EALING UDP POLICY DELETION CHECKLIST

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Draft by James Guest, Ealing Fields Residents Association

14th November 2011
CHAPTER 4 - URBAN DESIGN

To promote good urban design through planning, so that buildings and spaces are attractive, accessible, safe and consistent with the principles of sustainable development, and that there is proper protection of the Borough, particularly areas and buildings that are of historic and architectural value.

4.1 Design of Development
4.2 Mixed Use
4.3 Inclusive Design - Access for all
4.4 Community Safety
4.5 Landscaping, Tree Protection and Planting
4.6 Statutory Listed Buildings
4.7 Locally Listed Buildings, Buildings with Façade Value and Incidental features
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4.9 Ancient Monuments and Archaeological Interest Areas
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4.12 Light Pollution
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4.14 Television Satellite Dishes, Radio Masts and other Apparatus
### 4.1 Design of Development

**Council Comment:** Superseded by London Plan policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7 & 7.12

**Wording of UDP Policy:**
1. The design of development should be guided by the following principles:
   i) Good Layout;
   ii) Appropriate Height and Scale;
   iii) High Quality Architecture and Character;
   iv) Appropriate Materials;
   v) Sustainability;
   vi) Inclusive Design - Access for all;
   vii) Community Safety;
   viii) Legibility;
   ix) Appropriate Hard and Soft Landscaping;
   x) Adaptability

2. The Council will only approve development that respects current standards of safety, natural light, health, privacy and freedom from traffic nuisance, disturbance or visual intrusion in relation to neighbouring land uses.

3. An Urban Design Statement should be submitted for all significant development proposals within the Borough, particularly those sites that are likely to have a significant impact on the public realm, are sited within an area of character or are major regeneration schemes.

<table>
<thead>
<tr>
<th>Table 4A: Urban Design Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Policy will be tested on the basis of the following considerations:</td>
</tr>
<tr>
<td>i) Good Layout, which should provide a suitable relationship between buildings and spaces and contribute to a visually attractive urban landscape. A good layout will:</td>
</tr>
<tr>
<td>• create a framework of routes and spaces that connect locally and more widely;</td>
</tr>
<tr>
<td>• allow developments, routes and open spaces to relate well to each other;</td>
</tr>
<tr>
<td>• provide ease of movement for all transport modes, whilst affording priority to pedestrians, and then to cyclists and public transport;</td>
</tr>
</tbody>
</table>

**Comments:**

The provisions in UDP Table 4A should be retained until they can be incorporated into the Adopted Development Management DPD.

These detailed provisions provide an essential basis for refusing inappropriate planning applications and defending that decision at a Planning Inquiry.
• consider the arrangement of street blocks, plots and their buildings in a settlement.

ii) Appropriate Height and Scale, which should be in scale with adjoining buildings (for further information relating to high buildings see Table 4B). Buildings should relate well to those it adjoins as well as the overall street scene. This should be done whilst also complying with plot ratio and site coverage standards or with appropriate residential densities (for guidance on the appropriate standards see relevant SPG). (For information relating to residential density see Chapter 5). Local and Strategic views and landmarks (see Sites and Areas Schedule 10.8) will be protected from immediate obstruction from high buildings and any permitted should only be located where they would not adversely affect the vistas and landmarks visible from these viewpoints.

iii) High Quality Architecture should reflect the local character in townscape and/or landscape terms by responding to and reinforcing locally distinctive patterns of development, or on sites or areas lacking a specific local character, and on large sites, high quality designs should be applied in order to create a place with its own identify.

iv) Appropriate Materials that should remain over time visually harmonious and pleasing, functionally safe and appropriate, energy efficient, ecologically sound, durable and easy to maintain.

ev) Sustainability. The Council will encourage the renovation and re-use, rather than the redevelopment of buildings or sites. The Council will also encourage the use of green practices such as passive solar design, energy conservation and recycling facilities. The use of natural light and sunlight for warmth should be maximised. Where possible solar heating or photovoltaic cells, small residential combined heat and power schemes, sunscreens and natural ventilation as alternatives to air conditioning should be incorporated into the design. Measures to conserve and recycle water will be encouraged. Sustainable Urban Drainage Systems (SUDS) will also be sought as part of development to control surface water runoff.

vi) Inclusive Design - Access for all (for full details see policy 4.3).

vii) Community Safety (for full details see policy 4.4).

viii) Legibility. The Council will expect all development to create an environment that has a clear image and is easy to understand. Providing recognisable routes, intersections and landmarks to help people find their way round can help to do this.

ix) Appropriate Hard and Soft Landscaping (for more on soft landscaping see policy 4.5 below). Hard landscaping includes paving and other hard surfaces, as well as signposts
and other infrastructure in the environment (see also 9.5).

x) Adaptability is the principle behind creating a place that can respond easily changing needs.

**Table 4B: High Buildings or Structures**

Applications for high buildings or structures which exceed 20 m (65 ft) in height or which are significantly higher than their surroundings will be carefully considered having particular regard to the following criteria:

i) The building or structure should identify and emphasise a point of civic or visual significance over the whole area from which it will be visible.

ii) The building should very carefully relate to its surroundings and to other high buildings or prominent features in the vicinity.

iii) The site should be sufficiently large to ensure an adequate setting including landscaping.

iv) The amenity and development of surrounding sites should not be impaired, in particular local and strategic views. Vistas and landmarks should not be immediately obstructed. Any building or structure permitted should not mar the skyline or important views (from within or outside the Borough).

v) The building should take account of:
   • the effects of wind turbulence;
   • conserving energy through passive solar design;
   • opportunities for use of solar heat or photo voltaic cells; and
   • the shading effects on surrounding land.

vi) Building will not generally be acceptable on sites in or adjoining Green Belt or Metropolitan Open Land or within Conservation Areas or Areas of Special Character.
### 4.2 Mixed Use

**Related and Subsidiary SPG’s & SPD’s:**

**Council Comment:** Delete.

**Wording of UDP Policy:**

The Council will promote mixed-use development, particularly in town centres and other areas with good public transport accessibility. In other locations the Council may seek a mixture of uses, where this does not conflict with other policies. In all cases the Council will take into account the scale and nature of the proposed development relative to the mix of land uses in the surrounding area.

