

250 Gunnersbury Avenue, Chiswick W4

00535/250/P14

Comments from the West Chiswick and Gunnersbury Society (WCGS)

The Society objects to this application and requests that planning permission is refused.

It should be noted that, when we met with the developer in the summer of 2019, we were not broadly positive. We indicated that we had supported the consented scheme and that we strongly supported the protection of the Power Road LSIS. We asked many questions about co-living as we were unfamiliar with this concept.

1. Use

1.1 The Society objects strongly to the inclusion of residential accommodation at this site for two reasons. Firstly, we object in principle to the proposal to provide residential accommodation bordering the North Circular Road. This stretch of the North Circular is recognised as the most congested road in the UK; the air pollution and noise levels are such that it is unsuitable for residential development. Policy P3 (f) of the Reg 19 version of the Local Plan Review for the Great West Corridor states: “requiring new residential development to be designed to mitigate any noise and air quality issues and is sensitively located away from the A4/M4 and *North Circular* roads.”

1.2 Secondly, we object to any form of residential accommodation at this key site within the Power Road LSIS. A Prior Approval for conversion of part of the next-door building is no justification to permit more residential within the LSIS. Permitting such use is contrary to Policy GWC1: Employment Growth e) Protecting the Locally Significant Industrial (LSIS) function of Power Road and supporting opportunities for its intensification for broad industrial type uses as set out in Draft New London Plan Policy E7 and to GWC East Policy E3 c) Strengthening Power Road as an employment location and an enhanced hub for creative industries. Residential use on this site would seriously undermine the Council’s objectives for the LSIS. If residential uses were to be introduced on to Power Road through the proposed Co-living scheme, further commercial space might well be lost to residential use given the likely impact on land values.

1.3 The internal layout of the consented office development for this site could be modified to provide workspaces suitable for creative SMEs and would provide a higher level of employment than the current proposal.

2. Type and Quality of accommodation

2.1 Chapter Five of the Local Plan identifies the borough’s needs with respect to housing, including that for specific sectors such as students and Policy SC3 within this chapter identifies the mix of units to meet the needs of the Borough in conformity with London Plan policy 3.10. A need for large-scale, shared-living accommodation has not been identified. We are unaware of any market evidence for a need for co-living accommodation in this area.

2.2 The applicant indicates that the 204 co-living units would be equivalent to 113 “normal” one-bed units. These would be adding to the existing serious over-provision of studio/one-

bed units in schemes in the area, including the large-scale schemes associated with the Brentford Stadium and on Capital Interchange Way. If this scheme is permitted, the overall mix of units within the Great West Corridor East area will depart significantly from that required. Moreover a significant proportion of these schemes are Build to Rent (BtR). The cumulative social impact of rental schemes comprised of small units with short-term tenancy arrangements targeted at a mobile / transient workforce is potentially very negative. It is likely to result in “churn”; it would not promote community cohesion or sustainable, inclusive and mixed communities.

2.3 WCGS considers that the quality of accommodation within the proposed development is very poor. Over 75% of the very small units are single aspect including 27% north-facing and none have any private outdoor space. The communal indoor living spaces only provide 7.3m² per unit and some of this space is obscure-glazed because of over-looking problems. The only outdoor communal space is provided by means of a small courtyard and roof terraces. While these are south-facing, the size and proximity of the adjacent building at 272 Gunnersbury Avenue (12.5 metres tall and only 2 metres from the proposed development) will render much of this space of no or very limited value.

2.4 While co-living developments have been approved in several parts of London and are provided for within the new London Plan, we suggest that this concept should be reconsidered in the light of the current coronavirus pandemic and the likelihood that similar situations will arise in future. In promoting his scheme’s communal living, the applicant refers to research highlighting the *risk of social isolation* for young people in London. However, an important consideration for the Council as the local health authority is what responsibility it would have for residents in such a development should there be a government requirement to practice self-isolation and/or social distancing. While students in similar accommodation may be expected/required by university authorities to return to the parental home, what action would co-living residents be expected/able to take?

3. Scale, height and design

3.1 The height of the current proposal is unacceptable in terms of its negative impact on the local townscape and on heritage assets (especially Gunnersbury Cemetery and Gunnersbury Park). It conflicts with the design framework and building height strategy for the Great West Corridor (Reg 19 version of the Local Plan Review for the Great West Corridor) and does not comply with NPPF para 17, 193 London Plan 7.1, 7.4, 7.6, 7.7, 7.8 and Local Plan CC1, CC2, CC3, CC4.

3.2 Townscape The Power Road estate is an important area located beyond the main artery of the Great West Corridor; it is sited between this artery and the Chiswick Business Park. Throughout its emerging policy documents for the Great West Road, the Council recognises the distinct identity of the estate. The Council also recognises that, in order to achieve its aim of enhancing the estate’s role as a "creative hub" for SMEs, it is important to celebrate its heritage and to respect the relatively fine grain and intricate character of the estate. The estate is characterised by low-rise buildings; those on Power Road itself are generally below 10 metres and those fronting Gunnersbury Avenue a little higher (the highest structure at 19 metres is a “fin” rising above the main roofline of 272 Gunnersbury Avenue). The buildings adjacent to the application site are 8.8 metres on Power Road and 12.5 metres on Gunnersbury Avenue. The recently constructed car showroom at the corner of Gunnersbury

Avenue and Chiswick High Road is of three storeys (12 m) to the front of the site with the fourth (16 m) set back towards the rear. Any new development needs to pay full respect to the character and context of the estate in terms of scale, height and design.

