

Planning Committee 29 January 2015: Agenda Item 5

408-430 Chiswick High Road , Chiswick W4 5TF
00248/408-430/P1; P/2014/ 3288

Joint Comments from the following resident and amenity groups

Acton Green Residents Association (AGRA)
Chiswick High Road Action Group (CHRAG)
Friends of Turnham Green (FOTG)
West Chiswick and Gunnersbury Society (WCGS)

1. Having studied the Planning Officer's Report and taking note of Council Leader, Steve Curran's, recent statement that "The Council is committed to preserving our rich heritage" (in relation to establishing a new Conservation Area in Chiswick) **the above Groups jointly request that the Committee refuse the application for this development.**

2. It is widely accepted that Empire House is out of place in this location – it is a towering and oppressive presence - an unwelcome intrusion on the heritage surroundings of Chiswick Town Centre. We had high hopes that any development in this locality would seek to lessen this building's negative impact in accordance with the borough's planning policy (both existing UDP and the emerging Local Plan).

3. Never did we imagine that anything could be worse than the existing building. However, in contrast to the conclusion reached in the Planning Officer's Report, we strongly believe that, overall, the proposed scheme would do more harm than good.

- The reclad **Empire House** itself will be even more prominent and "in your face" with its protruding balconies, white stone cladding, increased height and massive, atrium-style entrance.
- The new build on the Essex Place and Acton Lane sites would compound the harm to the surroundings.
 - The **Essex Place** 7-8 storey buildings would be visible from all directions and would rise obtrusively above and behind the shops on the Chiswick High Road, damaging the otherwise harmonious skyline by adding asymmetrically to the "intrusion" of Empire House itself – adding insult to injury.
 - The **Acton Lane** site is at an important and prominent location between the High Road and Chiswick Park Station – a gateway to the borough from the neighbouring borough of Ealing. The proposed building is higher than nearby buildings, cramped on its plot, providing no communal amenity space, very limited opportunity for landscaping and no positive contribution to the public realm.

4. The proposals for **public realm** improvements to Essex Place are presented as representing a major public benefit of the scheme. We believe that the amount of development proposed undermines the scheme's ability to achieve any real benefits. Essex Place is a narrow and cramped cul-de-sac and must continue to provide essential access to Sainsbury's shoppers' car park and delivery yard and the rear

service areas of businesses on the CHR and Acton Lane. This traffic will be augmented by that associated with the new development (access to parking, drop-offs, deliveries and servicing).

5. Section 5 of the Report fails to indicate the nature and depth of the objections to the scheme. The 163 objections received (5.2) included detailed, reasoned comments submitted by the four resident/amenity groups named above. The Report refers to a “petition” against the proposal (no figure given); we are not aware of such a petition but CHRAG summarised the 450 results it received to its on-line survey within the comments it submitted. The summary of comments given in the table (5.3) is so abbreviated that we fear that Members of the Planning Committee will be unable to appreciate the significance and weight of these objections.

6. The following comments focus on the **Planning Issues** discussed in Section 7 of the Report.

7. Chiswick Town Centre: Justification for residential use The emerging Local Plan forecasts for housing (7.5) are for the whole of Chiswick, not just for the town centre. Unlike other town centres in the borough, Chiswick already has a good amount of residential; provision of significantly more is likely to upset the healthy balance of retail/commercial and residential uses rather than “enhance the vitality and viability” (7.9). As recognised in the Report Chiswick is already successful (7.12) and meets the Mayoral SPG aspiration of “a high quality, inclusive and liveable place” (7.10). The proposed development of the three linked sites squanders the opportunity to make significant improvements to the townscape (7.13). The proposed scheme is highly unsympathetic.

8. Even if the developer’s arguments for loss of office use held weight, despite the high demand in Chiswick indicated in the Report (7.18- 7.19), this does not mean that it is necessary to depart entirely from the employment use designated in the site allocation of the emerging Local Plan.

9. We question what evidence there is that the impact of office provision in the Chiswick Business Park is to lower the demand for this town centre location. Furthermore in light of the successful conversion of office space to the Moran Hotel (7.20) and of the absence of any information concerning the viability of hotel use, we question how the Report can conclude (7.31) that the case is made to deviate from the proposed site allocation, which includes hotel.

10. The developer’s prior approval (7.26) for conversion of Empire House to residential use (62 flats) deserves little, if any, weight in the context of the current application. Since no external alteration is permitted for such a PA conversion, it is an unattractive proposition, especially given the state of the external facades described in the developer’s Marketing Report recently published for the application:

“The facades are dated and degrading. Wintech Façade Engineering Consultancy ... concluded that ‘given the current condition it should be considered for replacement, in its entirety, to produce a more efficient and modern façade.’ From a re-letting perspective the current dated appearance is going to be a negative factor for any prospective tenant.”

Note also that other former office buildings on the Chiswick High Road (7.20) are not in the Town Centre and other than the Moran Hotel (see above) are not conversions. 500 Chiswick High Road is to be demolished and replaced with a mixed-use residential and office development.

11. Lapsed permission for 12 residential units in a 3- to 4-storey building on the **Acton Lane** site (7.65) does not justify the proposal for 21 units in a 5-storey building. The height and density of the new 6- to 8- storey residential block on **Essex Place** (7.66) is quite unsuitable for this highly compromised site. The 8-storey element would tower uncomfortably above the adjacent 3-storey town houses, the “family dwellings” beside the Sainsbury delivery yard, whose only private amenity space will be their rooftop gardens.

12. **Design and Impact on the Area; Residential** The Report provides a synopsis of the planning policies relevant to this aspect (7.39 – 7.56). Paragraph 7.57 then asks the question “do the alterations and additions to it [Empire House], as well as the other associated buildings of the scheme preserve or enhance the conservation area and meet the design quality espoused in the NPPF.” We strongly contest the assessment in the Report (7.57- 7.66) which maintains that they do.

13. We believe that the scheme is not in accordance with policies in the NPPF, London Plan and the UDP and emerging Local Plan. It fails to respond appropriately to the “identity of a place/sense of place” (7.42 and 7.45) or to reinforce local distinctiveness (7.43), local character (7.44). We believe that the Spatial Strategy for Chiswick and the Context and Character policies (CC 1 – 4) of the emerging Local Plan should be given great weight, especially CC3 and CC4.

14. Empire House is within the Turnham Green Conservation Area and the other two sites are adjoining (7.46- 7.56); to the north is the Acton Green Conservation Area. Chiswick High Road is long and the heights of buildings along the high road further west towards Gunnersbury station (approx 700 metres away) and of those in the Chiswick Business Park are not relevant (7.55) to this application within the Town Centre/Turnham Green Conservation Area. The buildings in the borough of Ealing to which reference is made have no impact on the streetscape of the Chiswick High Road or the area to the north of the High Road. Since Hounslow Council objected strongly to the height of Chiswick Point (off Bollo Lane), it hardly represents a character which Hounslow should seek to extend.

15. As stated above (point 3) we believe that, as now proposed, this scheme neither adequately respects nor appropriately responds to the established character of the area, especially the Turnham Green Conservation Area in which it stands.

- How can adding height to a 1960s building acknowledged to be far too tall for its location (an 11-storey intrusion in a high street of 3- to 4-storey, mixed use buildings) be considered acceptable? Any changes to **Empire House** should make it less dominating not more. We strongly dispute the contention that the proposed design for Empire House has taken cues from the former Empire Theatre that stood on this site (7.59); as shown in the photo in the Report, the theatre was a distinctive, 4-storey building topped by a cupola and with a central arched feature above the entrance.

- If balconies are necessary (7.61) to mitigate for the serious lack of amenity space throughout the scheme, they should be provided within the envelope of the building in order to avoid adding bulk to this building.
- **Essex Place and Acton Lane** (see point 3 above).

16. The proposals for **Public realm** improvements to Essex Place are presented as representing a major public benefit of the scheme. The service vehicle access will continue to be via Essex Place (7.70) and will additionally include that for the 116 residential units in Empire House and Essex Place. The concept of introducing “shared space” in this confined cul-de-sac (7.69) is seriously flawed. The attractive scenes shown in the artist’s impressions give an entirely false sense of space and safety; they omit any traffic (in transit or parked). Furthermore the enhanced public realm proposals only relate to the section of Essex Place between Sainsbury’s delivery entrance and the eastern end of the development. Omitting the key western section from the junction with Acton Lane - the entrance to Essex Place - will seriously undermine any scheme.

17. The serious under-provision of private and communal **amenity and children’s play space** (7.81 – 7.84) is a major negative aspect of the scheme. The report suggests that these shortfalls are acceptable because of the proximity of Gunnersbury Nature Reserve, Turnham Green and Acton Green and Chiswick Common. The residential density of central Chiswick is such that there is already considerable pressure on these open spaces – pressure which cannot be relieved by a financial contribution. The Gunnersbury Triangle is a small and vulnerable nature reserve not a playground. There is a play ground on Acton Green in LB Ealing but the town-centre open space of Turnham Green serves other functions. While these include informal play and sports, there is no formal play equipment.

18. We note with concern (1) the low number of 16 **Affordable Housing** units (7.89) to be provided at Acton Lane site – only 22% even after discounting the PD units in Empire House (target 41%) and (2) the absence of any social rent properties (target 60% of Affordable).

19. In conclusion, we consider that the scheme, as currently proposed, will have a significant negative impact on the townscape and street-scene and/or harm the open space of Turnham Green and will offer very little in terms of real public benefit. **We therefore request the Committee to refuse the application.**