

APPENDIX 7.1
HERITAGE STATEMENT

September 2020

SYON GARDENS

HOMEBASE BRENTFORD SITE, TW7 5QE

HERITAGE STATEMENT

Consultant: KMHeritage



Syon Gardens
Homebase, Syon Lane, Isleworth TW7 5QE

Heritage Statement

September 2020

Consultancy for the
Historic Built Environment

KMIHeritage

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1 Introduction

- 1.1 This report has been prepared to support a planning application for proposals affecting the Homebase site, Syon Lane, Brentford, TW7 5QE. The report has been prepared for St Edward Homes Limited, a joint venture between M&G Investments and Berkeley Group.

Background

- 1.2 St Edward Homes Limited is bringing forward the redevelopment of both the Tesco Osterley and Homebase Brentford sites. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site.

The proposed development

- 1.3 The description of the proposed development is as follows:

"Full planning application for the demolition of existing building and car park and erection of buildings to provide residential units, a replacement retail foodstore, with additional commercial, business and service space, and a flexible community space, and ancillary plant, access, servicing and car parking, landscaping and associated works".

- 1.4 The key elements of the development comprise:
- Delivery of 473 high quality homes;
 - 38% affordable housing (on a habitable room basis);
 - A new and modern Tesco retail store of circa 10,550 sqm (GIA);
 - Community space of 200 sqm;

- 137 sqm (GIA) of flexible commercial, business and service space;
- 400 retail car parking spaces;
- 100 residential car parking spaces;
- 3 residential visitor car parking spaces and 2 car club spaces;
- 204 retail cycle parking spaces;
- 896 residential cycle parking spaces;
- Building heights include a four-storey podium with blocks ranging up to seventeen storeys;
- Communal residential amenity space with biodiverse podium gardens including open space and children's play space;
- New active frontages and improved, safer public realm along Syon Lane and the Great West Road; and
- Dedicated new pedestrian and cycle friendly 'clean air' route provided between Syon Lane Station and the Great West Road via Syon Gate Way and new eastern street, Syon Gate Lane.

Purpose

- 1.5 The purpose of the report is to assess the proposed scheme against national and local policies relating to the historic built environment.
- 1.6 This report should be read in conjunction with the accompanying drawings and Design & Access Statement prepared by Patel Taylor Architects as well as other application material.

Nomenclature

- 1.7 The location of the proposed development is referred to as ‘the site’ or the ‘Homebase site’ throughout this report.
- 1.8 In 2015 English Heritage changed its name to Historic England and a new charity, officially called the English Heritage Trust, took the name of English Heritage and responsibility for managing the National Heritage Collection of more than 400 state-owned historic sites and monuments across England. In this report reference is made both to ‘English Heritage’ and ‘Historic England’.

Organisation

- 1.9 This introduction is followed in Section 2, by a description of the history and evolution of the site and its surroundings. Section 3 assesses the heritage significance of the site and its heritage context. Section 4 sets out the national and local policy and guidance relating to the historic built environment that is relevant to this matter. An outline of the proposed scheme and its effects is provided in Section 5. Section 6 assesses the proposals against that policy and guidance. Section 7 is a summary and conclusion.

Author

- 1.10 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. He was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect and has a specialist qualification in urban and building conservation.
- 1.11 Drafting, research and analysis was carried out by Anne Roache MA MSc. Anne is a conservation professional who

has extensive experience working for leading commercial organizations in the fields of property, planning and law.

- 1.12 Baseline historical research was carried out by Jonathan Clarke, MSocSci. Jonathan is experienced historic environment professional, with more than 25 years' experience working in the historic built environment sector including for English Heritage and the Royal Commission on the Historic Monuments of England.

2 The site and its context

The site

- 2.1 The site is located on the Great West Road in the London Borough of Hounslow at the southern junction with Syon Lane. It comprises a rectangular plot of land of approximately 1.4 ha. and is developed with a large single level Homebase store (4,180sqm) and car parking (295 spaces).
- 2.2 Bounded by the A4 Great West Road to the north, and Syon Lane to the south-west, there is car showroom premises to the east, and a service road, Syon Gate Way extends along the south-eastern boundary. Parallel to this road is the railway line which serves Syon Lane station to the south of the site. The surrounding area comprises a mix of uses including commercial and residential development. There are semi-detached houses on the western side of Syon Lane, immediately opposite the site. Along the Great West Road there is a variety of commercial and industrial uses but it becomes mainly residential west of Syon Lane.
- 2.3 The sites is discussed later in this section, in the context of the heritage assets that may be affected by development on it. However, the site is not considered to possess heritage significance in itself. This is notwithstanding the presence of the existing Homebase building, which is the subject of a Certificate of Immunity from Listing granted in 2019.

A brief history of the area

- 2.4 Brentford was established before the Roman occupation of Britain and was established at the confluence of the River Brent and the Thames at the first point on the tidal portion of the Thames that was easily fordable by foot. The London Road, which runs north east to south west through Brentford towards the equally ancient settlement of Isleworth, is an ancient trackway adapted by the

Romans' to link their cities of London and Bath. The most ancient part of the Parish boundaries however are those formed by the Rivers Thames and the Brent.

- 2.5 London Road runs north of Syon Park and most of the long-established tracks over the hitherto open fields of the parish were converted to roads after the enclosures beginning in 1818 thus maintaining the historic pattern of those main routes (fig. 1).



Figure 1: Brentford area, OS 1856

- 2.6 Syon Lane follows an ancient route through the open countryside running north-south across the old London Road through what is now Syon House park to the church and from there to the River Thames and the ferries which crossed the river between it and Richmond. Being accessible to the Court of Kew Palace, Isleworth became home to several grand villas, including the Duke of Marlborough's Syon Hill at its southern end and Osterley Park at its northern end. Marlborough Cottage stood on

the east side of the Lane built by one of the Duchesses of Marlborough as a 'place of retirement'.