3.2.1 The proposed building at 54 metres AOD (42.2 metres above ground) is far too high; the change in scale and height between it and neighbouring buildings is excessive. It would appear as a massive intrusive structure dominating the estate and its surroundings. It would dwarf Power Road Studios and Chiswick Studios, the attractive buildings Locally Listed as good local examples of Art Deco industrial architecture. We request that the height is reduced to between 12 and 24 metres in line with the Masterplan Capacity Study for the Great West Corridor [Policy GWC5(h)]. As noted above, the site is outside the main corridor and is not one identified as appropriate for a tall or focal building. A building of the proposed height would seriously undermine the design framework and compromise the legibility and landmark role of the putative focal buildings.

3.2.2 We recognise that the 7-storey office building, which we supported, was 29.5 m above ground. We point out, however, that permission was granted for this building and the slightly taller 8-storey replacement before the Great West Corridor plans with their hierarchy of building heights based on the capacity study were well-developed.

4. Heritage

Please refer to section 4 of WCGS comments submitted in March 2020 on “The 4th Mile” as the general points concerning harm to heritage apply equally to this application.

4.1 The proposal would have a significant adverse impact upon views from Gunnersbury Park and Gunnersbury Cemetery as can be seen from the Built Heritage, Townscape and Visual Impact Appraisal (HTVIA). It is considered unacceptable to argue that the impact would be “negligible” as it would simply be adding to the harm associated with other schemes in the area (either consented or under consideration).

4.2 Reliance cannot be placed on the screening provided by existing tree cover as, apart from the effectiveness of the screening being seasonal, a significant proportion of the mature boundary trees within Gunnersbury Park may be removed within the next 15 – 20 years. Some have already been felled and others may need to be removed due to disease or because they are reaching the end of their natural life span. The incidence of disease may increase and the life span of trees may decrease due to the impact of pollution and climate change. Replacement trees will not provide the same amount of screening.

4.3 The unacceptability of placing reliance on trees to shield or screen a development has been established at the Public Inquiry on the Chiswick Curve and was confirmed by the Royal Botanic Gardens, Kew, Historic England and the Council at the recent Public Inquiry on the Citroen site on Capital Interchange Way (see Closing Statements within Inquiry documents). The Inspector at the Chiswick Curve Inquiry said “trees have a limited lifespan, they can be destroyed or damaged by high winds ... and there are many reasons, including disease why they sometimes need to be modified or removed completely, and that, as such “[i]t would be wrong, therefore to rely on the presence of a tree or trees to justify impact.”

5. Public transport

5.1 The site is not well served by buses; there is no bus route along the North Circular and the No. 440 no longer serves Power Road. Additional bus services or increased frequency of existing services are most unlikely to be delivered in the short to medium term due to the congested road network. A recent TfL consultation <https://consultations.tfl.gov.uk/buses/routes-70-and-27> responded to a WCGS proposal to extend Route 70 beyond the northern end of the Chiswick Business Park by stating “Extending it would expose it to heavy traffic around Chiswick Roundabout which would affect reliability.”

5.2 The applicant makes reference to the proximity of various means of public transport such as rail and underground stations. However, the PTAL of the site at 3 -4 is only moderate and, in any case, PTAL values only reflect proximity and frequency of service. Station access and capacity are of equal importance. The nearness of a station is immaterial if it cannot cope with demand. Both Gunnersbury Station and Kew Bridge Station have significant access problems and Gunnersbury Station also has severe capacity problems.

5.3 As the Council is well aware, the overcrowding at **Gunnersbury station** is such that TfL currently operates crowd control measures during peak hours. This is necessary because of the conflicting movements of local residents entering the station and local business employees leaving the station during the morning peak and vice versa in the evening. The conflict is caused mainly by the narrow, two-way stairway to the single island platform, serving both Underground and Overground trains. The Council is working with TfL, Network Rail and the owner of Chiswick Tower to explore how the much needed major improvements to access and capacity might be delivered. We are aware from our participation in the Gunnersbury Station Action Team, that no such improvements are likely in the short to medium term.

6.Planning Balance WCGS considers that little weight can be given to any benefits claimed for this proposed development and conclude that any such benefits are completely outweighed by the multiple negative impacts of the scheme detailed in these comments including the harm and cumulative harm to townscape and to heritage assets that the development would inflict.

The Society requests that planning permission is refused.

7. Without prejudice to our objection to this application, should planning permission be granted, we request the planting of a small number of street trees in Power Road in order to enhance the public realm and provide environmental services (especially with respect to air pollution). It would also be appreciated if, in co-ordination with TfL, additional trees could be planted on Gunnersbury Avenue. On completion of the work to replace the Power Road bridge, TfL planted several trees but insufficient to replace the large number felled. Before commencing this work, TfL felled a large number of mature street trees on both sides of Gunnersbury Avenue, together with trees along the B&Q and cemetery boundaries and those above the north-east railway embankment which provided screening for the residents of Manor Court.

WCGS,
May 2020