

Pre-application Advice



**London Borough
of Hounslow**

Development Management

Application Details

Reference:	00248/388/PRE1 PRE/2019/4125	Officer:	Leo Hall leo.hall@hounslow.gov.uk
Meeting date:	16/01/2020	Date:	27/02/2020
Applicant:	Executors or Late Mrs S.P. Orchard-Lisle		
Agent:	Mr Alfie Yeatman: ayeatman@hghconsulting.com		

Site

Address:	364-368 Chiswick High Road, W4 5TA
Ward:	Turnham Green

Proposal

- Redevelopment of the site, retaining retail use at ground floor with 8 residential accommodation above.

Drawings and Supporting Information

Pre-Application Statement. Received: 17/02/2020. Cover Letter, Townscape Visual Impact Assessment and Heritage Statement. Received 14/12/2019.

Recent Planning History

None relevant

Development Plan

Hounslow's Development Plan comprises the Hounslow Local Plan (2015), the West London Waste Plan and the London Plan (2016).

The Local Plan is available to view on the Council's website here:

http://www.hounslow.gov.uk/index/environment_and_planning/planning/planningpolicy.htm

Local Plan:

- SC1 Housing Growth
- SC3 Meeting the need for a mix of housing size and type
- SC5 Ensuring Suitable Internal and External Space
- CC1 Context and Character
- CC2 Urban Design and Architecture
- CC4 Heritage
- TC1 Town and Neighbourhood Centre Network

- TC2 Ensuring the Future Vitality of Town Centres
- EQ1 Energy and Carbon Reduction
- EQ2 Sustainable design and Construction
- EQ5 Noise
- EQ7 Sustainable Waste Management
- EC2 Developing a Sustainable Local Transport Network

London Plan:

- Policy 3.3 – Increasing housing supply
- Policy 3.5 – Quality and Design of Housing Developments
- Policy 5.15 – Water use and supplies
- Policy 6.9 – Cycling
- Policy 6.13 – Parking
- Policy 7.4 – Local Character
- Policy 7.6 – Architecture

Other relevant documents include:

The Council has also produced a Residential Extension Guidelines (2017) Supplementary Planning Guidance document; the purpose of which is to provide clear advice on what the Council consider to be acceptable forms of extension to residential properties.

Local Plan designations

Turnham Green Conservation Area

Other Constraints

Flood Zone 3a
Chiswick Town Centre
Primary Shopping Frontage

Comment on proposals

Context:

The subject site is a two-storey terraced building located to the north of Chiswick High Road, falling within a primary shopping frontage of the Chiswick Town Centre and the Turnham Green Conservation Area. At present, the ground floor comprises a bank (A2) and bakery (A1), whilst the second floor (set back from the street) contains ancillary office/staff space.

Adjoining to the east and west are two-storey buildings of differing styles, whilst to the north is a four storey building at nos. 1 to 6 Dolman Road which contains residential flats. To the rear is a small yard and a covered passageway leading to a rear out-building through to Dolman Road.

Proposal

The proposal seeks to demolish the existing building and replace it with a four-storey block consisting of retail at ground floor (238 square metres) with eight new residential units with outdoor amenity space overhead made up of six 1-bedroom 2-person units and two 2-bedroom 4-person units (471 square metres). The main residential entrance would be from the rear on Dolman Road via a new gate/access, whilst on the front elevation a retail frontage would be retained.

Principle

On the basis that the existing shop/commercial unit will be retained, expanded and enhanced, no land use concerns arise from the scheme.

Sustainability

No details on sustainable design or construction statements have been included in this pre-application submission. In line with Local Plan Policy EQ2, we would expect the development to be carbon neutral from the outset, with an energy statement included in any submission detailing how the development will be zero carbon and will meet London Plan standards. This will involve achieving at least 35% below Building Regulations and offsetting any surplus with a contribution to the Council's Carbon Offset Fund (at a rate of £95 per tonne); any shortfall on this 35% minimum benchmark would need to be justified robustly and compensated through further payments to the COF.

In addition to the above, any development proposal will need to meet the standards for sustainable design and construction set by the London Plan, including any of the 'optional' Building Regulations requirements it adopts. For Residential Development, we expect you to demonstrate that maximum water consumption would be 105 litres/per person/per day in accordance with London Plan Policy 5.15. Energy consumption should comply with Part L of the Building Regulations.

