# Chiswick High Road Action Group (CHRAG)

# **OBJECTION**

# 408-430, Chiswick High Road

Empire House and Essex Place High Rise Development

**Planning Authority:** Hounslow

**System ref**: *P/2014/3288* 

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## 1.0 Chiswick High Road Action Group

CHRAG is an amorphous group comprising local residents and business people. It is committed to supporting good sustainable development of the Chiswick High Road Area.

CHRAG is determined that the opportunities afforded by this site should be exploited to benefit sustainable growth for the future of those who live and work in, and those who visit, Chiswick.

## 2.0 Executive Summary and Overview

CHRAG **objects** to the proposed development.

Key points are summarised in Section 3.0 and further more detailed comments may be found in Sections 4.0 to 7.0.

Lend Lease seeks to take advantage of current high residential property values by maximising the number of residential units on the site.

This approach ignores the existing deficit of local amenity and infrastructure apart from retail.

It makes no contribution to the future sustainable development of Chiswick.

It ignores the opportunities for development on this key site consistent with the *Character and Context Study for Chiswick* and local, regional, and national planning policy.

### 2.1 Attempt to justify inappropriate development based on a pre-existing tower block

Lend Lease have planning permission for the conversion of Empire House to residential under permitted development, something over which the local planning authority had no control. This permission applied to the floor plate of Empire House itself. Lend Lease now proposes to extend this block both upwards and outwards, and in addition seeks permission for new residential developments on other areas of the site.

This includes a 7 and 8 storey block on a car park that has not been subject to a previous planning application, and a 5 storey block on a car park that does have existing permission for residential development.

The proposed development is wholly out of keeping with this part of Chiswick. The proposal provides residential units at the expense of local amenity and is ultimately a block to sustainable development of this part of Chiswick.

#### 2.2 A wholly inadequate and misleading consultation process

The lack of proper informative consultation is matter of grave concern. 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. Many residents did not receive the developer's publicity or invitations to their brief exhibitions. The "consultation" consisted of a set of presentations and a set of survey questions biased towards the small number of uncontroversial features of the application.

Controversial aspects of the proposed development have been downplayed and hidden.

# 2.3 Refusal to provide any information on affordable housing and contribution to infrastructure and local amenity

Despite clear requests Lend Lease has refused to provide any information on this key aspect of the development. CHRAG believes this reflects an approach focused on maximising profit at the expense of any other considerations.

# 3.0 Key Points

#### 3.1 The existing tower

CHRAG objects to the increase of the external dimensions of the existing tower to accommodate an increase in its total floor area, notably the addition of external balconies and two additional storeys of accommodation.

Empire House tower was built in 1961 as offices. Government legislation now makes it possible to convert offices to residential space under *permitted development*. That does **not** mean that any sort of conversion should be allowed. In this case, the addition of large protruding balconies, the conversion of the frontage to a Manhattan style entrance, the tower soaring directly from the pavement, the addition of two storeys, and the failure to add to amenity space, either for the new residents or for anyone else, is unacceptable.

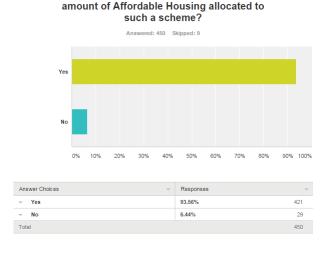
#### 3.2 Infrastructure and amenity

Local infrastructure and amenity are already under strain. There is an existing need to provide social infrastructure. The proposed development will add to that need.

The development proposals remove the opportunity to integrate this social infrastructure in the future by covering the whole site with residential units.

#### 3.3 Affordable housing

Lend Lease has refused to provide any information regarding affordable housing.



Do you think an investment firm should be up-front with local residents about the

> CHRAG's survey results showing vast majority of residents believe Lend Lease should be up-front with them about Affordable Housing

It is noted that recently a tribunal forced Lend Lease to disclose information that they sought to withhold in connection with their Heygate development at Elephant and Castle.

This approach is unacceptable. Lend Lease must make clear the mix of affordable housing planned for this development. Local residents, workers and others should be allowed to have a say on this scheme with access to this information during a legitimate consultation process.

