

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

[00248/408-430/P1; P/2014/3288]

Comments from the West Chiswick and Gunnersbury Society

1. Summary

1.1 The West Chiswick and Gunnersbury Society objects to several significant aspects of the proposed scheme. Our objections are detailed below. Many of these issues were raised in writing and discussed with the developers at meetings with them and at the two public exhibitions but no substantive changes have been made to the proposed development. While the developers make much of their engagement with local amenity groups, it is to be deplored that this has not resulted in a more considered design approach reflecting local feedback or in substantive amendments to the scheme.

1.2 The opportunity to rectify one of the major mistakes of the past in respect of Empire House should not be lost by permitting an overall scheme which is disrespectful of the established character of the area. The NPPF states that councils should not accept design that is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions. London Plan policy 7.6 (Architecture) states that consideration should be given to proportion, composition, scale and the proposal should complement the local character of an area.

1.3 One of the ways in which the emerging Local Plan's approach for Chiswick will be achieved is stated to be by "Preserving and enhancing the High Road through:

- recognising and responding to its historic, well-established character of 3 to 4 storey mixed use buildings and promoting sensitive infill development".

WCGS considers that the overall scheme not only fails to do this but also fails to meet the developer's own stated vision and objectives. ["The underlying objective of the application is to deliver a sensitive, yet contemporary design that respects the local vernacular and enhances the character and appearance of the area, including the Turnham Green conservation area and setting of the listed buildings in the proximity of the Site."]

1.4 We disagree strongly with the Summary and Conclusions of the developer's Heritage Report and we question what weight should be given to them in light of the following issues. The Report:

- fails to refer to the emerging Local Plan; the Context and Character policies, for example CC3 concerning tall buildings, are especially relevant
- appears to be overly reliant on a desk-based exercise, a single site visit having been made on a sunny day in April 2014
- makes no reference to Chiswick Park station, an important Listed building within close proximity to the site and contains errors and omissions in relation to other Listed buildings [for example, Chiswick Town Hall is still an important public building with civic (meetings of Chiswick Area forum, public enquiries etc) social and community functions; the Old Packhorse has recently been sensitively refurbished]

- and in relation to the history and development of the area [for example, reference is made to the London General Omnibus Company works but not to the Chiswick Business Park (built over last 15 years) which now occupies the site and has a significant impact on Chiswick]

2. Empire House

2.1 We believe that, as now proposed, this building neither adequately respects nor appropriately responds to the established character of the area, especially the Turnham Green Conservation Area in which it stands. Since a building of the size of Empire House is widely acknowledged* to be out of place in this location, it is essential that every effort is made to lessen its negative impact on its heritage surroundings; these include the Green, Christ Church (now beautifully restored, the Old Pack Horse, recently sensitively refurbished) and other listed buildings. While Empire House currently appears as a dark and brooding hulk, looming over its neighbours, as designed, the reclad building will be even more prominent and “in your face” with its balconies, brightly coloured panels, increased height and massive entrance. It will not represent an improvement.

* including Chiswick Context and Character Study (part of evidence base for emerging Local Plan) which states that Chiswick town centre has low suitability for tall buildings and its sensitivity to change is high; Turnham Green Conservation Area Appraisal (2006).

2.2 We would also dispute the developer’s contention that the proposed design for Empire House has taken cues from the former Empire Theatre that stood on this site. The Heritage Report statement (4.3) that the theatre “was also a contentious addition to the High Road in the 19th century” is misleading; it was the nature of the proposed entertainment (music hall) that was contentious rather than the building’s design (a distinctive, 4-storey building topped by a cupola and with a central arched feature above the entrance).

2.3 Height We welcome the removal of the plant from the roof; we believe that nothing should be added above the main roof-line of the building. We object to the addition of duplex penthouse apartments. As designed, these would actually increase the overall height of the building and the private roof-terraces are likely to militate against providing a visually clean roof-line.

