

Ealing Civic Society

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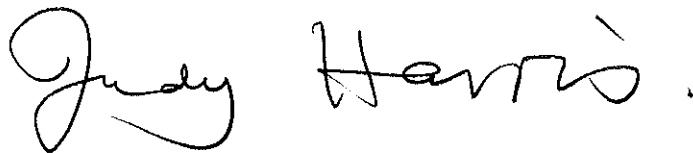
February 10 2006

Planning Policy
Ealing Council
Perceval House
Ealing W5

Dear Dick

Consultation on SPD

I attach Civic Society Comments on most of the SPDs. Bob Gurd will provide comments on the remaining ones. I understand that today is the last day for comments. I hope that it will be all right if these are E-mailed over the weekend



Judy Harris

Hon Secretary

Comments on SPD 1,2,3,4 & 6 by Ealing Civic Society

SPD1 Affordable Housing.

1 - para 2.1

The Council has agreed recently to increase target figures for housing from 650 homes per year to 915 per year (Gazette 3.3.06). 50% are required to be affordable. How can the planning process ensure that this enormous provision is of satisfactory quality and that all residents have access to community facilities, schools, parks and opportunities for local employment. The recently adopted UDP will be obsolete. Where will this additional population be accommodated?

2 - para 2.6

Policy 5.5 requires more than good design. Affordable housing should not be substandard. It should have private amenity space, adequate play space for children, an attractive outlook, incorporate green principles etc. The aim should be sustainable development not a quick fix for housing need. All the policy points should be included in the text

3 para 4.16C

Sole emphasis should not be on affordable housing. If it is the primary objective on all sites, the community will lose employment sites, community facilities, and open space deficiency will never be rectified

SPD2 -Community Facilities

This draft needs editing. The civic society object to the following:

1 The definition (P.17) does not include recreation and open space yet para 5.4 refers to this topic but does not deal with the need for new Public Open Space. Saved policy 3.4 is referred to as preventing the loss of public or community open space but it also requires new open space where there is a deficiency. Private amenity space is a requirement of the UDP yet high density development is allowed with inadequate private amenity space in areas of open space deficiency. Public and private open space is essential Both text and social impact statement should acknowledge this. If the site is too small to provide an area of Local Park, it should provide a commuted payment towards the purchase of POS if it is in an area of deficiency or for park improvements elsewhere. Parks and Countryside should be a consultee. Lack of children's play space must have an undesirable social impact on any development because children will find places which may be dangerous to them or cause annoyance to residents.

2 P17 What is this wide range of Guidance that is available? Surely more of it should be in SPD2. With affordable housing the prime objective for planning obligations on any site, how can the requirement for a community facility be achieved unless it is supported by incorporation in this document and subject to consultation. It will be unenforceable through planning obligations otherwise.

3 Para 2.1- It is very expensive for community groups to find places to meet. The Council demands high rents per hour for such accommodation. Public Houses with meeting rooms are being replaced by flats/restaurants and there is a strong demand for existing leisure facilities/ halls/religious buildings to be used as churches, mosques, temples, flats and offices.

The implications that one community facility is as good as another in the P17 definition leads to loss of important facilities eg former Lido Cinema now has community offices instead of a leisure facility. Shackleton Hall, Southall is to be demolished and replaced by a health centre. The social impact statement is welcomed. But has little force- for example it is not clear on what basis cultural services recommendations will be made on estimated number of places needed (Table 3 no 13)

Also the cumulative impact of small schemes means that local facilities become more expensive or overused and residents need to travel some distance to alternatives. This impact cannot be assessed through consultations on individual planning applications.

SDP3- Sustainable Transport

1 Low Car Housing- Policy 9.8 is referred to as an adopted Udp policy. Other SDPs use the term 'saved'. Which is correct? What evidence is there with any planning application that car ownership and use will be low enough to justify limited parking spaces. Schemes that have commented on usually provide parking for open market customers and bicycle spaces for affordable housing residents. In practice key workers in affordable housing who work unsocial hours may have a greater need for regular car use. Some workers need to take a van home for an early start in the morning. Even if an equal division of car spaces is achieved as suggested in the text, the arrangements for low car housing seems a recipe for conflict and could lead to hard to let dwellings. It is naive to assume there will be no impact on local street parking because there are so many ways that residents not allowed parking permits or a private parking space could park cars in the locality:

- a- Park their vehicle beyond the parking zone. This already happens for daytime parking zones.
- b- use a private space provided for another flat and pay for that owner's parking permit in the street.
- c - park overnight in the street when no residents permit is needed and use the car for journey to work rather than use public transport during the day.

To avoid b) no residents' street parking permits should be allowed for any address in the low car housing.

To avoid c) a parking zone is needed that will require night time supervision. This would be expensive to manage and unpopular with existing residents with visitors at evenings and weekends.

What happens when the disabled drivers living in or visiting the development exceed the number of disabled parking places? There is no flexibility as in a normal housing scheme. Where do visitors park?