**Comments:**

How/where is the subject of Mixed Use development addressed?

### 4.3 Inclusive Design - Access for All

**Related and Subsidiary SPG’s & SPD’s:** SPG 7

**Council Comment:** Superseded by policy 7.2 and covered under Building Regs.

**Wording of UDP Policy:**

Development should be accessible to all, and proposals will be expected to provide:

1. Appropriate design of spaces between and around buildings, including parking provision, access points for public and community transport, surface treatment of pavements and pedestrian areas, kerbs and crossing, ramped changes in level, street furniture and sign-posting;

2. Accessible entrances to/exits from buildings, including level or ramped access points, handrails for use by adults and children, entrances which are wide enough for wheelchair users and doors that everyone can use safely;

3. Internal space and layout which allows for accessible reception areas, corridors, toilets, lifts, stairways and the main areas of buildings;

4. Requirements relating to different aspects of disability, including wheelchair use, guide dog use, ambulant disability and sensory impairment (sight or hearing).

**Comments:**

- The wording of UDP policy 4.3 appears more detailed than LP 7.2
- Council spreadsheet proposes saving Ealing SPG 7.
- If SPG 7 Accessible Ealing is to be saved, its “parent” UDP policy will need to be saved.
### 4.4 Community Safety

**Related and Subsidiary SPG’s & SPD’s:** SPG 8  
**Council Comment:** Superseded by policy 7.13  
**Wording of UDP Policy:**  
New development will only be permitted where the layout and design is based on the promotion of a safe and secure environment, including the maximum possible adoption of natural surveillance of public spaces.  
**Comments:**  
Wording of LP 7.13 is very general.  
Council spreadsheet proposes saving Ealing SPG 8.  
If SPG 8 Safer Ealing is to be saved, its “parent” UDP policy will need to be saved.

### 4.5 Landscaping, Tree Protection and Planting

**Related and Subsidiary SPG’s & SPD’s:** SPG 9  
**Council Comment:** Superseded by policy 7.21 & 5.10  
**Wording of UDP Policy:**  
1. The Council will require that a well designed and integrated landscaping scheme, with appropriate longer term maintenance and management will accompany any application. Landscaping schemes should ensure the identification and protection of existing vegetation of value, as well as the planting of new suitable trees and shrubs in appropriate locations.  
2. The Council will continue to make Tree Preservation Orders, particularly where trees are likely to be affected by development, and/or where the trees are particularly visible or are:  
   • Large or healthy specimens;  
   • Part of a group which contributes to the character of the area.  
3. The Council will seek to enhance small open sites for: landscaped sitting areas, children’s play areas and tree planting as appropriate; in shopping and district centres, Major Employment Locations, at Employment Sites and in residential areas.  
**Comments:**  
LP 7.21 does not include the provisions of paragraphs 2 and 3 of Ealing’s UDP policy 4.5  
Council spreadsheet proposes saving Ealing SPG 9.  
If SPG 9 Trees and Development Guidelines is to be saved, its “parent” UDP policy will need to be saved.
## 4.6 Statutory Listed Buildings

**Related and Subsidiary SPG’s & SPD’s:**

**Council Comment:** Superseded by policy 7.4, 7.8, 7.9

**Wording of UDP Policy:**

1. The Council will protect and enhance the character of Statutory Listed Buildings by:
   i) Only permitting the change of use if this would not harm the character or appearance and if a change of use would ensure the care and maintenance of a buildings;
   ii) By refusing demolition unless in exceptional circumstances;
   iii) Not permitting any external or internal alterations to a Listed Building unless there would be no adverse effect on its architectural or historic character.

2. The Council will seek to preserve and enhance the settings of Listed Buildings by assessing the design of development in their vicinity, control over the use of adjacent land, and where appropriate, by the preservation of trees and landscape features within the setting of Listed Buildings and/or adjacent land.

**Comments:**

UDP wording is more detailed than and complementary to that in the LP policies.

The UDP wording should therefore be retained until it has been absorbed into Ealing’s Adopted Development Management DPD.

## 4.7 Locally Listed Buildings, Buildings with Façade Value and Incidental features

**Related and Subsidiary SPG’s & SPD’s:**

**Council Comment:** Superseded by policy 7.4, 7.8, 7.9

**Wording of UDP Policy:**

1. The Council will protect and enhance the character of locally listed buildings, and groups of buildings with façade value. Proposals for demolition and alterations will be discouraged unless alternative use of the building is not viable or the planning benefits for the community outweigh the loss resulting from demolition.

2. The Council may designate additional locally listed buildings that contribute to the local scene or have local historical associations.

3. The Council will also encourage the retention of incidental features in the urban environment that create the particular local character and landscape of the Borough.

**Comments:**

UDP wording is more detailed than and complementary to that in the LP policies.

The UDP wording should therefore be retained until it has been absorbed into Ealing’s Adopted Development Management DPD.
**Table 4C: Selection Criteria – Locally Listed Buildings**

The Council may designate additional Locally Listed Buildings that contribute to the local scene or have local historical associations.