Character and appearance of the area

London Plan policies 7.4 (local character) and 7.6 (architecture) require well-designed proposals that will respect the appearance and character of their surroundings. This is supported by Policies CC1 (context and character) and CC2 (urban design and architecture) of the Hounslow Local Plan. Policy CC1 recognises the context and varied character of the borough's places, and seeks to ensure new development conserves and takes opportunities to enhance their special qualities and heritage. Policy CC2 seeks to retain, promote and support high quality urban design and architecture to create attractive, distinctive, and liveable places.

The site falls within the Turnham Green Conservation Area where development should respond sensitively to local character and the existing surroundings. The Turnham Green Conservation Area Appraisal notes that "*other than the obtrusive height of Empire House, the general scale of the area has been maintained*" and as such it is essential that any developments going forward respect the established two/three-storey typology of the area as far as possible and seek to preserve Turnham Green itself and its open setting.

The Appraisal also identifies as a pressure to the area “*development [which] tries to maximise the scale and density even where not necessarily appropriate*” and instead invites high-quality but smaller scale re-development of less attractive buildings, along with improvements to shopfronts and signage. Meanwhile, the Council’s Context and Character Study for this section of the Borough also identifies the area as having a high design quality and sensitivity to change and as being unsuitable for tall buildings.

It is acknowledged that subject to full details of materials and finishes, the proposed four-storey redevelopment would improve the overall design quality of the site and achieve a higher-quality and more legible shopfront. However, the Council continues to have concerns with the height of the building, which we maintain should not be more than three storeys. The proposed fourth floor element has been amended to have a 3.45 metre set-back from the street, and the scheme as a whole is tiered with each level stepping back from the street to reduce its scale, bulk and dominance when viewed from both Chiswick High Road and from Turnham Green. Both aspects are considered positive; however, if a fourth floor is included in any submission, it would need to be fundamentally invisible from the street.

It is also noted that the revised submissions continue to show the primary residential entrance being to the rear of the building, accessed from Dolman Road; whilst the quality of this entrance has been improved in the amended plans and we welcome enhancements to the pavement and general character/legibility of Dolman Road, the Council’s strong preference is still for the main entrance to be on the front (i.e. Chiswick High Road) elevation.

In addition to the above, as part of any submission we would want to see full details upfront of the proposed detailing (including section drawings to show window reveals, to ensure they are adequately recessed) and varying material pallets, particularly for the rear elevation, which at present still appears somewhat incoherent.

The applicant is also strongly encouraged to consult the Council’s Shopfront Design Guidelines SPD for reference on what the Council expects for new shopfronts in Conservation Areas.

The above details will all be of utmost importance to secure a high-quality scheme for such a prominent location.

Impact on neighbours

Policy CC2 (urban design and architecture) of the Hounslow Local plan expects proposal to provide adequate outlook, avoid overshadowing, and ensure sufficient sunlight and daylight to proposed adjoining/ adjacent dwellings. Policy SC4 (scale and density of the housing development) states the Council will ensure protection of the existing residents’ amenity.

Subject to full site checks, we do not feel that there would be any material harm to neighbours’ living conditions by way of loss of light, outlook or privacy.

Quality of accommodation

The Technical Housing Standards from DCLG have internal space standards for new dwellings. All development should meet these standards to ensure that they provide acceptable living conditions for future occupiers. Policy SC5 of the Local Plan requires that these standards are met and also that appropriate amenity space is provided for new development. Furthermore all units must provide sufficient light and outlook and should be dual aspect as far as possible, as well as meet relevant noise and air quality standards and lifetime home standards.

The proposal as currently shown would provide eight new flats with an expanded and enhanced retail provision at ground floor. Each of the units would meet the required internal space standards, which is good, and whilst it is regrettable that none of the units would be dual aspect and some of the rooms do not have the best quality of outlook, if justified robustly this may be acceptable.

In addition, each flat would provide a policy-compliant quantum of private amenity space, with several of the flats benefitting from a sizeable excess. Notwithstanding this, none of flats would have access to communal amenity space to accord with Policy SC5, and whilst two of the flats would have a private provision covering both the private and communal requirements (which exempts them from the communal space requirement), the other six flats would have a shortfall amounting to a demand for 100 square metres of communal amenity space, and this shortfall would need to be justified very robustly in any planning application.