The quantity and location of affordable housing should be clearly specified in any major full application put forward for planning approval. So should the financial contribution that the scheme will yield to the infrastructure and amenity necessary to support the proposed residential development.

Affordable housing should be encompassed within the proposed development in a way that prevents it becoming an isolated social enclave. To do otherwise would present a burden or even a bar to sustainable development of this important location. Social mix and adequate infrastructure and amenity are vital to building upon the success of this part of Chiswick, and in creating a sustainable future for Chiswick High Road and its neighbouring areas.

#### 3.3 The consultation process

The "consultation" was inadequate.

The presentations given at the exhibitions and on the developer's website obscured important aspects of the development. The increased height and width of Empire House and the bulk and extent of the additional tower blocks was hidden. Pictures were used that obscured the nature and mass of the development.



LEFT: Lend Lease image of Empire House Tower from behind the bushes

Although Lend Lease claim to have sent several thousand leaflets, their "exhibitions" were poorly attended.

A rudimentary online survey conducted by CHRAG shows results that are diametrically opposed to Lend Lease's assertions of public opinion.

Survey results are shown in Appendix 1.

#### 3.4 The residential development of Essex Place Point 1

CHRAG objects to any substantial residential development on this space. This is unnecessary and inappropriate for the location.

This part of the site is required;

- as amenity space for residents of Empire House tower block and adjoining wings
- 2) to accommodate the plant room proposed by Lend Lease
- 3) to create a pleasant environment for visitors

Further acceptable uses might include small business units, and buildings that could be used for educational, leisure, and healthcare. This might substantially and sustainably improve the Essex Place street scene and allow safe use by pedestrians and cyclists.

Change of use of all of this space to residential is unacceptable and the proposal fails to take advantage of the opportunities to add to local amenity.

#### 3.5 The residential development of Essex Place Point 2



ABOVE: Lend Lease image. Chiswick of the future?

If any new building is permitted on Essex Place the development must be compatible with the *Chiswick Character and Context Study* and *Local Plan 2015* - 2030.

The development must respect the low-rise nature of Chiswick Town Centre outlined in these documents. The scheme should be comparable to other developments situated off the High Road at urban or suburban densities, restricted to a maximum of 4 storeys and with appropriate amenity space especially garden space if town houses are to be built.

#### 3.6 The corner development

The proposed building, which is on a busy public highway close to the railway crossing between Hounslow and Ealing, lacks architectural merit and CHRAG objects to the design.

This prominent and key location provides an opportunity for a visually appealing gateway into both Hounslow and the Chiswick High Road Area.

The location of this site is half-way between two buildings of great architectural significance of their eras; namely Chiswick Park Tube Station and The Old Packhorse.

As such it should be reconsidered as an opportunity for exemplary 21st Century design.

The building should be reduced in height in keeping with surrounding buildings and any building that does not conform to Hounslow's highest standards for planning should be rejected.



ABOVE: Lend Lease state this Grade II Listed Art Deco building is reflected by their flat-pack Acton Lane block

The angular, balcony strewn slab in no way meets Lend Lease's stated objective of "reflecting the Chiswick Park Station curved brick structure" or of "taking cues from Chiswick Park Station".



LEFT: The red and yellow London stock brick of older neighbouring Dewsbury Court

The pale, red brickwork is bland, flat and uninteresting and does not reflect the red and yellow London stock brick of the older, neighbouring properties; it is and looks cheap. The balconies use industrial-style, flat and featureless aluminium panels and cladding.

A large ground floor door looks like the entrance to a factory or warehouse and has no place as part of a residential building.

This is the only part of the project where Lend Lease has suggested affordable housing. Affordability is however no reason to propose a building of such poor design and build quality.

#### 3.7 External materials and aesthetic design

This is covered in more detail in Section 5 below.

In summary the poor architectural quality of existing buildings is no excuse to replace them with another development of poor architectural quality.

# 4.0 Lend Lease stated objectives – vs. – Lend Lease Proposals

#### 4.1 Summary

The application, in particular the planning statement, makes a large number of generalised comments about the nature of the development. Many of these are either unsupported by or, in some cases, directly contradicted by the detailed plans. A selection is provided below.

