

## **Vehicle Crossovers and Off-Street Parking for Residential Properties: Council Consultation**

### **Comments from the West Chiswick and Gunnersbury Society**

#### **Principal points**

In devising a policy for vehicle crossovers and off-street parking for residential properties careful account needs to be taken of the different urban types\* to be found within the residential streets of the borough. A policy that is satisfactory for streets of the loose grid type (mainly detached and semi-detached properties with large front and back gardens) that is very common within the borough will not necessarily be appropriate for streets of the compact grid type (predominantly terraces and pairs with well define front boundaries to small front gardens) that is most commonly found in the east of the borough (Chiswick, Brentford and Isleworth) but also occurs, for example, in the Inwood road are of Hounslow.

\*See the Council's Summary of Urban Types within the Urban Context and Character Study published under [http://www.hounslow.gov.uk/index/environment\\_and\\_planning/conservation/context\\_and\\_character\\_study.htm](http://www.hounslow.gov.uk/index/environment_and_planning/conservation/context_and_character_study.htm)

We request that the proposed policy is amended to require:

- No new vehicle crossovers to be permitted within established CPZs
- Planning approval to be required for all vehicle crossovers within Conservation Areas
- Greater weight to be given to consideration of impact of vehicle crossovers and off-street parking on loss of amenity - street scene and environmental quality
- Applications for vehicle crossovers to be submitted to the Council not to Hounslow Highways

#### **CPZs**

CPZs were established on the basis that no future crossovers would be allowed. When the CPZs were introduced in our area residents who did not already have a crossover were offered the one-off chance to apply for one. There was agreement between the Council and residents that, following the establishment of a CPZ, no more crossovers would be allowed. The CPZs, with their potentially reduced parking spaces, were accepted on this basis. Buyers of properties within CPZs should be aware that no new crossovers will be allowed.

The properties in many of our streets comprise Victorian terraces and such a dense urban grid provides a very limited amount of kerbside per property. In addition, a significant proportion of the properties are divided into flats. There is thus heavy pressure on the CPZs in our area both within and outside CPZ hours.

The loss of a single communal on-road parking space in order to create a cross-over for a single private off-road space is an extremely inefficient and “selfish” use of this limited kerbside and would lead to a net loss of communal parking. Communal on-road parking spaces represent the most efficient use of limited kerbside since they are equitably available to all legitimate users (residents and their visitors, parking meter users (where appropriate) and others outside CPZ hours), whenever vacant. A private off-road space, however, is not available to any of the above; whenever vacant, it is therefore a lost, wasted space.

We therefore request:

- No new vehicle crossovers to be permitted within established CPZs

*This will require the following key amendments:*

1.1 Ament to read “In many cases, other than in established Controlled Parking Zones (CPZs), a homeowner...”.

1.7 Delete last bullet.

Section 6 Delete this entire section.

*Other minor/editorial amendments may also be necessary.*

## **Conservation Areas**

Permitting crossovers and the associated hard standings for vehicles in order to provide off street parking in front gardens degrades the character and appearance of our Conservation Areas since it facilitates the loss of front boundary treatments and planted front gardens which are often positive and characteristic features of our Conservation Areas. The compact grid nature of many of our streets with their small front gardens and short property street boundaries makes such loss particularly significant. The loss of front gardens and garden walls to hard standing is given as one of the threats to compact grid within the Council’s Summary of Urban Types.

All applications for crossovers in Conservation Areas must require planning permission so that they can be fully assessed by planning officers against the Council’s planning policies including those for Context and Character (Local Plan, Chapter 6), Biodiversity (Chapter 7) and Environmental Quality (Chapter 9) and in light of comments received from interested parties following consultation.

We therefore request:

- Planning approval to be required for all vehicle crossovers within Conservation Areas.

*This will require the following key amendments:*

2.1 Add as 3<sup>rd</sup> bullet “If the application is for a property in a Conservation Area” and delete “or is subject to... (... areas).” from the current 3<sup>rd</sup> bullet.

*Other minor/editorial amendments may also be necessary.*

## **Street Scene and Environmental Quality**

Any consideration of an application for a crossover should take full account of the potential negative impact on the street scene (see above under Conservation Areas) and on environmental quality. Crossovers in streets with small front gardens lead to the loss of the important elements of the street scene referred to in para 4.1.

