GIA) measurements for the proposed building.

The GIA appears to fail to achieve the minimum requirements set out for six and eight bed three storey houses set out in the London Plan and in Annex 4 (page 201) of the London Plan Housing SPG.

The claimed gross floor area in paragraph 6.3 of the Design and Access Statement does not appear to have been adequately adjusted for the external ground floor 'undercroft' and that part of the second floor which fails to meet Ealing Council's minimum headroom requirement of 2.5m.

We therefore ask that detailed GIA measurements are taken and that the total GIA is compared to the London Plan minimum requirements for both six and eight person three storey houses.

## **9.3 Ceiling heights**

Ealing's local variation (addition) to London Plan policy 3.5 requires: *"a minimum of 2.5m between finished floor level and finished ceiling level."*

We have checked the sqm measurements shown on the plan drawings for the second floor bedrooms and it appears that the areas measurements shown are based on the 180cm headroom line and not the 260cm headroom line as claimed. The useable space appears to be materially less than that indicated in the totals on the plans for these two bedrooms.

We ask that the headroom clearance in the two second floor bedrooms is independently reviewed.

## **9.4 Living room**

The London Plan Housing SPG states that: *"Dwellings for five people or more should be capable of having two living spaces, for example a living room and a kitchen-dining room."* (Standard 4.4.3 on page 66).

We are extremely concerned that if, as seems likely, the proposed house was to become a 'flat share', then the Living Room would be used as an additional double bedroom.

We therefore ask that any planning approval is conditioned to require the Living Room to be exclusively used as such.

## **9.5 Private open space**

Both the London Plan and Ealing's local policies require new developments to include private open space. The expectation is that this will take the form of private gardens in the case of new houses.

A major defect in the current application is the lack of any outdoor private open space. In addition, the house will occupy an enclosed area which should be available for use as open space by the residents of the existing first and second floor flat above 176 South Ealing Road.

We draw your attention to Baseline Standard 4.10.1 on page 69 of the London Plan Housing SPG which requires 5sqm of private open space for the first two occupants and additional 1sqm for each additional occupant. For an 8 bed space house, assuming the first floor study will be used as a double bedroom, this would necessitate a minimum of 11sqm of outdoor private amenity space.

The table on page 48 of Ealing's examination version of its Development Management DPD requires new houses to have both Garden Space and Children's Play Space. The table also specifies a minimum requirement of 50/75 sq. m per unit.

Ealing's SPG 13 Garden Space sets out the minimum requirements under the current UDP. It states in paragraph 1:

*"Each new dwelling should have a private usable garden space of no less than 50 sqm for a house with under 5 rooms and at least 75 sqm for a larger house."*

We note that the proposed house will contain six rooms and therefore should comply with the higher 75 sqm threshold.

The issue of outdoor amenity space is particularly important as its existence or absence will be a major factor in determining if the house will be occupied by a family with children or be shared by potentially up to eight adult lodgers.

## **9.6 Lifetime Homes**

We cannot locate any reference to lifetime homes requirements in the application documents.

We draw your attention to the Baseline Standards set out on pages 66 and 67 of the London Plan Housing SPG including the requirement 4.6.2 that the ground floor WC should be wheelchair accessible as a minimum.

Ealing guidance is contained in SPG 7 Accessible Ealing.

## **10 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 character of the local neighbourhood and on amenity of existing and future residents.

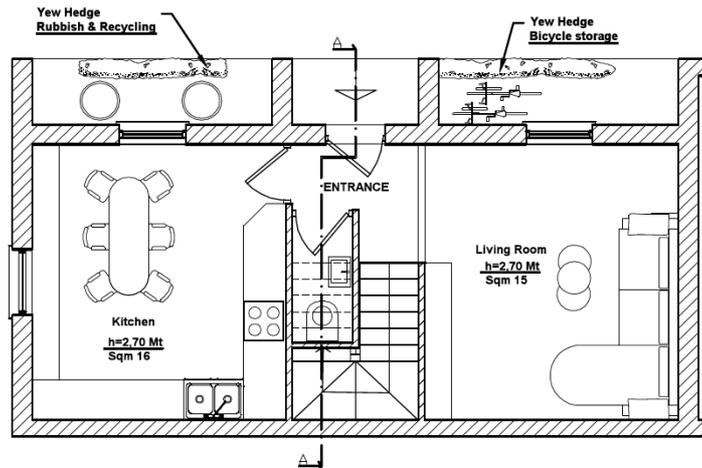
For the reasons set out above, and in the interests of the human rights of the neighbouring residents, we request that this application is unconditionally refused.

Yours Sincerely

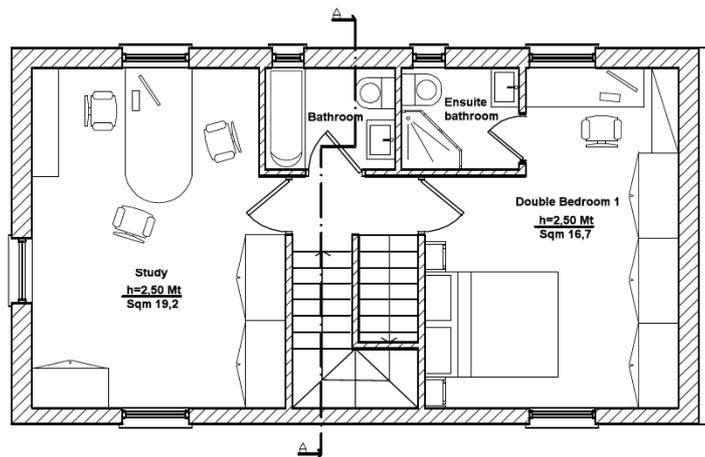
James Guest

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

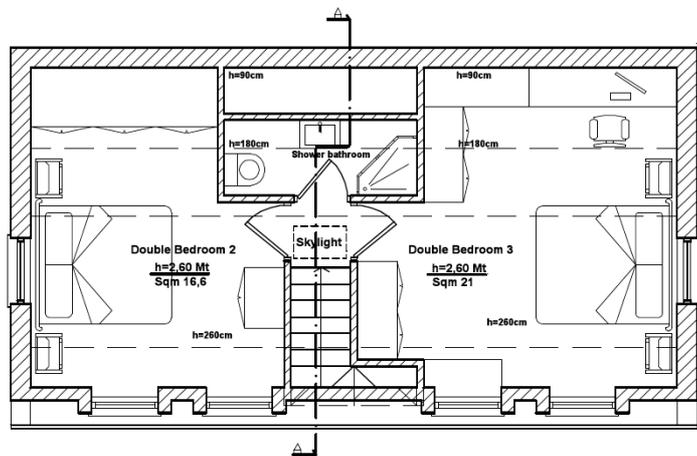
**Enlargements of Proposed Floor Plans**



**PROPOSED PLAN | Scale**  
**GROUND FLOOR | 1/100**



**PROPOSED PLAN | Scale**  
**FIRST FLOOR | 1/100**



**PROPOSED PLAN | Scale**  
**SECOND FLOOR | 1/100**