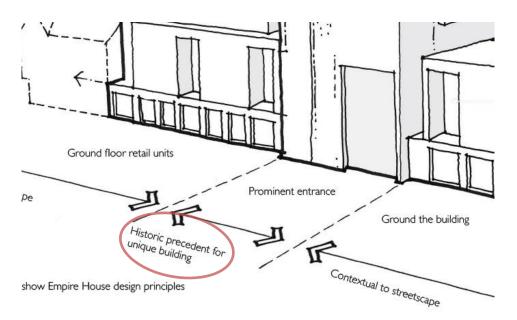
Lend Lease's proposed development does not accord with its own stated principles;

- its plans show little feeling for healthy, balanced sustainable development of the local area. They add nothing to local amenity.
- the focus is on high price, high rise residential development. It is financially driven by high property prices in this location.

#### 4.2 Historical Context

Lend Lease makes much of the history of the sites. Whilst pointing out that Chiswick High Road is generally comprised of 2-3 storey brick buildings, often with Mansard roof accommodation and bay windows, this is not in any way reflected in the proposals.

The development lies in a conservation area where the existing environment should be "preserved and enhanced". No attempt has been made to take account of this. There is no relationship between the historic Empire Theatre and the re-worked Empire House, other than the retention of the name, although they make much reference to the historic links, and claim the Chiswick Empire as a "historic precedent for unique building".



Further the sites are adjacent to two listed buildings – Packhorse Pub and Chiswick Park tube. The proposed architecture makes no concessions or acknowledgement of them.

#### 4.3 Size of Empire House

Lend Lease claims to "maintain the existing mass of Empire House".

In fact the proposals are to increase the height by 2.4 metres by adding two storeys of penthouses on top of the tower (response by Assael architects at the Chiswick Area Forum, 23 Sept 2014), and the width by 3.2 metres by adding balconies sticking out on both sides.

4.4 Lend Lease claims they will "ground the block and reference the unique character of Empire Theatre".

Empire Theatre was a wide four-storey building with an ornate dome/cupola on top. Empire House is a rectangular block in completely different material. In fact the development has no reference to the Theatre apart from retaining the name, and the entrance which "grounds" the tower is intrusive and would destroy the integrity of the street scene.

#### 4.5 Overall Design Objective

Lend Lease states this to be as;

"Comprehensive redevelopment of the site for residential led mixed use development [...] and improvement to the public realm and creation of on and off street car parking."

In fact the proposals only public realm offer is to create a narrower road with greater traffic load, increase the total car requirement in the area while creating no additional car parking space

#### 4.6 Public Realm

Lend lease states that;

"The utilitarian service road will be transformed into a pleasant and safe space that will prioritise pedestrians with the creation of a shared surface roadway and 10 new private car parking spaces, including 8 secure wheelchair accessible spaces are proposed [sic] at ground floor with two located on the Acton Lane site and eight on the Essex Place site. In addition, limited additional car parking

spaces will be provided where possible on the public highway on Essex Place to complement the existing CPZ parking spaces which will be retained. These additional spaces will be in the form of one additional CPZ space and one Zipcar space with the potential for a second space subject to demand."

In fact their proposals narrow the roadway (which is used by HGVs on a regular basis) whilst increasing vehicle load, retain existing on-street parking and create a canyon between two high rise blocks rendering the road both unattractive and more dangerous to pedestrians and cyclists. The proposals permanently remove from use about 100 existing car parking spaces, replacing them with 12 spaces in total to provide for 136 new residential properties.

## 5.0 Design elements within the *Design and Access Statement*

Part of the site is within the Turnham Green Conservation Area, where the principal requirement for a new development must be to *preserve and enhance this area*. The architectural inadequacy of the existing low-rise Chiswick High Road shop fronts should not be taken as a standard from which to measure enhancement. It is important that the pre-1961 townscape is taken as the basis for reference.

#### 5.1 PPS5 (Planning for the Historic Environment)

PPS5 is clear in stating that LPAs should take into account the desirability of new developments making a positive contribution to character and local distinctiveness of the historic environment. It continues: "the consideration of design should include scale, height, massing, alignment, materials and use" (HE7.5).