2.4 Balconies While we welcome the absence of balconies on the south façade, we consider that the number and design of those on the east and west facades will present an inelegant and bulky profile when viewed from Turnham Green. This will be compounded when the balconies are in use and cluttered with furniture etc. Bolt-on balconies would introduce an alien feature to Turnham Green Conservation Area. Balconies should be inset within the building instead.

2.5 Entrance We object strongly to the prominent “utilitarian, office-block” design of the entrance as it is totally out of keeping with the local context and character. The building is on the CHR and opposite Turnham Green; this is not an inner-city commercial development site. We strongly recommend that the entrance is redesigned incorporating arched elements which are a common feature of the Listed

buildings in the vicinity such as the church, the town hall and the Old Packhorse. Cues could be taken from the frontage of the former Empire Theatre.

2.6 Other design aspects/Materials We recommend reducing the width of the stone element and avoiding materials that are too bright/white. Noting that the final materials will be subject to approval by Condition, we request the use of a softer palette of colours than is shown in the drawings in the application. Brightly coloured panels on the tower viewed together with the stone frame of the tower and red brick of the side wings would create a visually intrusive feature in the street-scene, detracting from the calm appearance of the Conservation Area.

3. Shops and associated residential units

3.1 We welcome the provision of individual shop units with features such as awnings. We would request the inclusion of glazing bars and stall-risers in accordance with the Shop Front Guidelines DO2. Clarification is required that the facias will be suitable for the installation of externally-illuminated signage by the occupants. Signage zones should be identified as part of the design of the shop-fronts, not left as an afterthought or to individual tenants. A signage strategy for the retail units should be included in any s.106 agreement.

3.2 We request that the heritage value of The Old Pack Horse is better respected by modifying the terrace of the residential units. It is essential that neither the terrace nor its balustrade extends beyond the building line of the Listed building. We also request a Condition that any planting or structures on the roof terraces of these buildings is chosen and maintained so that it does not impact on the skyline.

4. Essex Place

We have consistently questioned the suitability of this compromised backland site for residential accommodation.

4.1 Main buildings If such use is to be permitted, we consider that the proposed height of these new buildings is completely inappropriate for this location. We request that the 7/8-storey element be reduced to no more than 4/5 storeys. At 7/8-storeys the buildings would be significantly higher than surrounding buildings (including Sainsbury). As noted above, the height of Empire House is an aberration and cannot justify further tall buildings; see policy CC3 and related text of Local Plan, including paragraph 6.10 "Hounslow has a number of tall buildings that do not positively contribute to the townscape and their existence should not be grounds for the provision of more."

4.2 The proposed buildings would be visible 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. Any new building on Essex Place must not be allowed to compound the harm to the Turnham Green Conservation Area caused by Empire House; if this latter building has to remain at least it should remain a negative singularity. By way of justification, reference has been made by the developer to the existence of certain local buildings taller than the prevailing 2 to 3-storeys. Arlington Park Mansions are attractive 5-storey Edwardian buildings set back from the Western side of the Green. They have no impact on the skyline of the CHR. While Dewsbury Court (early 20th C) in Chiswick Road has 6 storeys, these include a

semi-basement and the overall height of the building is similar to the recent 4-storey building on the corner of Acton Lane. Significantly, Dewsbury Court is not visible above the roof-line of the buildings along the Chiswick High Road west of Acton Lane.

4.3 Belmont School, Belmont Road is oft quoted as another example to justify height within the hinterland of Chiswick High Road, however this fails to recognise that Victorian and Edwardian Board Schools were designed to be beacons of learning, often the only substantial building to rise above the terraced streets of the new suburbs, in celebration of their progressive ethos and purpose. The new residential blocks do not mark a location, node or land use of particular importance which in any way justifies their height and impact on the townscape.

4.4 No attempt has been made to soften the visual impact of the uppermost floors in long views through the use of architectural devices such as setbacks or mansard roof-slopes, unlike the historical precedents the developers have referred to.