Given the site's location on the busy and polluted Chiswick High Road, we also have significant concerns about the air quality for prospective residents of flats fronting onto the main road, and would require a detailed air quality report (in line with the Council's Air Quality Action Plan and Local Plan policies) to be submitted in any application demonstrating measures which would be taken to mitigate the issue and secure an adequate and sustainable quality of living accommodation. You have revised the plans to show winter gardens at first floor, which is an improvement, but you would also need to demonstrate that these winter gardens (and the flats themselves) would not get overheated and would be adequately ventilated, particularly in the context of these first floor flats being single aspect. On upper floors we would also need to be convinced that having an open air amenity space would be acceptable from an air quality perspective.

Transport

A car-free development would be in line with the sustainable transport aims of the London Plan, policy EC2 of the Local Plan and the Council's Air Quality Action Plan, and any future residents would need to be restricted from obtaining parking permits. Cycle storage is shown on the plans, but the applicant should indicate that the number of cycle spaces complies with London Plan standards for both the commercial and residential elements and is provided by way of Sheffield stands spaced at least one metre apart. The applicant should refer to the West London Cycle Parking Guidance for extra information.

Full details of waste and recycling for the commercial and residential elements would also need to be provided in any submission, in accordance with the Council's *'Recycling and Refuse guidance: Guide for Architects and Planners submitting applications to Hounslow Council'* (ask officer for this to be forwarded through).

Making an application

The government's Planning Portal explains how to apply for planning permission. You or your planning agent should use the Planning Portal to lodge your application electronically with the Council.

The Planning Portal website address is:

<http://www.planningportal.gov.uk/planning/applications/howtoapply>

To enable us to consider your proposal, you must submit the correct application form and include the necessary drawings and supporting information, as well as pay the relevant fee. We have validation checklists that set out the requirements for making a valid planning application for different categories of development. These checklists are available on the Council's website here:

[file:///lbh-ctxrpf-01/folderredir\\$/leo.hall/Downloads/Full_Planning_Application_Major_Minor_Checklist_jan20.pdf](file:///lbh-ctxrpf-01/folderredir$/leo.hall/Downloads/Full_Planning_Application_Major_Minor_Checklist_jan20.pdf)

Community Infrastructure Levy

Some new developments granted planning permission will be liable to pay Community Infrastructure Levy (CIL) to the Mayor of London and Hounslow. Where a development results in a net floor increase in floor area of more than 100 sqm, or where a new residential unit would be created, the levy is payable at the following rates:

Hounslow CIL: £200 per sqm

Mayoral CIL: £60 per sqm

If you need more information about CIL please visit the Council's website here:

http://www.hounslow.gov.uk/index/environment_and_planning/planning/hounslows___community_infrastructure_levy.htm

You can also contact our CIL team by email at: planningcil@hounslow.gov.uk

Conclusion

The principle of demolishing the existing building and redeveloping the site to create enhanced retail provision with residential accommodation overhead may be acceptable in principle, subject to amendments to address the issues raised in the above assessment especially to the proposed height and quality of accommodation.

As part of any application, we would require full details of the materials, finishes and detailing (including window reveals/drainpipes/meter boxes etc.) and would expect to see confirmation of the uses of any neighbouring windows which might be affected, to ensure that all neighbouring amenities (privacy; light; outlook) are preserved. We would also need you to submit further details of servicing such as waste and recycling and cycle storage, to meet Local and London Plan standards, and would need to see justification of the shortfall in communal amenity space for six of the flats.

Furthermore, it is essential that you provide evidence of the building being carbon neutral and sustainably designed through the submission of a detailed Energy/Sustainability Statement, and we will also require a detailed air quality assessment demonstrating that the proposed flats would be healthy and habitable.

Accompanying this we also need evidence that they would also be adequately ventilated and would not be prone to overheating.

Issued by			
Officer:	Leo Hall	Manager:	Melek Ergen

We provide these views and opinions in good faith and without prejudice to formal consideration of any planning application, which will be subject to formal consultation and ultimately decided by the Council. We cannot guarantee that any application made would be valid or would be approved. If there is a material change in circumstance or new information comes to light then less weight may be given to this document.

If you require a further pre-application meeting on this subject, this will attract a further, reduced, fee.

These works will require Building Regulation Approval. Please contact buildingcontrol@hounslow.gov.uk for more information about the services that my colleagues provide.