Against these criteria, the Empire tower proposals are wrong on scale, height and massing.

"Alignment" is more-or-less determined by the existing tower and "materials" is more about how they are used and detailed.

#### 5.2 The north side of Chiswick High Road

The north side of Chiswick High Road is largely comprised of narrow-frontage retail with two or three windows on each upper floor which forms a tight rhythm of elements and articulation. This is complemented by a varied but inherently similar roofline.

#### 5.3 The proposed frontage on Chiswick High Road

The CHR frontage to the new development is on a much larger scale with spare and apparently rather bleak detailing, which is significantly at variance with the character of the surrounding townscape.

#### 5.4 Proposed materials

Suggested materials are red and buff coloured stock brick and lightweight stone veneer. Brick and stone are inherently excellent cladding materials, but it is a matter of how these are detailed. The D&A statement mentions the wide variety of facing materials visible in the surrounding area, but the predominant materials are brickwork with stucco detailing.

#### 5.5 Bland materials, lack of detailing

The problem with the elevation and perspective drawings forming this application is that there appear to be large, bland areas of materials un-relieved by interesting detailing.

#### 5.6 Relationship with Old Packhorse

The abutment of the new CHR frontage to the Old Packhorse is addressed but the solution is inappropriate. The advertised "recess" is outweighed by the balcony projection and the pavement level alignment. The inconsistency between drawings (cf pages 42 or 45) conceals this. It is important that anything abutting onto the listed pub is appropriately "subservient".

#### 5.7 PPS5 (Heritage Asset)

PPS5 (HE10.1) states that when considering an application for development that affects the setting of a heritage asset (= Listed Building) LPAs should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset.

When considering applications that do not do this, LPAs should weigh any such harm against the wider benefits of the application. The greater the negative impact on the significance of the heritage asset, the greater benefits that will be needed to justify approval.

#### 5.8 Old Packhorse

#### The Old Packhorse listing description is:

Circa 1905. Public House. By Nowell Parr. Red brick with terracotta and coloured tiling decoration and tiled roofs. Three storeys, 5 bays facing timber beam and the return to Acton Lane. Unaltered Public House front in tiled work with Corinthian columns. Mullion and transom windows above. Terracotta segmental pediment in centre. Two roof gables. Additional terracotta decoration in the way of window dressings, balustrades etc. Unaltered exterior and largely unaltered interior. Important corner position. Tile best preserved example of a public house by the Fuller, Smith and Turner house architect.

That description is merely a "legacy record" which may be enlarged upon eventually. However, it emphasises the quality and importance of the external elevations, which must not be encroached upon or overshadowed by the adjoining new buildings.

#### 5.9 Christ Church Turnham Green

The other listed building which is affected by the Empire Tower is Christ Church. This forms the centrepiece of Turnham Green and is Listed Grade 2. It is one of the earlier churches designed by George Gilbert Scott, possibly the greatest Victorian architect.

The Listing description specifically states that one of the three principal reasons for its listing is:

Set back on the south of Chiswick High Road, the church is sited in a large green area, and the building and its setting create an important focal point in this part of Chiswick.

The setting is therefore confirmed as part of its Heritage Asset quality and as an important focal point to this part of Chiswick.

#### 5.10 Empire House Tower



LEFT: Lend Lease sketch of their new enlarged tower. Balconies barely visible, and proposed Essex Place missing from the picture

The existing tower block, Empire House, is described by Hounslow Council in the Turnham Green Conservation Area Planning Statement as being of "obtrusive height".

The 1983 re-cladding enlarged the bulk of this obtrusive tower by a considerable amount.

The current application seeks to raise the height and to project balconies, which will further increase the appearance of bulk, whichever direction it is viewed from. Drawings are not completely clear but it appears that there may be recessed balconies in the south facade, overlooking Turnham Green, and projecting balconies on the west and east elevations.

Whilst it is possible to draw projecting balconies to imply they have minimal visual impact, the reality will be that this already bulked-up mass of tower block, will appear to be even fatter.