1. **Contributions to the local scene**

**Landmarks**
- a) Ornate corner buildings
- b) Curiosities or individual buildings of merit that are different from the surrounding ones
- c) Buildings too modern for statutory listing
- d) Other features of interest

**Urban Design/ Townscape**
- e) Group/façade value
- f) Architectural/historical unity
- g) Associated landscape
- h) Townscape value

**Architectural interest**
- i) Type of building
- j) Craftsmanship
- k) Design
- l) Building techniques

2. **Local Historical Association**
- m) Social, economic, cultural, military
- n) Famous local people and events

The provisions in UDP Table 4C should be retained until they can be incorporated into the Adopted Development Management DPD.

These detailed provisions provide an essential basis for refusing inappropriate planning applications and defending that decision at a Planning Inquiry.
4.8 Conservation Areas

Related and Subsidiary SPG’s & SPD’s:

Council Comment: Superseded by policy 7.4, 7.8, 7.9

<table>
<thead>
<tr>
<th>Wording of UDP Policy:</th>
<th>Comments:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The Council will preserve or enhance the character and appearance of Conservation Areas and their settings.</td>
<td>Ealing’s Core Strategy and the LP Policies lack the explicit commitment and detail contained in UDP Policy 4.8 and UDP Table 4D.</td>
</tr>
<tr>
<td>2. New development, built or otherwise within or adjacent to the Conservation Area, will be permitted provided that it is well related to the existing character of the area in terms of its historic and architectural quality, and green setting. The Council also requires that any development proposal adhere to the Council’s specific Conservation Area guidelines.</td>
<td>It is therefore recommended that the policy and table are retained until their provisions can be incorporated into an Adopted Development Management DPD.</td>
</tr>
<tr>
<td>3. The Council will refuse planning permission and Conservation Area consent for redevelopment of existing buildings, unless the proposed replacement development will preserve or enhance the character of the Conservation Area. The Council will also, where appropriate, make Article 4 Directions, restricting development rights granted by the General Permitted Development Order.</td>
<td></td>
</tr>
<tr>
<td>4. It is the Council’s intention to create new and extended Conservation Areas in the Borough, in areas which merit this status, having regard to the individual merits of buildings, spaces and other features, and the quality and character of the area as a whole.</td>
<td></td>
</tr>
</tbody>
</table>

Table 4D: Conservation Areas

It is the Council’s intention to create new and extended Conservation Areas in the Borough, provided that the following criteria are met:

1. The area concerned must be the setting for one or more of the following:
   - Listed Buildings, or a group of buildings of good design from any period, especially where they create an attractive townscape;
   - Urban open spaces or historic village greens;
   - Features of historic or archaeological interest including industrial or transport heritage;
   - Landscape features including the water, trees, gardens of value for their plants, wildlife or the amenity of the surrounding area;
• An historic street pattern.
2. The area should have some cohesion of character worthy of preservation; and
3. The benefits of preserving that character must be considered to be greater than the loss of certain permitted development rights, having regard to the financial and resource implications of such action.

### 4.9 Ancient Monuments and Archaeological Interest Areas

<table>
<thead>
<tr>
<th>Related and Subsidiary SPG's &amp; SPD's:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Council Comment:</strong> Superseded by policy 7.4, 7.8, 7.9</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Wording of UDP Policy:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The protection of Scheduled Ancient Monuments and their settings is required by law. Any development affecting such an ancient monument requires an impact evaluation, including an archaeological assessment where appropriate.</td>
</tr>
<tr>
<td>2. It is the Council’s intention to also protect archaeological sites, and any proposal:</td>
</tr>
<tr>
<td>• must provide adequate opportunities for archaeological investigation prior to development;</td>
</tr>
<tr>
<td>• must be carried out in accordance with the British Archaeologists and Developers Liaison Code of Practice.</td>
</tr>
<tr>
<td>3. Where development would adversely affect Archaeological Interest Areas or archaeological remains, the applicant will normally be required to:</td>
</tr>
<tr>
<td>• Modify designs to avoid adverse effects;</td>
</tr>
<tr>
<td>• Design suitable land use and management strategies to safeguard any important remains, with the option to seek an agreement covering access and interpretation arrangements;</td>
</tr>
<tr>
<td>• Preserve in situ: where this is not feasible, appropriate provision for excavation.</td>
</tr>
</tbody>
</table>

| **Comments:** |
### 4.10 Commercial Frontages and Advertising Signs

**Related and Subsidiary SPG’s & SPD’s:**

| Council Comment: | Superseded by policy 7.8 & national regulations |

**Wording of UDP Policy:**

1. Within commercial frontages, the Council will expect appropriate development by:
   
i) requiring high quality design;
   
   ii) encouraging local residents and businesses to contribute to improving their environment and street scene and consulting on the design of environmental improvements;
   
   iii) ensuring proposals for a change of use will, as appropriate, either require the retention of the existing shop window to provide some continuity with the existing frontage or a new frontage that is in keeping with the upper floors and surrounding residential property.

2. The Council will exercise control over the siting and display of advertisements to ensure that the public safety and visual amenity of an area is not adversely affected and will expect compliance with certain criteria.