2 City Car Clubs

These seem a good idea but evidence is needed that they are sustainable in the long term. Examples that are not named and operator's expectations are inadequate justification for allowing overdevelopment of sites on the basis that people will share cars. If the developer only subsidises the scheme for 3 years, residents will be left with increased charges as vehicles grow older and some may not drive so a requirement for them to support the scheme is unreasonable. Schemes need to be linked so that there is a holistic view of provision rather than consideration on an individual basis to improve prospects of long term viability.

Ealing has many streets that are at capacity with residents parking at night. Low car housing will make matters worse with problems of service vehicles and fire engines trying to gain access. Local residents will want more front gardens to be paved over to ensure a place to park with resultant loss of amenity, increased loading on surface street drainage and flash flood risk.

The Civic Society strongly object to the provision of car club vehicles spaces being located on the highway as stated in para 3.10. If they are a requirement of the development they should be located within the site, not obscuring visibility, making access for service vehicles more difficult or the journey to school along the pavement more dangerous.

Cross Overs and parking in front gardens

Table 5H has a discrepancy between point 1 and high lighted note at the end.

It is appreciated that it is copied correctly from the UDP but the opportunity should be taken to amend this by inserting in the note after **important to use the right materials** to retain existing trees and hedges'.

Para 4.10

There is no reference to street trees in this list. They should be retained.

Controlled gates should be discouraged. They cause delays in busy roads and make the streets feel less safe for pedestrians. Eg Castlebar Rd is a busy narrow road where some gates take time to open and cause bus delays and traffic jams. It should be noted that gates over a metre require planning permission

SPD 4 Residential Extensions

This is a welcome attempt to clarify the problems of extending dwellings in the borough. There are some points that the Civic Society think should be improved.

- 1- for the tick and cross system to have impact it should be applied to all the drawings,
- 2- Detached and terrace houses also get extended not just semis as in most of the diagrams.
- 3 - the third drawing in fig 4.1 encourages roof detail which may be acceptable at roof level above the second storey but would look out of place on a single storey extension which should be subsidiary to the main building.
- 4 - **Side extensions-dimensions** Please add to 'the single storey extension should follow the depth of the house' - 'and setback at the frontage -see below'.
- 5 - **Position** Second para out of three should not start with 'finally'. Both neighbouring properties need to be taken into account. What is overdominance? does it include taking sunlight and day light?
- 6 - Notes on Fig 4.6 What does Dormer window not spoil?
- 7 - **Dormer Windows**
This section is a little muddled and repetitive. Eg Dormer Windows can **provide** a useful way of **providing**...
- 8 - What dormer window is suitable for the side of a roof. Deleting this sentence is recommended
- 9 - What is a traditional dormer? Sentence should say 'If a dormer window is acceptable on a particular roof slope in a conservation area, it should be in keeping with the style of the building'. You do deal with this point under conservation areas so perhaps it should be deleted.
- 10 - Last 2 sentences on P59 should be edited into one and relocated beside reference to rear and side dormers.
- 11 - **Bungalows**
Fig 9.1 and 9.2 repeat the same point. It gives too much emphasis to front dormers which you discourage above. Please delete 9.1. You could show a more useful rear dormer instead.
- 12 - **Hard Surfacing**
Reference to planning permission is incorrect. Either copy from SDP3 or cross reference.

Please add Death of trees and hedges because water is diverted from subsoil. This is something many householders do not think of when they pave their front garden

- 13 - The problem of our Victorian drainage system is overloading not just creaking. Sewerage works capacity is inadequate when it rains heavily.

14 - Conservation areas

Surely Conservation Officer's time should not be used to check if a property is listed or in a conservation area. They are very busy and this is routine checking. Another name should be quoted

- 15 - Much of this is repetition of earlier pages. There are even references to conservation areas earlier. Why not make cross references from those earlier ones and retain this as design in conservation areas.

16 - Roof Extensions 3rd point

Dormer windows should be of traditional design' should be replaced by 'If dormer windows are appropriate for the roof they should reflect the design of the house. Problems can arise in making exact replicas because building regulations require thicker insulation which alters proportions'.

17 - Porches

Replace ' in other situations by 'Where they are acceptable the design'... This clarifies that it is not always acceptable.

18 - Front boundary walls

Add to first point 'Where hedges and fences are part of the street scene they should be retained to maintain the local character' because not all conservation areas are Victorian. resident may think they are improving their property by replacing a hedge by a wall.

SPD6 Twyford Avenue Community Open Space

- 1 - This is full of interesting information about the history of the site. Editing is needed to make future policies stand out more clearly.

2 - Vision for the future

It would clarify aims and objectives if the policy was quoted and the public open space deficiency maps included for the neighbourhood. The policy emphasises the importance of open character and any development being related to open space use. SPD vision seems to reflect a desire to provide facilities. This raises a very real concern that there will be too many facilities and not enough green space. This emphasis could be used as a loophole to build grandstands and other facilities which are inappropriate for a site surrounded by housing in should definitely be part of the vision. Any unused land could become POS if there were a commuted payment fund available from nearby developments as proposed in comments on community facilities. Is a TPO being prepared ?

- 3 - ii) 2nd para. If the council does not understand the existing facilities on the site perhaps a landuse survey should be carried out before the draft is approved. This para needs additional clarification.

- 4 - 1st para on community access needs editing. eg line 5 ' given that' , line 7 'given that' and last sentence 'different operators' (no 's)