Viewed from the south – across Turnham Green – it will be difficult to see the church and its spire without the increased height of the Empire tower behind. Viewed from either side, East or West, along CHR, the mass of the long elevation, taller and no improvement aesthetically from the present mirror glass, will literally tower over the small-scale buildings of the High Road and the Green.

There is no justification in permitting this obtrusive tower to grow bigger again.

The main entrance proposed into the enlarged Empire Tower from CHR, is a three-storey tall "portico" with a recessed glass and sheet aluminium wall surface behind.



LEFT: Historic Chiswick Empire

The D&A's statement that this emulates the grandeur of the original theatre would be laughable if it were not meant seriously.

The original theatre was extrovertly ornate and decorative Frank Matcham Baroque, with a 3-bay central section of the frontage being a two storey "triumphal" arch opening over the ground floor marquee. Any more than a moment's thought will demonstrate there is no comparison between the new Empire tower entrance and the Edwardian theatre.



LEFT: Lend Lease image of proposed Manhattan-style entrance

"Grounding" the tower, as referred to in the D&A Statement, by dropping eleven stories of the cliff-face of the building straight down to pavement level, is no way

to reduce the detrimental effect of its bulk on the skyline or as a backdrop to Turnham Green church or to the Conservation Area.

#### 5.11 Chiswick Park Tube Station

The Acton Lane block faces across the road to Chiswick Park station. The station building is Grade 2 Listed (= Heritage Asset) and one of a group of important inter-war Deco stations by Charles Holden. Other recent mundane developments which have been permitted nearby should be no excuse for yet another. Planning authorities have a duty to protect the area around Listed Buildings from inappropriate developments which damage or detract from that building or its setting.

Irrespective of arguments about whether the development should be permitted at all, the totally unsympathetic architecture of the buildings proposed should be rejected.

## 6.0 Sustainability, Amenity, and Density

The development site with its excellent transport links is suitable for uses consistent with Hounslow's Local Plan including office, hotel / conference, community / institutional and open space.

Such uses would represent socially and environmentally sustainable development, as well as being financially sustainable.

What is proposed is adding purely residential units. This removes the opportunity for other uses of a large part of central Chiswick forever and endangers its sustainability.

#### 6.1 The new high rise residential development on the north side of Essex place

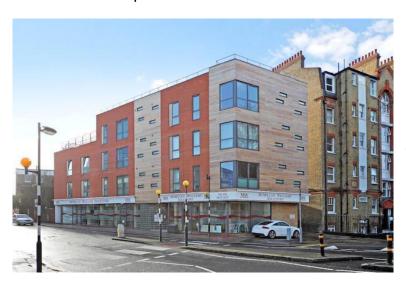
The new 7 and 8 storey residential development on the car park on the north side of Essex Place is far too high. As the application concedes there is presently nothing greater than 5 to 6 storeys high anywhere north of Chiswick

High Road, apart from the Empire House tower itself. Hounslow has regarded this area as unsuitable for high-rise development.

#### 6.2 The corner building on Acton Lane

The 5 storey building on the corner of Acton Lane and Essex Place would also be too high. At maximum it should be no higher than the 4 storey building on the other side of Acton Lane.

Dewsbury Court, a 5.5 storey Edwardian mansion block just off Acton Lane, must not be considered a precedent for encroaching tall buildings northwards from Chiswick High Road towards the station and Acton Green Conservation area. To the contrary this 1908 building should remain the maximum building height and the lower building heights (3 and 4 storeys) along Acton Lane should be the maximum permitted at this location.



LEFT: Existing 4 storey
building across the road from
the Lend Lease corner plot

#### 6.3 Insufficient social infrastructure

The development proposed is high-rise residential development in the wrong place: a location currently earmarked as a Preferred Office Location.

The proposals take away valuable space that is not currently built upon.

Essex Place is not a pleasant thoroughfare and this presents a significant opportunity for improvement. Such improvement does not require the imposition

of two tall blocks of housing comprising characterless slabs with negligible amenity space, and this would not be not be considered for permission as a planning application in isolation.

#### 6.4 Deficit of social amenity

The site and its neighbourhood is one currently lacking in social amenity, apart from retail and public transport. Health, arts, leisure, education and open space are all under pressure. Housing already approved to be constructed in both Hounslow and Ealing is scheduled to exceed targets. Recently built and planned residential development near the site already puts serious strain on the local infrastructure. Areas planned for further residential development do not include this site for these good reasons.