**TABLE 4E: Siting and Display of Advertisements**

The Council will exercise control over the siting and display of advertisements to ensure that the safety and visual amenity of an area is not adversely affected, and will expect compliance with the following criteria:

- All advertising signs are to be of a design and scale compatible with the surrounding area;
- No shop or shop premises to be used for other purposes will be given permission to display a sign above fascia level and only one projecting box sign will be allowed per fascia;
- No sign will be allowed which adversely affects public safety, including the free flow of traffic; due to its design, siting, luminance or colouring;
- The granting and renewal of consent for advertisement hoarding will be conditional on good standards of presentation, including planting schemes; and

**Comments:**

LP 7.8 does not refer to Commercial Frontages or Advertising Signs.

It is suggested that the provisions of UDP Policy 4.10 and Table 4E should be retained until they can be incorporated into an Adopted Development Management DPD.
- No new signs or other advertisements will be allowed in Green Corridors, Green Belt, Metropolitan Open Land, Sites for Local Nature Conservation or Conservation Areas, or on railway bridges or adjacent to canals.

### 4.11 Noise and Vibration

**Related and Subsidiary SPG’s & SPD’s:** SPG 10  
**Council Comment:** Superseded by policy 7.15

**Wording of UDP Policy:**

1. Development generating noise or vibration will not be permitted where it would cause noise or vibration above acceptable levels, particularly where it would harm existing or proposed noise sensitive development, unless this can be satisfactorily attenuated.

2. Noise-sensitive development will not be permitted where its users would suffer noise above acceptable levels, unless this can be acceptably attenuated.

**Comments:**  
The LP policy refers to “minimising” the adverse impacts of noise, while Ealing’s UDP is more explicit in its reference to “noise or vibration above acceptable levels”. It is suggested that the UDP policy is retained until it can be incorporated into an Adopted Development Management DPD.

### 4.12 Light Pollution

**Related and Subsidiary SPG’s & SPD’s:**  
**Council Comment:** Save

**Wording of UDP Policy:**

The Council will consider applications for floodlighting and illumination in the context of their effect on the quality of life of residents in the locality, and on the following:

- i) the minimisation of possible disturbance of natural habitats for wild life, especially defined sites, areas and protected species;
- ii) the protection or enhancement of buildings of architectural or historic interest, the townscape, landscape, canals and preservation of local and strategic views;
- iii) sustainable energy use - the design should focus light where it is specifically needed by the proposal or to enhance architectural features without damaging listed buildings; and lighting installations should be as unobtrusive as possible and avoid upward spillage into the night sky.

**Comments:**
### 4.13 Mobile Telephone Masts and Apparatus

<table>
<thead>
<tr>
<th>Related and Subsidiary SPG’s &amp; SPD’s:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Council Comment: Delete. Covered by national legislation.</td>
<td></td>
</tr>
</tbody>
</table>

#### Wording of UDP Policy:

The Council will consider applications for mobile telephone masts and apparatus, on the basis that:

- i) a need for the equipment proposed has been demonstrated;
- ii) there would be no harmful visual impact, and any structures or apparatus will be removed when it becomes redundant or the permission expires;
- iii) throughout the period covered by the permission, installations generating electromagnetic fields (EMFs) meet the relevant government or EU guidelines.

#### Comments:

Table 4F: Need for Mobile Telephone Masts or other Apparatus

The Council will require any applicant for telecommunications equipment to demonstrate that:

- a) it has an operational need for the equipment applied for;
- b) it is seeking to install the smallest possible equipment commensurate with the operational need identified;
- c) the proposed location is the least harmful location available in terms of visual impact and health implications;
- d) the proposed design minimises the visual impact of the development;
- e) if the proposal is not for the sharing of existing mast, equipment or site, it is not operationally possible to share any existing mast, equipment or site, or that such sharing would be more harmful to appearance or health;
- f) the scheme, where possible, facilitates future sharing of the mast, equipment or site proposed;
- g) Pre-application consultation has occurred with the relevant body of the school or college (where a mast is proposed to be installed on or near a school or college) and/or other organisations with an interest in the proposed development, such as government organisations.

The provisions in UDP Table 4F should be retained until they can be incorporated into the Adopted Development Management DPD.

These detailed provisions provide an essential basis for refusing inappropriate planning applications and defending that decision at a Planning Inquiry.
organisations and residential groups. The Council will take into account any relevant views expressed.

### 4.14 Television Satellite Dishes, Radio Masts and other Apparatus

**Related and Subsidiary SPG’s & SPD’s:**

**Council Comment:** Delete. Covered by national legislation.

**Wording of UDP Policy:**

1. Where this equipment needs planning permission, proposed development should be:
   - i) As small in size and as few in number as possible;
   - ii) Shared by as many users as possible;
   - iii) Placed as unobtrusively as possible;
   - iv) Located so as not to interfere with the doors or windows of neighbouring property;
   - v) Removed as soon as they are obsolete.

2. The equipment will not be permitted if it would harm the appearance of a building, particularly if this is a Listed Building or in a Conservation Area.

**Comments:**

- It would be helpful to have sight of the national legislation.
- Should the provision about Conservation Areas be retained?
CHAPTER 5 - HOUSING

To increase the quantity of housing in accordance with the agreed strategic minimum target of 9,750 new dwelling units by 2017, ensure its satisfactory quality, and improve choice to meet needs for all residents. Priority will be given to re-using empty property, converting existing buildings, and making best use of previously developed land.

5.1 Housing Supply
5.2 Affordable Housing
5.3 Lifetime Homes and Wheelchair Housing
5.4 Range of Dwelling Sizes and Types
5.5 Residential Design
5.6 Small Dwellings and Flats
5.7 Special Housing
5.8 Accommodation for Travellers
5.9 Extensions and Alterations to private houses and gardens
5.1 Housing Supply

Related and Subsidiary SPG's & SPD's:

Council Comment: Policy previously expired in 2007. Superseded by 3.3, 3.14(b) & (d)

Wording of UDP Policy:
1. The Council will encourage the development of additional dwellings:
   - in residential areas;
   - on suitable sites in shopping centres; and
   - in mixed schemes elsewhere outside the defined residential areas, subject to other policy priorities.
2. Development that would result in the net loss of residential units, or of non self-contained residential accommodation to non-residential uses, will not be permitted, unless this provides accommodation for a community facility needed by residents in the immediate locality.
3. High density residential development may be acceptable in areas with good local services, with good public transport and capacity, and subject to a high standard of urban design. Low density residential proposals of less than 30 units per hectare will not normally be permitted.
4. In addition, the Council will encourage:
   i) conversion schemes in under-occupied dwellings;
   ii) applications for interim use of dwellings earmarked for re-development;
   iii) rehabilitation of vacant residential accommodation above shops;
   iv) use of suitable non-residential property for housing.

Table 5A Guidance on Residential Density

<table>
<thead>
<tr>
<th>High density sites</th>
<th>Predominant Type HR/Ha</th>
<th>U/Ha</th>
<th>Non-family units</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Flats 250 - 350 80 – 120</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Terraced/flats 200 - 300 50 – 110</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Other sites (except backland – see Table 5F))**

<table>
<thead>
<tr>
<th>Predominant Type</th>
<th>HR/Ha</th>
<th>U/Ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-family units</td>
<td>200 - 250</td>
<td>50 - 80</td>
</tr>
<tr>
<td>Family housing</td>
<td>170 - 200</td>
<td>30 – 65</td>
</tr>
</tbody>
</table>

The identification of high density sites will be specified in supplementary guidance relating to the sites in Schedule 10.21 and in other sites to be identified through the plan period. Provided that it is consistent with the policies in the plan, the local planning authority may indicate densities of up to 700 hr/ha on certain sites. (see ‘The London Plan’, Table 4B.1)

### 5.2 Affordable Housing

<table>
<thead>
<tr>
<th>Related and Subsidiary SPG’s &amp; SPD’s:</th>
<th>SPD 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council Comment:</td>
<td>Superseded by 3.11, 3.12, 3.13 &amp; SHLAA</td>
</tr>
</tbody>
</table>

**Wording of UDP Policy:**

1. For development projects which can accommodate 15 or more residential units, or on sites of 0.5 ha or more, the Council will seek 50% of the units on site as affordable housing.

2. The benefits of affordable housing are to be extended to successive as well as initial occupiers. Where the agency is not a Registered Social Landlord, agreement will be reached between the Council and the developer and secured by legal agreement or conditions.

**Comments:**

- ED(C)S 1.2.a
- London Plan to be revised ED 104
- No provision in ED(C)S to implement provision for larger (family?) dwellings- see LP 3.13.B
### 5.3 Lifetime Homes and Wheelchair Housing

<table>
<thead>
<tr>
<th>Related and Subsidiary SPG’s &amp; SPD’s:</th>
<th>SPG 7</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council Comment:</td>
<td>Superseded by 3.8. See also 7.2</td>
</tr>
<tr>
<td><strong>Wording of UDP Policy:</strong></td>
<td></td>
</tr>
<tr>
<td>1. All new residential units created through new development or conversion should be consistent with the Lifetime Homes standards.</td>
<td></td>
</tr>
<tr>
<td>2. In addition, the developer should include a proportion of dwellings (particularly ground floor flats but also those with lifts) to wheelchair standards.</td>
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<tr>
<td>3. On sites of 10 units or more, it is expected that 10% of the units should be to wheelchair standards. On smaller sites, one or more units may be negotiated, depending on local demand.</td>
<td></td>
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<tr>
<td><strong>Comments:</strong></td>
<td></td>
</tr>
<tr>
<td>Where is ED(C)S reference to smaller sites equivalent to the wording of UDP 5.3.3?</td>
<td></td>
</tr>
<tr>
<td>LP 3.8.B.d only refers to ten percent.</td>
<td></td>
</tr>
<tr>
<td>Should the requirement extend to conversions and not just new housing?</td>
<td></td>
</tr>
<tr>
<td>London Housing SPG Awaited – may contain provisions ED 105</td>
<td></td>
</tr>
</tbody>
</table>

#### TABLE 5B  Lifetime Homes and Wheelchair Standards

**Lifetime Homes**

i) The approach to all entrances should be level or gently sloping (not more than 1:20)

ii) All entrances should be illuminated and have level access over the threshold, the main entrance should be covered, and any lifts should be wheelchair accessible;

Inside the home, there should be:

- adequate dimensions for doorways and hallways, kitchens, dining areas and sitting rooms and circulation space;
- sitting room (or family room) at entrance level;
- in houses of two or more storeys, space on the ground floor that can be used as a convenient bed space;
- wheelchair-accessible toilet at entrance level, capable of adaptation for a shower.

iii) The structure of the building should be capable of taking adaptations such as:

- handrails and hoists in appropriate rooms;

This detail is absent from LP.

These provisions should be retained until they can be incorporated in Ealing’s Adopted Development Management DPD?
iv) The bathroom layout should be designated to incorporate ease of access, including from a side approach, to the bath and WC.

v) Habitable rooms with a good outlook and windows low enough for people who are seated to see out.

vi) Fixtures and fittings, which facilitate access for people with disabilities.

vii) Car parking adjacent to the home should be at least 3.3 metres, and preferably 3.6m wide.

viii) The distance from the car parking space to the home should be kept to a minimum and should be level or gently sloping.

**Wheelchair Standards**

Development should be constructed as Lifetime Homes but with the following essential additional requirements:

i) Access to communal and private gardens via level or ramped paths with handrails;

ii) A garage at least wide enough to allow the car door to open fully, and long enough to accommodate those who enter and leave the car from the rear. An integral garage with direct access to the house is preferable, although if the garage is detached, a side door opposite the door of the vehicle may provide suitable access/egress. If a garage is not provided, a car port is the next best alternative;

iii) There should be space for a wheelchair to manoeuvre in all principal rooms, with bathrooms and toilets large enough to permit lateral transfer from wheelchair to WC and bath;

The detailed dimensions of doorways (wider for wheelchair housing), rooms and garages, and of the positioning of switches, sockets and handles should be as set out in ‘Accessible Ealing’, supplementary planning guidance.
### 5.5 Residential Design

**Related and Subsidiary SPG's & SPD's:** SPG 4, SPG 12, SPG 13, SPG 14, SPD 4

<table>
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<tr>
<th>Council Comment</th>
<th>Save -</th>
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**Wording of UDP Policy:**
Residential development should provide good living conditions for residents and good architectural quality; it should relate well to its setting, and incorporate sustainability principles. In particular, residential development proposals should:

**Good Living Conditions for Residents**
1. Provide an attractive outlook and a sense of privacy for new residents and their neighbours;
2. Provide adequate indoor living space, and garden space well related to the accommodation;
3. Ensure adequate sunlight and daylight;
4. Provide adequate play space for children;

**Good Architectural Quality**
5. Ensure high quality design and materials in development (i.e. buildings, townscape and green spaces) to create places where people would choose to live;

**Good relationship to its setting**
6. Respect the best of the character of the area;
7. Contribute to environmental improvement so that poorer residential communities are brought up to the standard of the best;
8. Demonstrate particular sensitivity on backland sites, ensuring proper access and servicing, and to accord with all aspects of this policy;

**Sustainability Principles**
9. Incorporate green principles in the design, in accordance with the policies of the plan;
10. Where appropriate, contribute to educational and other community provision, and/or access to employment for local residents.

**Comments:**
Agree these provisions, and those in the tables below should be saved, but has anyone checked them provision by provision to LP?

They will also need to be cross-checked to:
- the eventual London Housing SPG and
- the successor to the Mayor’s Interim Housing Guide.
**TABLE 5C  Outlook and Privacy**

1. Residential schemes should allow a distance of at least 21m (70ft) between the windows of habitable rooms which directly face those of another habitable room, or windows of any other premises where these give light and outlook to rooms normally occupied during the greater part of the day or night.

2. New windows within 21m of another facing window including halls, stairways and non-habitable rooms shall be non-opening and of obscure glazing or with a lower sill not below 2m above floor level.

3. Roof terraces and balconies will not be permitted where they overlook neighbouring habitable rooms or garden space.

**TABLE 5D  Residential Garden Space**

- No less than 50 sq metres for a house with under 5 habitable rooms.
- At least 75 sq m for a larger house or group of up to 5 flats.
- The space should be in a form that is adequate to accommodate children's play without loss of amenity to other residents.
- Landscaping should provide space for roots and branches of trees to mature without damage to buildings.
- In areas with a public open space deficiency, more than the minimum standard of garden/amenity space should be provided where possible.

**TABLE 5E  Improving Residential Neighbourhoods:**

A Partnership Approach

1. Comprehensive estate regeneration, where there are problems of poor design and environment, high incidence of crime, social exclusion and a lack of employment opportunities; any proposals for these areas will be derived in partnership with the community;

2. Special attention to environmental health matters in order to identify and alleviate overcrowding and the existence of unfit dwellings, in particular where they are adjacent to the estates referred to in (1) above;

3. Encouraging Registered Social Landlords in the acquisition of older housing for
renovation or redevelopment, with a view to future allocation for rent or resale;

4. Considering further other positive measures to promote the general improvement of existing housing stock, including energy and water efficiency, waste management etc;

5. Development of services designed to combat the disadvantage and discrimination experienced by certain households (e.g. elderly people, people with disabilities, ethnic minority households, and households headed by women);

6. In any of the improvement projects, steps will be taken to promote employment and training opportunities for local people.

TABLE 5F  Infill Development on Backland Sites

Development should ensure that:

i) There is no unacceptable overlooking of houses and back gardens;

ii) Access and car parking areas do not create significant noise and disturbance for existing residents in adjoining areas, or for those occupying the proposed development;

iii) Trees with a high amenity value or parts of the site with wildlife value in the context of the locality, are normally retained and good landscaping provided;

iv) The design reflects the character of the area, the scale is appropriate to the size of the site and any problems of overlooking and frontage development reflects the character of the street scene; or the site is large enough to provide an alternative design in landscape setting;

v) There is adequate space between the existing and new buildings to preserve the visual amenities of the adjoining residents, so that the proposal does not appear overbearing or cause material loss of daylight or sunlight to existing buildings, and those parts of the gardens immediately adjacent to the buildings so as to safeguard the environmental quality of the private garden space;

vi) Within Conservation Areas, any published guidelines are to be followed;

vii) Opportunities for and the desirability of a comprehensive redevelopment with adjoining land have been taken into account;

viii) The proposal will not form undesirable piecemeal development;

ix) The proposal does not create unsatisfactory ‘tandem’ development;
x) On sites under 1 hectare, density will be based on a net site area excluding any access roads and will normally not exceed 150hrh with height limited to two storey houses to reduce overlooking from living rooms;

xi) Where a site of 1 hectare or over is surrounded by housing or other development, housing layouts at higher densities with a mix of dwelling types may be acceptable if the above criteria i-xi) are satisfied and the design/layout provides for a zone, immediately adjacent to the existing property, of 10m width of garden or private amenity space, rather than car parking or road area.

### 5.6 Small Dwellings and Flats

<table>
<thead>
<tr>
<th>Wording of UDP Policy:</th>
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</table>
| The Council supports the development of small units, where this is consistent with local housing needs, and the following considerations:
| (i) shopping centres are particularly suitable as locations for small non-family units of accommodation;
| (ii) the development of extendable homes for new households is encouraged;
| (iii) residential conversion schemes are generally encouraged, except that the sub-division of houses originally built with 5 or fewer habitable rooms or with a floor area of less than 120 sqm will not normally be permitted;
| (iv) the creation of bed-sit units is acceptable, provided that they form part of a conversion scheme providing a satisfactory mix and range of dwellings overall. |

<table>
<thead>
<tr>
<th>Comments:</th>
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<tbody>
<tr>
<td>The details of the UDP policy are not covered by LP 3.5</td>
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<tr>
<td>Of particular importance are the retention of UDP policies 5.6.iii and 5.6.iv.</td>
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<tr>
<td>Conversions to terraced houses to HMO’s are an emerging problem.</td>
</tr>
<tr>
<td>The threshold of 120 sqm should be increased to 140 sqm in order to extend this protection to the slightly larger terraced houses that were built with a kitchens adjoining rear ‘extension’.</td>
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### 5.7 Special Housing

**Related and Subsidiary SPG’s & SPD’s:** SPG 15, SPG 16  

<table>
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<tr>
<th>Council Comment:</th>
<th>Part superseded by LP 3.8.</th>
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| Wording of UDP Policy: |  
|------------------------|-----------------|
| 1. The Council will support the development of special housing provided that: |  
| (i) It satisfies a local need; |  
| (ii) It provides suitable living conditions for residents, including staff; |  
| (iii) It does not result in an over-concentration of such housing in a residential neighbourhood; |  
| (iv) It relates well to the local area in terms of its scale and character. |  

| 2. Approval for proposals to convert single family dwellings into hostel type accommodation to cater for a particular category of housing need, will normally be conditional on the premises being used exclusively to provide for that specific housing need. Where the proposal is for a change of use rather than involving major structural change, and is to deal with a short term planning problem, permission will be for a period of three years. Renewal will be permitted where the council is satisfied that the premises is still required to meet the specific housing need. |  

| Comments: | Not adequately covered by either LP or ED(C)S.  
<table>
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<tbody>
<tr>
<td>UDP policy needs to be retained.</td>
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<tr>
<td>SPG 16 Hostels needs to be retained as the need for its provisions exist and there aren’t any replacement policies at present.</td>
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<tr>
<td>Other Councils are introducing provisions in their Core Strategies to restrain the growth of HMO’s</td>
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### 5.8 Accommodation for Travellers

**Related and Subsidiary SPG’s & SPD’s:**  

<table>
<thead>
<tr>
<th>Council Comment:</th>
<th>Superseded by policy 3.8 and national policy</th>
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| Wording of UDP Policy: |  
|------------------------|-----------------|
| 1. The Council recognises the needs of travellers and provides a caravan site at Bashley Road, Park Royal. |  

| 2. Any planning application for a replacement or additional site for travellers should demonstrate that there is a need for the accommodation, and should have: |  
| (i) Enough space for mixed residential, business and storage use; |  
| (ii) facilities relating to any of three different functions, i.e. as places of settled |  

| Comments: |  
|-----------|-----------------|
|  

occupation, temporary stops and transit sites;
(iii) access to local schools and other community facilities;
(iv) suitable site access, parking, turning and servicing (including drainage);
(v) suitable provision for waste storage, recycling and regular collection;
(vi) appropriate landscaping, planting and amenity space.

### 5.9 Extensions and Alterations to Private Houses and Gardens

**Related and Subsidiary SPG’s & SPD’s:** SPD 4, SPD 9  
**Council Comment:** Save. Note also supplemented by policy 7.6

**Wording of UDP Policy:**  
The Council will consider proposals to extend or alter houses and gardens, including new vehicle access to the property, taking into account:

i. the effect of the proposal on the living conditions of neighbouring residents;
ii. the architectural quality of the proposal and its relationship with the design of the existing property;
iii. the streetscape, and the character of the area;
iv. highway safety issues.

**Comments:**  
Agree, UDP policy, the tables below and supporting SPD’s should be saved.

### TABLE 5G Residential Extensions/Alterations which need Planning Permission

| i) single storey extensions should generally not exceed 3m in depth or height, though this figure will not apply if the development is a sufficient distance from adjoining residential buildings; |
| ii) there should be no day-lighting infringements to the windows of adjoining residents’ property (extensions of 3m should not normally cause day-lighting problems); |
| iii) there should be no loss of space required in relation to the minimum parking standards; |
| iv) there should be no loss of garden space below the amount required in accordance with |
the Council's garden space standards;
v) two-storey extensions to the rear of dwelling-houses will be allowed where the Local Planning Authority is satisfied that there would be no loss of light to any habitable room of adjoining properties, or any overlooking in excess of that currently experienced from the existing rooms of the house to be extended;
vii) an additional storey to existing residential buildings will not normally be permitted where it would cause a significant loss of amenity or destroy the character of the streetscape;
vii) dormer windows should not normally be located on the front elevations of the dwelling; they should be set clearly within the roof profile of the existing roof structure and not take up the whole width or height of the roof;
ix) to avoid an inappropriate terracing effect, side extensions should normally be set back one metre from the adjoining boundary and at least one metre from front of the building at first floor level and above;
x) the scale, bulk and massing of any extension should be subordinate to the existing house, and this may require the roof ridge line of the extension to be at least 0.5m lower than that of the existing building;
x) The roof profile of an extension must respect the character of the existing house, so that a flat roof will not normally be allowed on a two storey side extension.

<table>
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<tr>
<th>TABLE 5H Front Gardens and Vehicle Access to Dwellings</th>
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<tr>
<td>Where planning permission is required for vehicular access to residential property, the Council will seek to:</td>
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<td>• retain front walls or hedges and existing trees with adequate visibility for vehicle movement;</td>
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<tr>
<td>• ensure that the area of hard standing is minimised by using porous surfaces and leaving adequate space for water to drain to existing trees, shrubs and hedges.</td>
</tr>
<tr>
<td>Permission will be normally be refused where the access would be:</td>
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<tr>
<td>i) likely to cause danger to highway users including children and people with disabilities</td>
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</table>
on the pavement;
   ii) to a garden too small to accommodate a car space 4.8m in length between the house and gateway;
   iii) too wide, thus causing a danger to pedestrians as well as having an adverse affect on the appearance of the street. The cumulative effect of adjoining wide crossovers will also be taken into account. The usual width of an access is 2.4m; and
   iv) on a line which would require the loss of a street tree or would cause damage to its root system.

Conversely, hard surfaces over front gardens and the loss of front walls can create a very unattractive space on each side of the road. Where even a low hedge or wall is retained, the sense of enclosure gives some additional security to the front of the house.

*It is suggested that whether or not planning permission is needed, the character of an area depends on the actions of individual householders and the builder or landscape architect. It is important to use the right materials and to put in appropriate planting. This can make a significant environmental impact on the street scene. The Local Agenda 21 Biodiversity Group leaflet on ‘Keeping Your Front Garden Alive’ provides useful guidance to residents.*
CHAPTER 8 - COMMUNITY FACILITIES

To encourage the provision of community facilities to meet the wide-ranging needs of people living, working, studying in and visiting the borough, and to ensure that these facilities are located where they reduce the need to travel and enhance town centres.

8.1 Existing Community Facilities
8.2 Major Developments and Community Facilities
8.3 Redundant Community Facilities
8.4 Large Scale Community Facility Development
8.5 Meeting Places and Places of Worship
8.6 Facilities for Young Children
8.7 Educational Facilities
8.8 Health Care Facilities

Table 8A  Local Principles for all Community Facility Proposals

All community facility proposals shall have regard to the following:

i) The site can be used satisfactorily for the required community facility and its use is compatible with the character and nature of the neighbouring area. This relates to both residential and employment areas (e.g. traffic generation, noise etc);

ii) The site is accessible to the prospective users of the required community facility, by walking, cycling and public transport;

iii) The presumption in favour of community facilities is greatest in the borough’s shopping centres, which are some of the most accessible locations in the borough.
8.7 Education Facilities

Related and Subsidiary SPG’s & SPD’s:

Council Comment: Superseded by policy 3.18 ‘Education Facilities’. See also IDP

Wording of UDP Policy:
The Council will:

i) encourage additional or existing joint use of land or buildings, used by other community groups / activities. Such uses shall not compromise the educational interests of the pupils;

ii) encourage all school development in the borough to improve external areas within the school grounds and that proposals should be consistent with the requirements of the Department for Education;

iii) seek to protect existing school playing fields and that new proposals shall not lead to any net loss of useable areas;

iv) work with educational institutions to provide facilities through good design, to enhance functionality as well as to improve the aesthetic value of the surrounding environment.

Comments:
There are likely to be further changes in the arrangements for the provision of Education over the lifetime of the Core Strategy.

These changes are likely to weaken the Council’s historic role of provider and allocate an increased role to independent providers.

In these circumstances the influence that the Council holds as ‘client’ is likely to be further diluted.

It is therefore essential that the local planning possesses comprehensive powers in order to ensure that the interests of residents are fully represented and considered. See Table 8E vii below.

It is appreciated that LP 3.18.D introduces an umbrella requirement but Ealing’s policies should include provisions that protect surrounding residents from overlooking and other loss of amenity that would not be permitted in the case of an infill housing development.

<table>
<thead>
<tr>
<th>Table 8E  Criteria for Education Facilities (to be read in conjunction with DFE requirements)</th>
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<tr>
<td>Proposals to locate or expand schools and colleges which are not required to comply with DFE site and space standards, will only be permitted if the Council is satisfied that the site and buildings have the capacity to accommodate the number of pupils, staff and students proposed, taking the following criteria into consideration:</td>
</tr>
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</table>

i) Good, safe pedestrian access (on foot and by bicycle) to and from and within the site;
ii) Accessibility of public transport;
iii) Availability of provision of safe setting down or picking up points for coaches or private cars, where the education establishment is likely to have a wide catchment area;
iv) Provision of secure cycle parking and locker facilities;
v) Implementation of a school travel plan;
vi) There is adequate on-site provision of playground facilities related to DFE standards and some landscaped sitting out space for students;
vi) Proposals do not reduce the amenity of adjoining residential properties or conflict with Conservation Areas or Listed Building, Green Belt or Metropolitan Open Land policies, or tree preservation orders;

| viii) Provision of playing fields and adequate classroom and other floor space related to DFE standards. |

| The retention of this provision is essential if the problems with some recent school expansions are not to be repeated in the future with new schools and further expansions |