- 2.7 Wyke Manor lay at the northern end of Syon Lane and comprised of 104 acres of farmland and woods on either side of Wyke Lane (now part of Syon Lane). It was, by 1570, held by Sir Thomas Gresham together with Osterley. In 1778, Wyke Manor was purchased by John Robinson MP who modernised the manor house renaming it Wyke House. In the 19th century, the rebuilt house became a school then later a private lunatic asylum which use it maintained until the late 20th century. Despite being a Grade II listed building, it was demolished in 1978. The Wyke Green Golf Club (founded 1928) occupies some 90 acres of the old grounds of Wyke House to the east of Syon Lane. Wyke Green itself, now reduced to a few acres, still exists as an open green.

Syon House and Park

- 2.8 Syon House is the London home of the Duke of Northumberland. Originally the site of a medieval monastery the Abbey became forfeit to the Crown in 1539, then on the Dissolution of the Monasteries. The site was leased to the 1st Duke of Somerset, who built as Syon House in the Italian Renaissance style before his death in 1552. Syon passed by marriage to Henry Percy, the 9th Earl of Northumberland in 1594. The building standing today is essentially the same house with later remodelling. In 1750 the 1st Duke of Northumberland, inherited the estate and commissioned Robert Adam to remodel the house and the landscape architect Lancelot 'Capability' Brown to work on the grounds. Extensive interior works were completed between 1762-69 and Capability Brown continued to work on the landscape for the next 20 years during which time he extended the landscaped grounds to the north and west and created Pleasure Grounds to the north, both centred on large new ornamental lakes. The 3rd Duke of Northumberland initiated a series of major works at in the 19th century. The House remains in

private ownership and has been opened to the public since 1968.

The 19th century

- 2.9 During the 19th century the economy of Brentford and Isleworth was dominated by market-gardens supplying London which covered 875 acres in 1840. The use of glass houses intensified the type and variety of crops that could be grown including both fruit and flowers. Heston was noted for cherries, and Hounslow for roses and other flowers. In 1921 just over 1000 persons in the parishes of Heston and Hounslow were employed in farming, gardening, and other work on the land. This number had fallen to 434 by 1951. Alongside this largely agrarian economy industries such as milling, brickfields, breweries and pottery flourished alongside some manufacturing.
- 2.10 In 1849 the Windsor, Staines & South Western Railway opened their loop line from Barnes to Feltham as far as Smallberry Green (now Isleworth) Station and in the following year the loop was completed through Hounslow Station. The Hounslow and Metropolitan Railway (now the District line of the London Underground) was opened in 1883 with a station at Thornbury Road and its terminus on the site of the present bus garage in Hounslow High Street. Streets of houses were begun to be laid out in anticipation of an influx of the professional class that would hopefully be attracted to the new suburbs by these improved transport links, but the expected rush did not materialise.

The Great West Road¹

- 2.11 The greatest single effect on the economy of the area was the opening of the Great West Road in 1925. The new road by-passed to the north the agricultural landscape of Brentford and Hounslow triggering a decade of development which transformed these districts out of all

¹ A more detailed history of the Great West Road can be found as Appendix A

recognition. The first factory, Firestone's, opened in 1928 and over the following ten years more modern, streamlined Art Deco-style manufactories followed until they lined the road between Chiswick roundabout and Syon Lane giving the stretch the moniker of the "Golden Mile". No commercial buildings were built further west along the Great West Road (A4) after Syon Lane (Gillette Corner) as the land was owned and reserved by the Church Commissioners. Alongside this manufacturing the area saw a high number of offices, workshops and showrooms established which created a wide variety of products from cars to razor blades. The number of these establishments rose from 82 in 1911 to almost 200 by 1957 with many employing more 1,000 persons each (fig. 2²).

² Marshall, J. (1997) The Great West Road Then & Now, Brentford & Chiswick Local History Journal 6. Online: <https://brentfordandchiswicklhs.org.uk>

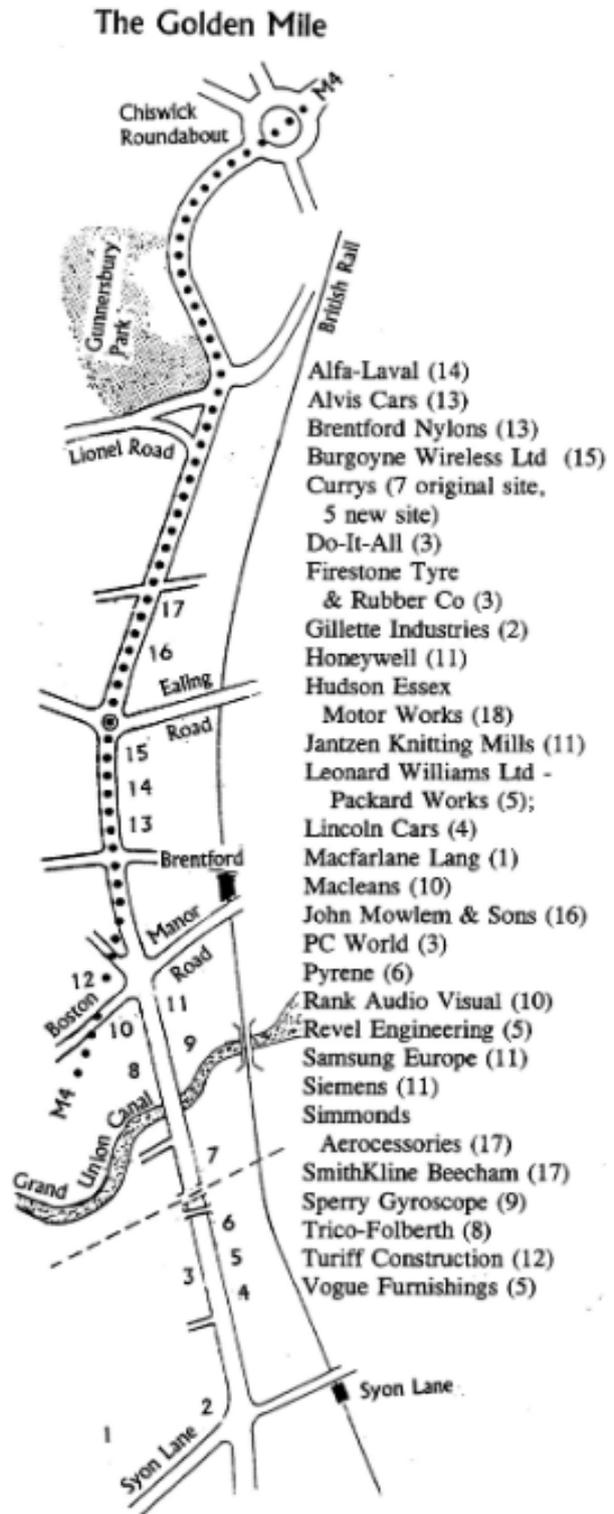


Figure 2: The companies of the Golden Mile in its heyday

- 2.12 One of the notable buildings remaining from the heyday of the Golden Mile is the former Gillette factory designed in 1937 by Sir Banister Fletcher. The landmark building, which is grade II listed, gives its name to Gillette Corner, the junction of Syon Lane and the Great West Road. Its high brick tower surmounted by a four-faced neon-illuminated clock can be seen from afar both day and night. Gillette Corner also marks the border between Osterley and Brentford. Gillette moved production to Poland in 2006 and the building has lain empty ever since.
- 2.13 To the west of this Gillette Corner, inter-war suburban housing quickly spread across the fields and orchards in order to house the 1000s of workers drawn to the area. By 1938 the whole network of residential streets, with completed houses, was in place. Syon Lane station was opened in 1931 to serve their needs and the Piccadilly Line was extended in 1933 with the former Hounslow and Metropolitan Railway station at Thornbury Road being replaced in 1934 by the present Osterley Station, designed by S. A. Heaps and Charles Holden.
- 2.14 Much of the remaining open land behind the factories along the Great West Road was used as sports grounds and today these dominate the northern part of Syon Lane, with football clubs on the west side and rugby clubs on the east.
- 2.15 Post-war the changes brought about by the shift in the manufacturing economy away from its traditional centres coupled with cheaper imports and well as labour shortages, saw the manufacturing powerhouses of the Great West Road fall into decline. The post-war extension of the Great West Road eastwards into central London and the construction of Chiswick roundabout and flyover between 1957 and 1959 also saw a decline in the commercial heart of Brentford.
- 2.16 No Historic Area Assessment has been produced for the former 'Golden Mile', or for Brentford as a whole. Designed to help explain the character of a place and

define its significance, it seems clear that should such an exercise be undertaken for ‘Gillette Corner’ and its hinterland, the importance of the Great West Road in attracting and shaping showpiece factories, and stimulating suburban housing, would figure prominently. Its construction changed irrevocably the northern part of Brentford, bringing a dual carriageway carrying ‘a huge volume of westbound traffic’³ that was lined with showpiece factories and fringed with (mostly) privately developed housing. This transformed the northern part of Brentford, changing it from an area of farmland and historic estate parkland, to one of (or bisected by) light industry and interwar housing.

- 2.17 The Victoria County History described Brentford as comprising, by 1954, three distinct districts, the northernmost characterised by the factories in the Great West Road, and the surrounding municipal and private interwar housing. This northern district owed little to Brentford’s earlier historical development; in terms of historic character and sense of place, the urban corridor formerly known as the Golden Mile shows more affinity with the rest of the Great West Road (and other London bypass routes) than with the older, predominantly 19th-century core of Brentford to the south. Linear transport routes have always created their own morphologies that superimpose or bisect established landscapes – whether canals in the 18th century, railways in the 19th century, or bypass roads in the interwar period. The Great West Road – and especially its ‘Golden Mile’ – was archetypal of London’s roadside interwar industrial architecture – indeed, once, an ‘industrial Arcadia’⁴. Together with Western Avenue, and the linking North Circular Road, it

³ Harold Clunn, *The Face of London* (1963), 502.

⁴ *Observer*, 31 August 1980, as quoted in Diane K Bolton, Patricia E C Croot and M A Hicks, ‘Ealing and Brentford: Growth of Brentford’, in *A History of the County of Middlesex: Volume 7, Acton, Chiswick, Ealing and Brentford, West Twyford, Willesden*, ed. T F T Baker and C R Elrington (London, 1982), pp. 113-120. British History Online <http://www.british-history.ac.uk/vch/middx/vol7/pp113-120> [accessed 4 September 2019].

constituted, between the wars, ‘the single greatest concentration of industry in the country, running from Wembley through Park Royal south and west to Twickenham’⁵.

The Homebase site

- 2.18 The site was open fields up until the 1920s when the construction of the Great West Road brought an avalanche of new industrial and residential developments to the area (fig. 3⁶).



Figure 3: The area of the site (starred), showing market gardens, Syon Lane and the railway line to the south, OS 1897

⁵ Gavin Weightman, Stephen Humphries, Joanna Mack *The Making of Modern London* (2007), 136.

⁶ London OS (Edition of 1894-96) LXXXIII (Ealing St Mary; Heston and Isleworth; New Brentford; Old Brentford) Revised: 1893 to 1894. Published: 1897.

2.19 The 1936 OS map shows how the area has started to change as a result of the arrival of the A4 (fig. 47). The site is now home to the Isleworth Winery plant; later the VP Wine Company, known as sherry importers (fig. 5). The aerial photograph of 1935 shows the site and its immediate surroundings including the Gillette factory and recently built housing (Fig. 6⁸).

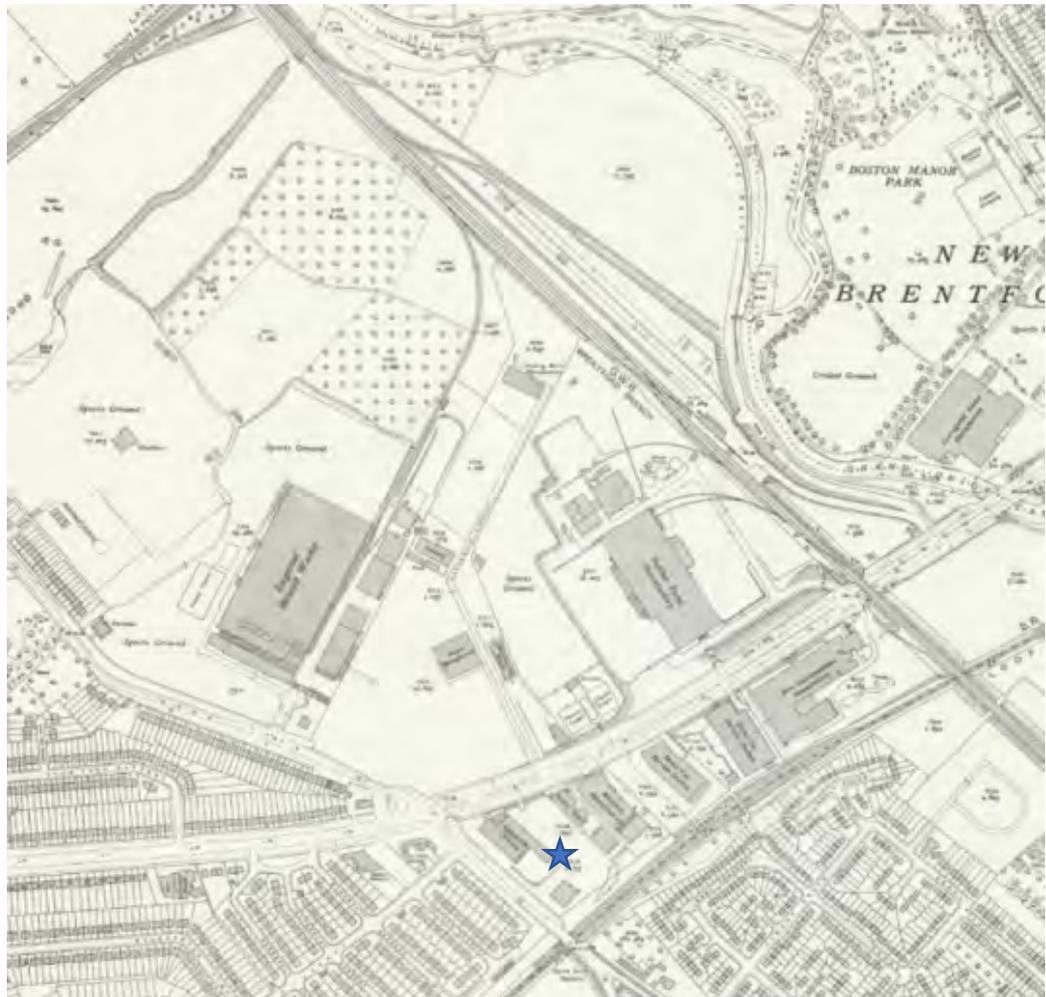


Figure 4: The area around the site (starred), OS 1936

⁷ OS Middlesex XX.4 (Ealing St Mary; Heston and Isleworth; New Brentford; Old Brentford). Revised: 1935. Published: 1936.

⁸ Britain from Above: EPW050304 © © Historic Environment Scotland



Figure 5: The site (outlined), OS 1936



Figure 6: The site of the Isleworth Winery (outlined) with the Gillette building opposite, 1936

2.20 By 1961, extensive light industrial, as well as residential, development that has taken place during the course of the 20th century (fig. 7⁹).

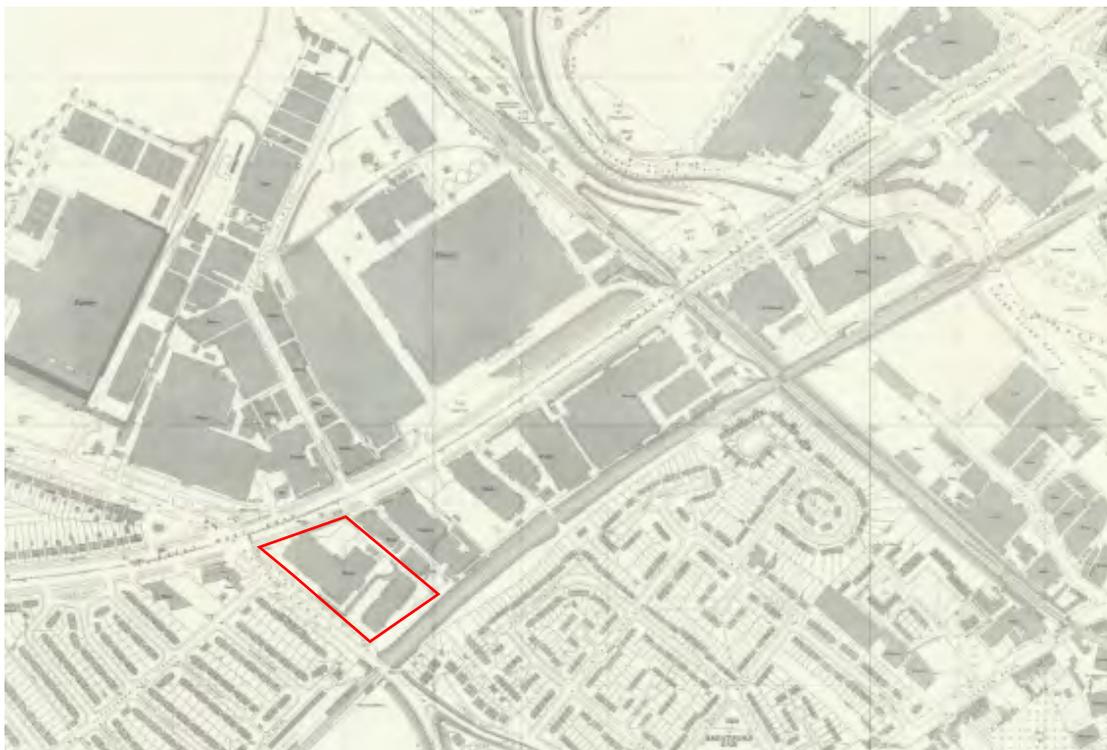


Figure 7: The area around the site (outlined), OS 1961

The Homebase building¹⁰

2.21 Homebase commissioned Nicholas Grimshaw & Partners to design a flagship store for this brownfield site in 1986. The brief called for over 4,000m² of column-free enclosed space, the avoidance of a flat roof, and as many car parking spaces on a level site as possible. Nicholas Grimshaw sketched out his first designs for the store in September 1986. It was constructed, on the site of what

⁹ TQ1677-TQ1777 - A (includes: Heston And Isleworth; Kew; New Brentford; Old Brent, 1961.

¹⁰ A more detailed description of the genesis of the Homebase store can be found in Appendix B.

had been the manufacturing plant of the Isleworth Winery, between 1987-98 and was open by June 1988.¹¹

- 2.22 The Homebase building is not statutorily listed nor is it on Hounslow's Local List. On 3rd December 2019 a Certificate of Immunity from Listing was issued under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, as the Secretary of State does not intend to list this building to which the notice relates for a period of five years.¹²

¹¹ A more detailed description of the genesis of the Homebase store can be found in Appendix B.

¹² Historic England: Certificate of Immunity Number: 1467343. Start Date: 03-Dec-2019 / Expiry Date: 02-Dec-2024.

3 The heritage significance of the site and its surroundings

Introduction

- 3.1 This section of the report describes the heritage and townscape significance of the site and its surroundings. Emphasis is placed on heritage assets as key components of overall townscape character.
- 3.2 The Greater London Historic Environment Record (GLHER) was consulted in order to identify heritage assets in the vicinity of the site. Appendix B contains a GLHER map showing the distribution of those assets.

World Heritage Site

- 3.3 The site lies approximately 700 metres to the north of the Isleworth Riverside Conservation Area (CA 11), which partially contains the Buffer Zone of the UNESCO World Heritage Site of the Royal Botanic Gardens, Kew. The nearest point of the World Heritage Site to the site is at a distance of approximately 1.5 km. The Royal Botanic Gardens World Heritage Site Buffer Zone extends to include Syon Park on the opposite bank of the River Thames.

Conservation areas

- 3.4 The Homebase site is not located within a conservation area. Nearby conservation areas include The Butts (CA 3); Isleworth Riverside (CA 11); Osterley Park (CA13); Grand Union Canal & Boston Manor (CA 22); and Spring Grove (CA 24) (fig. 8¹³).

¹³ London Borough of Hounslow (undated) Conservation Areas map.

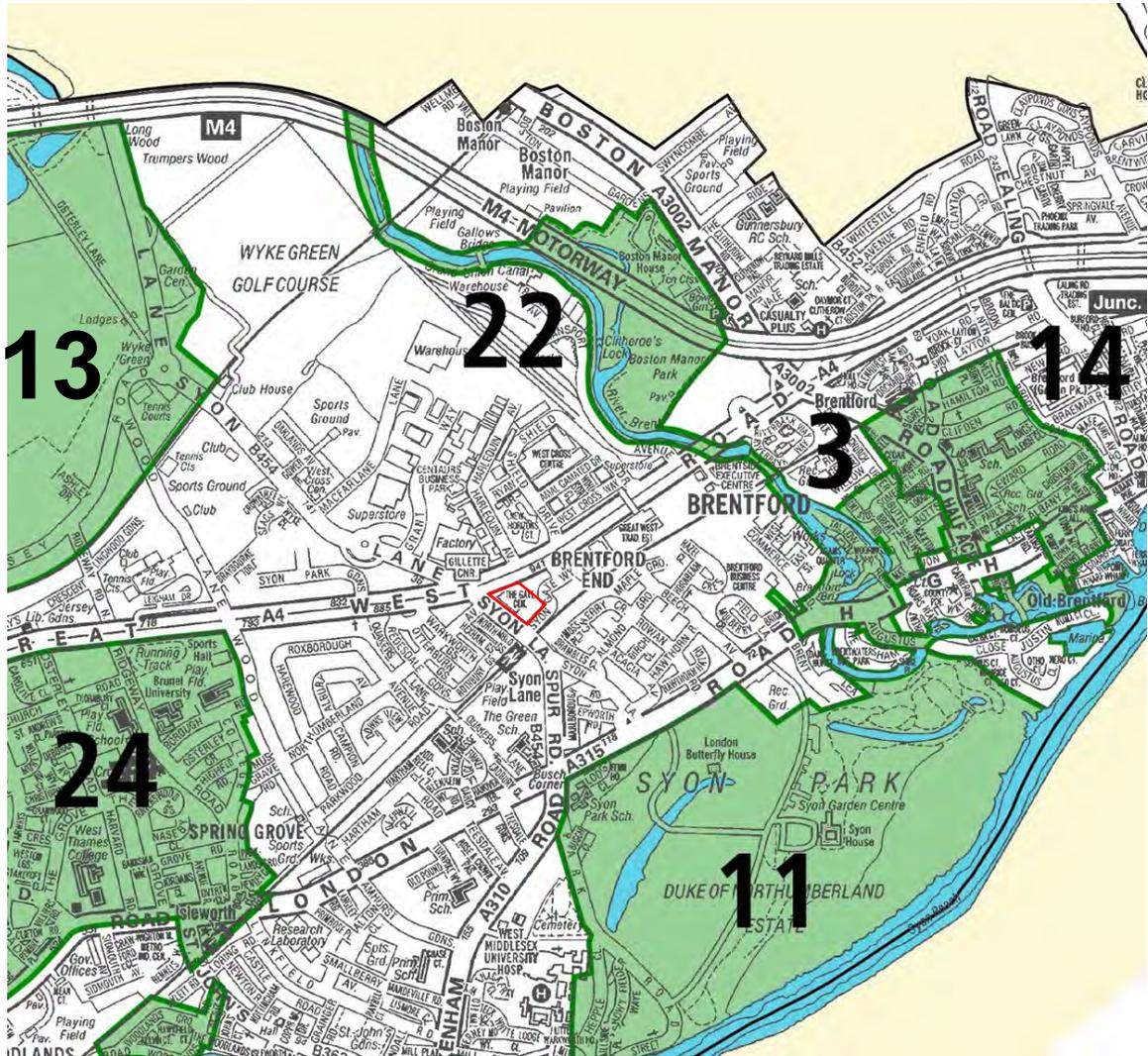


Figure 8: Conservation areas in the vicinity of the Homebase site (outlined in red) – see Figure 9 below

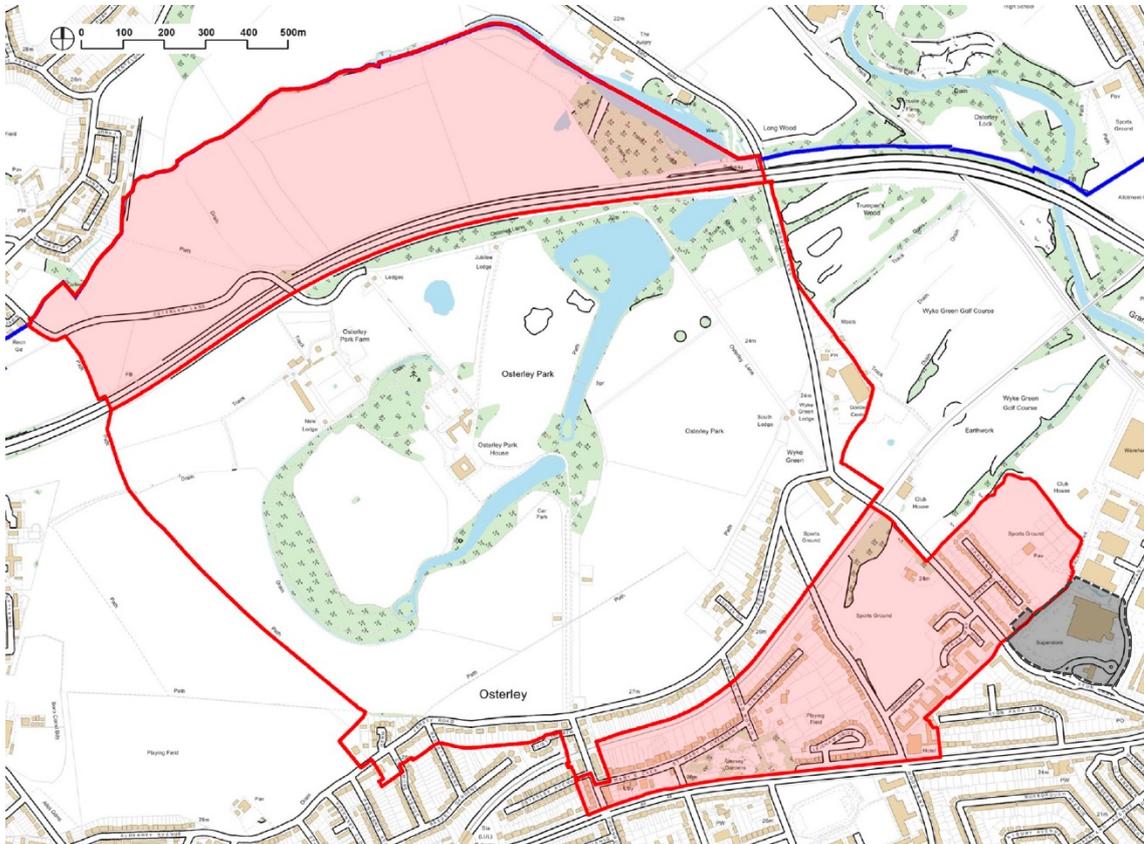


Figure 8: The 2019 extension to Conservation Area 13, Osterley Park: extensions designated in 2019 are shaded red. The site is indicated in grey tone and dotted line.

Listed buildings

3.5 There is a high number of listed buildings in the Brentford area (fig. 10¹⁴). They include:

Grade I

- Boston Manor House
- Osterley House
- Osterley House Stables
- The Aviary in Osterley Park
- The Temple in Osterley Park
- Syon House

¹⁴ Historic England, National Heritage List for England online <https://historicengland.org.uk/listing/the-list>

- Syon House Conservatory, Gate Lodge and Gates; Boathouse and 'Flora's Column', Syon Park.

*Grade II**

- Quaker Meeting House, Quakers Lane
- Syon Lodge and Gates, London Road
- Osterley Park Roman Bridge

Grade II

Borough Road

- Lancaster House

Boston Manor Road

- Stables of Boston Manor House
- Garden Wall and Gateway to Boston Manor House

Gower Road

- Pavilion and clubhouse

Great West Road

- Former Coty factory, part of premises at junction with Harlequin Avenue (now Syon Clinic)
- Former Firestone Factory, central gates, gate piers and railings to the former factory
- Former Gillette building, front block and return wings of main Gillette building at junction with Syon Lane
- Former Gillette building, four lamp standards with lanterns outside the main entrance to the Gillette building at junction with Syon Lane
- Church of St Francis of Assisi, No. 865
- National Westminster Bank, No. 880
- Westlink House, former Pyrene II Factory, No. 981;
- Former warehouse for Curry's Ltd., No. 991

High Street, Hounslow

- Gallows Bridge (over Brentford Canal) Grand Union Canal

Jersey Road

- Osterley Park: Farmhouse, lodges, gateways and piers, garden walls, outbuildings and bridges and decorative artefacts within the park

London Road

- Coach and Horses Public House
- Park Cottages, Nos. 191-199
- No. 280 (in grounds of Marlborough School)
- Rose and Crown Inn

Park Road

- Syon Park: Porter's Lodge, Dairy, Stables, Former Riding School, Gateways, Garden Walls and decorative artefacts within the park including the lake bridge.

Syon Lane

- K6 telephone kiosk outside Gillette Building;

Twickenham Road

- Busch House School
- Thanet House

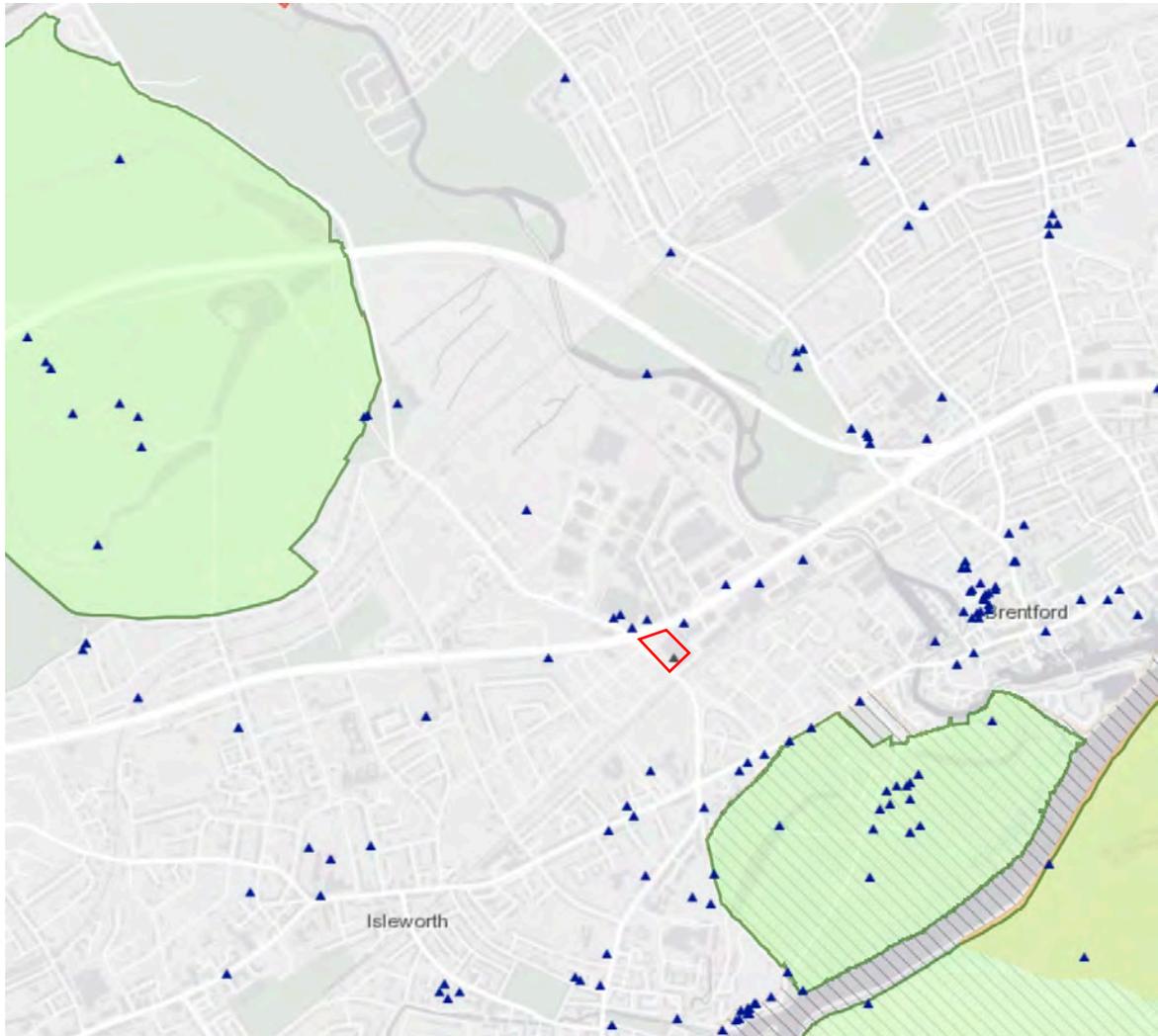


Figure 10: Listed structures (triangle) near the Homebase site (outlined in red). Green shading indicates registered landscapes and the hatching indicates the World Heritage Site buffer zone (the World Heritage Site itself is indicated in light green on the bottom right). See also Figure 13.

Registered landscapes

3.6 The following landscapes are included in the Register of Historic Parks and Gardens maintained by Historic England for its special historic interest. This is a statutory designation, established by the Historic Buildings and Ancient Monuments Act 1953.

Grade I

- Royal Botanic Gardens, Kew
- Syon Park

Grade II*

- Osterley Park

Locally listed buildings

3.7 There are numerous buildings or groups of buildings in Hounslow that are not statutorily listed but are considered to be of local significance.¹⁵ This may be due to their townscape or group value, their contribution to the overall character of the area, their inherent architectural qualities or historic association. Those near the site include:

Great West Road

- No. 891;
- No. 764, Former Brentford Park Hotel;

London Road

- No. 11;

Quakers Lane

- Angel House walls;
- Green School for Girls;

Park Road

- Isleworth Cemetery Lodge;
- Isleworth Cemetery Mortuary;

Syon Lane

- Wyke Farm Barn

Assessing heritage significance: concepts and terminology

3.8 The listed buildings, the conservation areas and registered landscapes are ‘designated heritage assets’, as defined by the National Planning Policy Framework (NPPF). Locally listed buildings or structures can be considered as ‘non-designated heritage assets’.

¹⁵ London Brough of Hounslow (2019) Local List, September 2019.

- 3.9 ‘Significance’ is defined in the NPPF as ‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic’. The Historic England ‘Historic Environment Good Practice Advice in Planning Note 2’ puts it slightly differently – as ‘the sum of its architectural, historic, artistic or archaeological interest’.
- 3.10 ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ (English Heritage, April 2008) describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value.

The relevant heritage assets

- 3.11 In assessing the significance of the site and its surroundings, the relevant heritage assets fall into two general categories:
- Heritage assets (designated and non-designated) within the immediate vicinity of the site, clustered around the junction of Syon Lane and the A4. These include the Osterley Conservation Area, the Grade II listed buildings such as the Gillette building, the adjacent National Westminster Bank, the former Coty building (now Syon Clinic), the curtilage structures of the former Firestone factory, the Church of St Francis of Assisi, etc. This category also includes the nearest locally listed building, at 891 Great West Road (‘Adini’).
 - Highly graded designated heritage assets further afield that may be affected by the proposed development by virtue of its potential scale and visibility in their settings, notwithstanding their distance from the site. These include the World Heritage Site, the registered landscapes and their listed buildings and other Grade I and II* listed buildings.

- 3.12 That is not to say that Grade II listed buildings and non-designated heritage assets further afield are of less significance, but that their significance is less likely to be affected by the proposed development. It is considered that the nature of the Grade I and II* registered landscapes are more likely to experience an effect from the development.

Heritage significance: general discussion

‘Evidential value’, ‘Historic interest’ or ‘Historical value’

- 3.13 The Homebase site, and the surrounding buildings and their relationship to one another and to the nearby conservation areas collectively illustrate the western urban expansion of this part of London; especially during the first half of the 20th century. Historical value is described as being illustrative or associative. The story of the site, as part of the Great Western Road, illustrates a good deal about how London evolved from earliest times to the present day, about the transformation of the suburbs brought about by the improvement in transport links and about social change and lifestyles in that period. The area and its buildings are a record of social and economic change and lifestyles in various periods, and illustrate the effect these things had on the historic landscape.
- 3.14 In terms of English Heritage’s¹⁶ ‘Conservation Principles’ the heritage assets described above provide us with ‘evidence about past human activity’ and, by means of their fabric, design and appearance, communicate information about the past. The site’s commercial use, along with other sites on the A4, illustrates the general development of the area.
- 3.15 The manner in which the area and the site itself has changed in the course of the 19th, 20th and 21st centuries is illustrative of the urban historical process and an understanding of that process assists the understanding of how this part of London has evolved over time.

¹⁶ Now Historic England

'Architectural interest', 'artistic interest' or 'aesthetic value'

- 3.16 The heritage assets identified above also possess varying degrees of aesthetic significance by virtue of their design and appearance. Aesthetic significance derives from the display of certain styles of architecture, such as the Art Deco style of the Gillette building and others around it on the A4, and from linked qualities such as materiality, etc.
- 3.17 It is clear that the conservation areas, registered landscaped, listed buildings and locally listed buildings have 'architectural' and 'artistic interest' (NPPF) or 'aesthetic value' ('Conservation Principles'). In respect of design, 'Conservation Principles' says that 'design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship'.
- 3.18 The contributing elements of the aesthetic significance of site and its surroundings are the nature of older (listed and unlisted) structures and their contribution to the streetscape, and that streetscape itself. Some more recent buildings harm the setting of the listed buildings in the vicinity of the site, for instance. The retail sheds to the north east of the site are examples, as is the large Tesco Osterley store and the Sky campus facility. These structures have no architectural or aesthetic merit whatsoever, and detract from their surroundings, whether designated or not. The Homebase site – containing a single large and largely blank building surrounded by surface car parking – is similarly unsympathetic, though clearly it possesses greater architectural quality than other buildings in the vicinity and is associated with the architect Nicholas Grimshaw. There is, in general, a marked contrast between the quality and clear aesthetic quality of, say, the Gillette building and the late 20th century/early 21st century commercial buildings around it.
- 3.19 The listed buildings near the site have, by definition, special architectural interest and, in respect of development at the site that might affect their setting,

that special interest has to do with their external architectural design, their scale, massing, materiality and roof profiles. Their internal special interest would clearly not be affected by adjacent development.

Heritage significance: specific comments

Heritage assets within the immediate vicinity of the site

- 3.20 The listed buildings in the vicinity of the site (and the locally listed building at 891 Great West Road – ‘Adini’) exist in a highly heterogeneous built environment, whose unifying factor is a wide and busy multi-lane highway. Building age, form and quality is extremely varied. The A4 is a historic route and the commercial evolution of the area in the 20th century caused the building of the various listed buildings identified earlier. The earliest of those identified was built in 1928, the latest in 1937 – what historic character the immediate area around the site has was created by a series of Art Deco buildings built in a very short period between the wars, and without any overarching urban design or context. As listed buildings they have clear special architectural or historic interest deriving from their architectural style, form the architects who designed them (notably Wallis, Gilbert and Partners) and their original uses. They are very much object buildings of note in an otherwise incoherent and mundane environment dominated by traffic and by lesser quality later development that detracts from their special interest.
- 3.21 The Homebase site cannot be considered as enhancing the setting of heritage assets in its vicinity. It may have some architectural quality and it is associated with the architect Nicholas Grimshaw, and cannot be accused of the ugliness that the Tesco store indisputably represents. However, its principal failing is its occupation of its site. The site is, essentially, a shed in the middle of a car park, an object building surrounded by ill-considered vacant space. This detracts from the older listed buildings in the vicinity.

Heritage assets further afield

- 3.22 The most significant heritage assets in the wider context of the site comprise the Kew World Heritage Site and its registered landscape, the highly graded registered landscapes of Osterley Park and Syon Park and their listed buildings, as well as specific highly graded listed buildings such as Boston Manor House (Grade I) and Quaker Meeting House, Quakers Lane (Grade II*). There are obviously Grade II listed buildings in the broader area surrounding the site, but the assets identified above are those with the greatest heritage significance and thus with a higher sensitivity to change.

Syon Park and Osterley Park

- 3.23 These are two significant former country estates exhibiting the familiar elements of the overarching typology of the country house – a great house in a specific relationship to a designed landscape, forming a hierarchy from the house itself through its immediate ancillary buildings to particular designed features of the landscape. A fundamental aspect of their heritage significance is how these original or intended qualities have been affected by change. Such change includes the loss of original function and change of use, physical change arising from these things and the encroachment of the city and 20th century transport infrastructure. Both estates nonetheless retain a high level of heritage significance.
- 3.24 This commentary is not intended to provide an exhaustive or detailed assessment of the heritage significance of either estate, but focusses on the significance of these estates that may be affected by the proposed development.

Syon Park

- 3.25 Syon House is listed Grade I, and the list description is as follows:

1. 4419 *PARK ROAD, ISLEWORTH Syon House TQ 1776*
33/361 15.6.51.

II GV

2. *Built on remains of a Brigittine Abbey nunnery (1430-70). Part of C15 undercroft remains. Protector Somerset reconstructed the house in 1547-52, substantially in its present shape. The house, 3-storeys with crenellated top and gable turrets, is built on a hollow square. East front ground floor loggia mid C17. Remodelled inside and out by Robert Adam 1767-5. In 1874 the Percy Lion, transferred from Old Northumberland House at Charing Cross was erected on the river front. Slight war damage, 2nd floor of North West tower rebuilt; 2 statues on columns in anteroom destroyed. