



Acton Green Residents' Association
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Planning

London Borough of Hounslow
Civic Centre
Lampton Road
Hounslow
TW3 4DN

1st December 2014

E-mail: planning@hounslow.gov.uk

Attn: Sean Doran, Case Officer

Dear Sirs,

408-430, Chiswick High Road, Chiswick, London W4 5TF

Hounslow System reference P/2014/3288 and Planning reference 00248/408-430/PI

Acton Green Residents' Association ('AGRA') **OBJECTS** to this proposed development on the following grounds.

1. Summary

AGRA believes that the proposals for this development are not in accordance with the principles for sustainable development in national, regional and local planning policy. If realised, the development would have a detrimental impact on the surrounding area, including the Acton Green area of Chiswick.

The proposed plans show little feeling for healthy, balanced, sustainable development of the local area. They add nothing to local amenity.

The proposals take no account of the social infrastructure and amenity required to support existing residential properties in the area around the development site, further residential development underway and planned in the area, and neighbouring development opportunities. To the contrary, a development such as that proposed by the plans submitted would be a serious block to sustainable development of the development site, the neighbouring sites and the surrounding area.

The main grounds for objection are set out below. It is believed that this application should be rejected in its entirety so that new applications can be considered with the benefit of proper consultation and consideration to include neighbouring sites and taking into account the opportunities for sustainable development in this important successful area of Chiswick.

2. Lack of consultation

There has been **insufficient proper informative consultation**. Where there is a development on the border of two London Boroughs, especially one that will have a direct impact on the neighbouring borough, there should be full consultation in the whole of the area affected.

The developers claim that there has been good consultation in the whole of the area affected. That is, sadly, not borne out by the evidence.

The applicants, Lend Lease, acquired the site in February 2014. The Land Registry records a price of £ 24 million. There is no evidence of any discussion or consultation about development of the density and scale now proposed prior to acquisition of the site. There was certainly no community consultation and there is no evidence of any pre-planning consultation with Hounslow Council (or the neighbouring Ealing Council), or of any consultation with other stakeholders in this locality, most importantly Sainsbury's (and co-owners British Land) who have a dominant presence in this restricted location between Chiswick High Road to the south and the railway lines that mark the boundary of Hounslow and Ealing to the north. The area within which the site purchased by Lend Lease lies is an important one that provides a real opportunity for beneficial sustainable development.

After purchase of the site in February 2014, there has also been a sad lack of meaningful consultation, both before and after this planning application was made. The proposed development undoubtedly has the potential to have a serious impact on a wide area around the site as well as the site itself and its immediate surroundings.

In the AGRA area (the residential area to the north of the development site) and in Southfield, the Ealing Council Ward of which Acton Green is part, residents did not receive the developer's publicity or invitations to their brief exhibitions. Furthermore, the presentations given at the exhibitions and on the developer's website obscured important aspects of the development.

Most importantly, the bulk and extent of the additional 8 storey tower block proposed to be built on the car parks on the northern part of the site was hidden. This proposed tower block is far higher than any neighbouring building. The height exceeds any neighbouring building apart from Empire House itself that has for many years been regarded locally and by Hounslow Council in its planning policy documents as an aberration in terms of height and bulk. Hounslow's planning policy has been clear that it is not to be used as a precedent for neighbouring development.

Perspective views from locations that took advantage of Empire House itself, other buildings with their proposed additional storeys, and trees to obscure the size of the proposed new tower block on Essex Place were used to draw attention away from the new tower 8 storey tower block. Views from the north were likewise from behind trees and bushes that obscured the extent of the building on Essex Place and also hid the new building proposed for Acton Lane, a five storey tower block proposed for a prominent location on a road that currently has building to a maximum of four storeys, on a small car park site where permission was previously granted for a four storey building.

3. The proposed new seven and eight storey residential tower block on Essex Place.

The land on which it is proposed to build this building is currently a car park on the north side of Essex place. There is no previous permission for a building on this site. The site is between Empire House and Sainsbury's Superstore (31 Essex Place) that is jointly owned by

Sainsbury's and British Land. To the north the proposed building will overlook Sainsbury's Superstore, its well-used delivery area and the adjoining Sainsbury's customer car park, a well-used 380 space car park that incorporates an open recycling area. The car park is the only larger car park along this part of Chiswick High Road.

The existing nearest residential area to the east comprises mainly two and three storey residential houses and flats. There is a good range of mixed housing. To the west there are shops and businesses at street level along Acton Lane running to Chiswick High Road, three stories close to the High Road rising to a maximum of four stories. Further to the west there are similar houses and flats, the highest being Dewesbury Court, a traditional Edwardian block of flats (built of red and yellow London stock brick) rising to five and a half storeys above ground.

The proposed Essex Place tower block rising to eight stories is out of character, out of context and completely inappropriate for this location. Squashed between Sainsbury's and Empire House, it would take up space that could be used as amenity space for any residential or other development permitted in Empire House and its wings (the buildings along Chiswick High Road). The area is already a place of amenity deficit. The car parking area is only unused because it has been blocked off by chains and barriers. It is an obvious location to provide further amenity space. If **any** further residential development is permitted in the development site, then it will be essential to use this space for amenity. If it is not so used, then the remainder of Essex Place will be insufficient to provide for proper vehicular access and amenity to existing and new residents and traders.

The proposed block **is far too high**. The developers themselves concede that there is presently nothing greater than 5 to 6 storeys high anywhere north of Chiswick High Road, apart from Empire House itself. Hounslow has regarded this area as unsuitable for high rise development and this has for years been reflected in local planning documents, including the local plan (eg **6.10**), character and context studies, (eg **CC3**) and in planning decisions. This is not an area of Hounslow where any further high rise development has been or should be permitted.

The proposed block will present **a barrier and a block to sustainable development** of the restricted area in which it lies.

The proposed block will have a severe detrimental negative impact on the **skyline**. It will create an asymmetrical intrusion that will damage the skyline and character of the area, taking away a skyline that is at present harmonious apart from the single intrusion of the eleven storey Empire house, including valuable views from the north of the recently refurbished Christ Church spire.

The fact that the new tower block may not be visible when standing close to the buildings on the north side of the High Road, including the neighbouring part of the High Road itself, does not detract from the damage that such a building will do to visual amenity from further away in all directions, and the enormous damage that such a building would do to the character and sustainability of the area.

4. The proposed new five storey building on the corner of Acton Lane and Essex Place.

This is an important and prominent location. It represents the entrance to Hounslow from Ealing. It looks towards the important Grade II listed art deco Chiswick Park tube station to the north, is also close to the Grade II listed Old Pack Horse to the south and the Edwardian brick built Dewesbury court to the west. The neighbouring buildings on Acton lane are three and four stories only and the maximum height of a building on this location should be four storeys, the height of the previously proposed residential development that was granted permission on this site. At the maximum, it should be no higher than the four storey office and apartment block on the opposite side of the Acton Lane.

5. Empire House

The Empire House tower was built in 1961 as office space and is **not suitable for the modern residential market**. The fact that conversion to residential is permissible under legislation allowing change of use as permitted development does not justify allowing development of the scale and nature now proposed. The proposed addition of **large protruding balconies** on Empire House, the conversion of the Chiswick High Road frontage

to a **Manhattan-style entrance and a tower that soars directly from the pavement** and the **addition of two storeys** to accommodate penthouses, would be very obtrusive and unwelcome. Lend lease claim to be adding 'only' an extra 2.4 meters, to the building. However, the effect will be to create a building that appears far taller and will be wider and more obtrusive without providing any corresponding gain.

The proposed conversion is out of character and context. It is unsuitable for this location within the Turnham Green Conservation Area and an intrusive, unwelcome addition to the skyline visible from the Acton Green Conservation area and its neighbourhood. The Empire House site is far more suitable for the creation of facilities for activities that do not require outdoor space, including modern offices, hotel or conference space, or community and institutional space. Lend Lease justify the additional height and width as necessary to give them the financial return they are seeking. However, such financial considerations should play no part in permitting development of the building in a manner that does not accord with planning policies, especially those designed to ensure sustainable development. The building can and should be developed within its existing envelope.

The **height of the buildings planned** to the west of Empire House along the High Road beside the Grade II listed Old Pack Horse pub is not clear. These should be markedly lower in height than the roofline of the Old Pack Horse and should in no way interfere with or obscure existing views of the Old Pack Horse as a distinct building.

6. Social Infrastructure, Amenity and Employment

The site and its neighbourhood already lacks social infrastructure and amenity, apart from retail. There is **insufficient local social infrastructure** to support residential development here. Apart from retaining the existing retail space, the proposed new development is exclusively residential. Health, arts, leisure, education and open space are all under pressure. The area is one of deficit in all these in the surrounding area of both Hounslow and Ealing whilst housing developments in both Hounslow and Ealing are scheduled to meet or exceed targets. This means that attention to the consequences of the proposed development in this particular location for sustainability in the area around it is vital.