4.5 The narrowness of Essex Place is such that the proposed buildings together with Empire House, might well create a canyon effect along this road undermining the attempt to make it a more pleasant pedestrian route and public space. Furthermore, the 8-storey element would tower uncomfortably above the adjacent 3-storey town houses whose only private amenity space will be their rooftop gardens.

4.6 Town houses While we welcome the introduction of a more domestic and active street scene to Essex Place, we question whether this highly constrained and compromised site in the shadow of Empire House is suitable for family dwellings. In particular, we are concerned that the only private amenity space is provided as roof gardens above and beside the Sainsbury delivery yard and with an 8-storey building immediately adjacent to the east. Siting the only communal play space next to the entrance to the Sainsbury delivery yard and its small area are also of concern. We question the amenity/privacy value to future residents of the very small front “gardens” and their landscape value to the public realm when used for residents’ rubbish and recycling containers as proposed. See comments under Public Realm/Landscaping below.

5. Acton Lane

5.1 We object strongly to the proposals for this part of the site which occupies an important sight line from Chiswick Park station in the adjoining LB of Ealing. Although not addressed in the developer’s Heritage Report, the station is a Grade II Listed building, which lies about 100 m from the site and is an important point of entry to the town centre and the Borough. During early discussions with the developer reference was made to taking design cues from the station. We had therefore expected to see an elegant, building of high design quality providing an attractive, curving entrance to Essex Place. Instead, the proposals for this key building are of a bulky, angular block of uninspired design that will sit uncomfortably on the corner. The building would present a flank wall condition facing south towards the Grade II listed Old Pack Horse and would appear as an over-dominant element in the street-scene when seen in conjunction with the smaller scale buildings around it in views from the junction of CHR and Acton Lane (see comments under Essex Place above concerning

height of buildings in the surrounding area). The building's height and bulk would also have a negative impact on the outlook from Chiswick Road. The cumulative impact of the proposed Acton Lane building and the consented development at 500 Chiswick High Road on this short, curved road with its tree-fronted, terraced "cottages" has not been addressed (see under Public Realm below).

5.2 The building appears overly contrived and cramped on its plot, leaving little defensible space around its base, providing no communal amenity space, very limited opportunity for landscaping and no positive contribution to the public realm. We would request that the proposals are modified to provide a 3-/4-storey building that addresses these design issues and that provides better affordable housing for the sake of future occupants who may be allocated housing in it.

6. Use, Density and Affordable Housing

6.1 The above modifications are considered to be the minimum necessary in order to reduce the negative impact of the proposed development to an acceptable level. We recognise that these modifications would result in a decrease in the overall number of housing units but we believe that such a reduction is appropriate. The developer has sought to justify his proposed quantum of housing by reference to the highest "central" ranges of the density matrix of the London Plan. The site, however, is urban not central and so the relevant lower ranges should be used.

6.2 That the developer has "Prior Approval" for conversion of Empire House from office to residential in no way demonstrates the building's/site's suitability for such use. The Council requested exemption from the Governments' extended permitted development for this and other sites; it stated "the requests for exemption are made on the basis that there will be substantial adverse economic consequences at the local authority level which are not offset by the positive benefits the new rights would bring". According to the Site Allocation in the emerging Local Plan, (March 2014) the Council's proposed use for this town centre Employment site is hotel, office and retail. 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.

6.3 In preliminary comments to the developer WCGS stated "An hotel in this town centre location would be in keeping with the emerging Local Plan. It would be a positive addition to the high-street mix; it would create employment and would put less pressure on the local infrastructure (schools, health services, open space). The sites good PTAL should mean that the hotel would require very little car-parking space. An hotel would also provide opportunities to reconnect to the site's history with references to the Empire Theatre." In addition balconies would not need to be considered for an hotel and hotel usage would cause less light spillage/pollution problems than residential apartments.

6.4 The size of Empire House is such that this part of the site alone accommodates a high number of residential units. Scaling down the proposed developments on the additional parts of the site would provide a more appropriate overall density. More modest developments on these infill sites (both in use until recently as car-parks) would also be in keeping with their small plot-size and their constrained and compromised locations.

6.5 Affordable housing We are seriously concerned as to the lack of information as to the amount of affordable housing. If such housing is, in any case, to be confined to the Acton Lane plot, as suggested it will provide significantly less than the Council's target of 41%. The proposal that none of the small amount of affordable housing that might be provided would be social rented is also contrary to Council's target of 60%. Additional affordable housing could be provided within the Essex Place buildings (for example town houses and accessible units), if any such buildings are permitted.

7. Public Realm/Landscaping/ Amenity space

7.1 We acknowledge that the developer has sought to make much needed public realm improvements to Essex Place. The proposals are presented as representing a major public benefit of the scheme. Hard and soft landscaping is intended to provide a shared "safe and enjoyable" community space which will have pedestrian priority, encourage walking and cycling and provide for quiet recreation and "play on the way" to compensate for the lack of sufficient dedicated on-site play space for young children.

7.2 While we welcome all attempts at improving the public realm of Essex Place (see WCGS comments submitted on the Context and Character study), we question the true scope for the intended uses/activities and whether, in reality, significant benefits will be deliverable. We believe that the quantum of development proposed undermines the schemes ability to achieve the public realm benefits. Essex Place is narrow 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. It is also planned to retain the existing car-parking spaces and add more. 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) and do not show the residents' rubbish and recycling containers which will be occupying the front "gardens" of the town houses.

7.3 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. In addition, as noted above, the space/landscaping around the Acton Lane building is quite inadequate for this entrance. Promoting Essex Place as a pedestrian and cycling thoroughway requires joined-up thinking. WCGS comments submitted on the Context and Character Study emphasised the importance of making a better visual connection between Chiswick Road* and Essex Place to improve legibility. The relevant section of these comments was provided to the developer in March 2014.

* This short, curved road is important to pedestrian and cycle permeability in West Chiswick; this has been improved by the relatively recent change of direction of one-way traffic and provision of a cycle contraflow. The road provides a very useful short cut between West Chiswick and Chiswick Park Station, the Gunnersbury Triangle Nature Reserve, Sainsbury's supermarket and the open space/play area of Acton Green.

7.4 With reference to play space, mention is made of proximity to both Turnham Green and Acton Green. There is a recently extended and refurbished play ground on Acton Green in LB Ealing. The central, town-centre open space of Turnham Green, however, serves other functions. While these include informal play and sports, there is no formal play equipment.

8. Conditions and s.106

In the event of planning permission being granted, we would recommend the following:

8.1 Conditions

- Details of all materials to be used in the external faces of the proposed buildings including colours to be submitted for the Council's approval prior to commencement of development and works to be carried out in accordance with approved details prior to occupation of proposed buildings.
- Details of all hard and soft landscaping including surface materials, boundary treatments and planting schedules to be submitted for the Council's approval prior to commencement of development and works to be carried out in accordance with approved details prior to occupation of proposed buildings.
- Any planting or structure on the roof terraces of any of the buildings to be chosen and maintained so that it does not impact on the skyline.
- A signage strategy for the retail units to include specification of externally-illuminated signs
- Detailed drawings at a scale of not less than 1:20 in plan, section and elevation of the a typical bay of each elevation of each building to be submitted for the Council's approval prior to commencement of development and works to be carried out in accordance with approved details prior to occupation of proposed buildings.
- No Permitted Development rights for extensions to new dwelling houses.

8.2 s.106

- Public transport improvements – Gunnersbury station capacity and accessibility
- Highway and public realm improvements to Essex Place, to include section from Acton Lane to Sainsbury delivery yard entrance
- Improvements to Turnham Green open space
- Tree planting on Chiswick High Road