Permitting crossovers and the associated hard standings for vehicles reduces the opportunity for biodiversity and alleviation of air pollution by removing soft landscaping and trees from front gardens in order to create off street parking. It may also result in increased surface water runoff from impermeable hard standings, if the use of suitable materials is inadequately enforced.

No street tree should be removed to facilitate a crossover. Buyers of properties within tree-lined streets should be aware that street trees are an important feature of the street and that they will not be removed to facilitate a crossover.

As written the proposed policy is not sufficiently robust with respect to amenity. See, for example, 3.27 where the wording is only advisory “generally 50%” “should have” “should drain”. In addition factors that are important in order to maintain an attractive street scene need to be considered in any crossover application rather than only when a planning application is required.

The benefit to an individual property owner of providing a vehicle crossover to allow off street parking in a front garden should be considered in light of all amenity issues and a proper balance achieved.

We therefore request:

- Greater weight to be given to consideration of impact of vehicle crossovers and off-street parking on loss of amenity - street scene and environmental quality

*This will require the following key amendments:*

5.3 Amend to read “If there is no alternative location, the applicant may request that a trial hole is excavated to determine the extent of the tree roots within the precautionary area. The Hounslow Highways Arboriculturist will be asked to provide a report on the safety with respect to the tree of providing a crossover. All costs will need to be met by the resident in full, even though it may not prove to be feasible to install a crossover. Unless the arboriculturist is satisfied that neither construction nor use of the crossover will compromise the health of the tree, the crossover application will be refused”.

5.4, 5.5 and 5.6 Delete.

Wording of relevant paragraphs needs review to strengthen it from advisory to requirement (see examples quoted above).

*Other minor/editorial amendments may also be necessary.*

## **Application submissions**

As indicated in para 1.7 it is the Council that is responsible for assessing the application. All applications for vehicle crossovers should, in the first instance, be submitted to the Council as the latter should be responsible for deciding whether or not planning permission is also required or for invalidating/refusing an application for a property within a CPZ or one divided into flats.

For valid applications the Council can then request a highway safety assessment from Hounslow Highways and, in relevant cases, inform the applicant whether planning permission will also be required.

If Hounslow Highways personnel are to be responsible for assessing applications (para 1.8) with respect to issues other than road safety, on what basis will they make such assessments? Do area engineers receive guidance and training in relation to issues such as the appearance of the street scene?

In cases where planning permission is required, it is quite unacceptable for Hounslow Highways personnel to prejudge whether planning permission will be granted in the way implied by paragraphs 2.3 and 2.4. Assessment of issues such as the impact on the character of a Conservation Area are not within the competence of such individuals. To allow Hounslow Highways to communicate such a presumption to the applicant would seriously undermine the assessment by planning officers against the full suite of planning policies and supplementary guidance.

We therefore request:

- Applications for vehicle crossovers to be submitted to the Council not to Hounslow Highways.

*This will require the following key amendments:*

1.2 Amend last sentence to read “Application forms may be downloaded ...Highways website and, when completed, should be sent to the Council” (need to specify which department).

1.8 Amend to read “The Council informs the applicant whether or not the application is valid and whether or not planning permission is also required. The application, if valid, is passed to the Hounslow Highways Area Engineer who will assess the application against the policy criteria and discuss requirements with the applicant.”

2.2 Amend to read “The initial application should be made to the Council as under 1.8” (need to specify which department).

2.3 Amend to read “If the request meets the minimum road safety criteria, the applicant will automatically be sent information by Hounslow Highways on how to apply for planning permission. The applicant will be informed that a crossover will not be constructed unless planning permission is granted.”

2.4 Amend to read “Applicants are required to submit ...so that the Planning Officer knows what the advice is”.

2.7 This paragraph requires clarification as to whether advice should be sought from the Planning Department before applying for planning permission or before making an initial crossover application.

*Other consequential and/or minor/editorial amendments may also be necessary.*

### **Other points**

3.9 Now that residential streets are to have 20 mph limits, it would be more useful to use this speed rather than 30 mph as the example for visibility distance.

WCGS July 2016