The proposed development would take away valuable space that is not currently built upon, without adding anything to the social infrastructure required to support local residential development including 137 new dwellings here. It is high rise residential development in the wrong place: a location currently earmarked by Hounslow as a Preferred Office Location and Hounslow's Council's proposed uses for this town centre **employment** site is hotel, office and retail (new Local Plan document: Site Allocation).

Recently built and planned residential development near the site already put serious strain on the local infrastructure. Areas designated for further residential development do not include this site for good reason. As the application points out, the site benefits from high public transport accessibility (PTAL). However, in this location this should not be squandered on residential development at the expense of social infrastructure, amenity and employment spaces that should benefit from maximum public transport accessibility.

6a. Retail

Although the proposed development does not add to retail space, it aims to improve the existing retail space, **without making provision for the extra vehicular traffic and the demand for parking** that this will generate. The developer justifies the loss of parking space by saying that the Essex Place car parks are no longer used: however, as has already been noted, that is because the entrances have been closed off! Taking away the Acton Lane and Essex Place car parks will leave the already busy Sainsbury's car park as the only significant local car park.

6b. Access to and from open spaces, footpaths and cycle routes

The development is said to rely on Turnham Green, Acton Green Common and Gunnersbury Triangle Nature Reserve for access to ground-level open space. The latter is a nature reserve that should not be treated as a public park. That makes Turnham Green and Acton Green vital. Existing access on foot or cycle between Acton Green Common and its neighbourhood and the area in which the development site is located is poor. Yet there are **no plans for improving the very poor pedestrian access over the railway line** at the Acton Lane bridge and the Bridge Road railway footbridge. Both require improvement for pedestrians and bicycles. Any further development of the site and/or the area around it

should be accompanied by significant improvement of both crossings (and/or a new crossing over the railway) for pedestrians and bicycles.

6c. Essex Place

The **existing roads and parking spaces are not sufficient** for the vehicular traffic that the development would generate on top of existing and predictable needs. Access to Essex Place is awkward and constricted. The location, which has good access to public transport, is far more suitable for socially, environmentally and economically sustainable development, including office, hotel or conference, community or institutional use, and open space, consistent with Hounslow's local plan.

In the planned development Chiswick High Road would provide access by foot only to those buildings that front onto the high road. All vehicular access to the whole site would be via Essex Place. That would also have to cope with rear pedestrian and cycle access to all the buildings and would be the only vehicular, pedestrian and cycle access to the proposed Essex Place tower block. **The proposed development would not improve the remaining public realm. To the contrary it would squander any opportunity to do so and overburden Essex Place.**

7. Housing type and mix

Information about the amount and mix of housing, particularly levels and location of affordable housing, is seriously lacking. Although it is far from clear, it appears that it may be intended that on site affordable housing is to be concentrated in the poorly designed, over-high, Acton Lane block. This would 'ghettoise' both that block and any housing permitted in the remainder of the development and would contravene requirements for affordable housing. It would prevent the promotion of a social mix beneficial to long term sustainability.

Any attempt to use the prospect of a financial contribution in order to obtain permission for increased residential development on site that would otherwise not be permitted should be strongly resisted here as any short term financial gain will be at the expense of the long term sustainable development of this site.

8. Sustainable development in this area

The context of this site is vital to assessment of this planning application. For the reasons set out above, the development proposed by this planning application would not be sustainable. However, particular attention should be paid to the neighbouring properties in the restricted area, between Chiswick High Road and the District and Picadilly Railway Lines, of which the development site is part. It is vital that the neighbouring properties, in particular Sainsbury's Superstore and its car park, are not hemmed in or blocked from sustainable development. These sites are already important to the local economy, a vital part of local social infrastructure and amenity. The ground level car park and low level superstore cover a large land area that should not be blocked or blighted by inappropriate neighbouring development such as that proposed by the application.

It is submitted that the proposals in this application would remove opportunities for responsible, attractive sustainable development in accordance with local, regional and national policies to the long term benefit of this part of Hounslow. Acton Green Residents' Association would welcome attractive sustainable development of the site and neighbouring sites. It urges that this application is rejected to provide the opportunity for responsible sustainable development of this valuable site in accordance with local regional and national policy in a manner that will truly benefit the local area and provide a real contribution to successful, sustainable development and growth.

We ask that this application is **REFUSED**.

Yours faithfully,

Acton Green Residents' Association

Christopher Chauncy, Secretary

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