#### 6.5 Extra vehicle capacity

Although the proposed development aims to improve the existing retail space, it makes no provision for the extra vehicular traffic and requirement for parking that this will generate. It justifies the loss of parking space by saying that the Essex Place car parks are no longer used: but that is because the entrances have been closed off!

#### 6.6 Vehicle access

Existing access to Essex Place is awkward and constricted, and the plans do nothing to address this.

As well as cars the access must cater for delivery vehicles including HGVs requiring access to Sainsbury's and the upgraded retail units on Chiswick High Road.

The proposed development is a no car development. Yet it is unrealistic to suppose such a priced development will not be accompanied by significant vehicle access requirements and probably ownership.

#### 6.7 Pedestrian and Cycle Access

The development is said to rely on Turnham Green, Acton Green Common and Gunnersbury Triangle Nature Reserve for access to ground level open space and on access to Chiswick Park tube station. Yet there are no plans for improvement of the poor pedestrian access over the railway line at both the Acton Lane bridge and the Bridge Road railway footbridge. Both require improvement for pedestrians and cycles. It would be unacceptable for any further residential development to take place without significant improvement of both crossings (and/or a new crossing) for pedestrians and bicycles.

#### 6.8 Mix of housing needs

There is an inadequate mix of housing. To date Lend Lease – in one of their presentations – has only suggested that the high-end executive market will be targeted.

There is no evidence of integrating mixed housing needs into this development.

# 7.0 Detail re separate parts of the proposed development

# 7.1 Empire House: permitted development should not entail increased size of Empire House

As detailed below there has been no effort to design the new elevations with any sympathy for the green, the unique heritage buildings of Christ Church, the Town Hall, or other High Road buildings. Rather the aim would seem to have been deliberately to make the entire structure and entrance as prominent as possible, with no concern for the culture and environment of this exceptional area. Empire House currently consists of an office tower that rises 8 storeys above a number of shops at street level. On the roof there is plant and equipment for the maintenance of the building.

#### 7.1.1 Changes to the shops at street level

CHRAG welcomes some of the proposed changes to the shops such as replacing the grey concrete panels with more traditional materials.

Whilst CHRAG does not object to one additional storey above the shops, the additional floor should be recessed not a repetition of the 1<sup>st</sup> floor.

#### 7.1.2 Changes to the entrance to the tower at ground level

CHRAG objects to extending the south elevation of the tower down to ground level. This effectively extends the whole block forwards onto the pavement such that the entrance doorway area projects in front of the line of shops.

Further the style of this new entrance area is proposed to be a featureless 3 storey design of plain glass and monumental 'stone' piers that continue up the full height of the building.

This will draw attention to, and make much more visible, the full height of the tower whereas at the moment shoppers and passers-by are hardly aware of the high tower above.

#### 7.1.3 Changes to the main tower



LEFT: Lend Lease's vision of the future of Chiswick

CHRAG strongly objects to the 48 projecting balconies as indicated spread over 8 storeys up to the 11<sup>th</sup> storey. These should not be integrated into the existing structure as in many similar developments in the area and beyond rather than seeking to extend the floor area to the detriment of the surrounding environment.

The permitted development is for change of use, not for enlarging the floor area or the building.

#### 7.1.4 Changes at roof level

CHRAG supports the proposal to remove the plant at roof level and objects to the increased height said to be 2.4 metres and two additional storeys.

This proposed increase in massing of Empire House should be rejected.

The lack of sensitivity shown by Lend Lease is particularly evident in the design of this new 2 storey structure.

Its white vertical and horizontal banding at such a height above the existing 11 storey building is inappropriate. The horizontal banding would be obtrusively visible from the green and well above the tree-line border at all times of the year, as shown in the photograph from the porch steps into the church.

It is ugly, unacceptable, and an incongruous contrast with the surrounding buildings and architecture.

#### 7.2 Essex Place: no residential development should be permitted

This site is wholly unsuitable for residential use wedged as it is between the Sainsbury's delivery area with its frequent lorry movements especially at unsocial hours.

Some of the car parking spaces could be retained for shop-related use and residential use for the 90 dwellings which already have outline approval. The majority of the space should be used to provide communal amenity space.

Hounslow standards would require about 1800 sq metres of amenity space for the dwellings in Empire House and this could be provided if the north Essex Place site were used for this purpose.

Most effectively this could be provided at ground level atop any car parking and plant room facility proposed to be sited in this area as part of the plan to improve the visual impact of Empire House and to mitigate the social impact of converting to residential.

In addition CHRAG has the following objections. The design of the four townhouses is of poor quality. There is no outside space apart from a "potential green roof". At the rear they overlook the Sainsbury's car park and the delivery yard with Sainsbury's delivery lorries operating late night and early morning. The front doors open directly onto Essex Place.

The two buildings of 7 and 8 storeys add more densely-packed accommodation and introduce an element of high-rise to the centre of Chiswick – in direct contravention of the principals set out in the *Character and Context Study for Chiswick*.

Development should be limited to a maximum of 3 and 4 storeys.

#### 7.3 Essex Place and the "Public Realm"

The development claims to enhance the public realm. The current proposals do not create "a pleasant and enjoyable space".

A child and his dog play centre stage in the Lend Lease image. This roadway serves as the only delivery route for 64 Empire House flats, 50 Essex Place flats, including the 4 town houses, 4 big shops on Chiswick High Road, and the 9 shops on Acton Lane.



The entrance to the road serves a further 21 flats in Acton Lane and bifurcates to provide access to Sainsbury's car park and delivery yard. The traffic on this road will be heavy - the child and his dog playing in the middle of the road are a fiction of the architects' imagination and a misleading visual by the developers.

The high buildings on either side of Essex Place (13 storeys on one side, 7 and 8 on the other) will make it more like a dark windy canyon.

"Promoting pedestrian use of Essex Place through the creation of shared space" simply means putting down some kind of friendly paving. This in no way reduces the amount of traffic.

"Providing opportunity for external integrated play space, seating and general amenity" has actually resulted in no space designated for play; there is one bench shown in the images, and that fronts directly onto the roadway.

The beautifully-drawn planting in the images will have to be very mean to allow for the delivery access. The front entrances from the houses and flats open almost directly onto the roadway with a small amount of tightly controlled planting to protect the first steps out of the houses.

#### 7.4 Corner of Acton Lane and Essex Place

The building faces Chiswick Park Tube Station, an iconic 1930s Art Deco building. It is mid-way between the station and the Old Packhorse, a Grade 2

listed Victorian public house. It is also close to a well-established mansion block built in dark red London stock brick with interesting archway detail.

As mentioned in Section 5.0 Lend Lease has failed to reflect or complement any of these buildings but rather have opted for a pop-up flat pack building of no architectural merit.

The proposed design of this building should be rejected in favour of a building of architectural merit in conformity with local policy.

Overall the proposed development fails to improve the public realm and, if allowed, would represent a significant degradation of the public realm and a blow to sustainable development of this part of the Chiswick area of Hounslow.

#### CHRAG online survey

CHRAG conducted an online survey using best practice software which prevents multiple submissions.

Responses were solicited by means of local leafleting, subscribed mailing list members, local news websites, local meetings, and through social media channels.

CHRAG received over 450 responses between 6th October and 6th November 2014.

The principle findings are as follows;

- 83% believe that this development should either be permitted only with improved amenities or should be rejected outright
- 86% wish the height of Empire House tower to be lower or remain the same height. Only 14% welcome an increase in height.
- 83% believe Empire House should have recessed balconies or none at all
- 56% believe that Essex Place should be developed, but only into mixeduse / residential buildings of 3 – 4 storeys, whilst 30% would prefer this area to be used only as public amenity space.
- Only 14% support the Lend Lease proposal for two 7 and 8 storey blocks
- An overwhelming 94% think the amount of affordable housing should be made public
- Although 27% agree that more housing is needed in Chiswick, 67% are not happy with this particular scheme

Responses were not filtered to exclude non-residents.

The vast majority of the few responses supportive of the Lend Lease proposals were from respondents with IP addresses outside the W4 area.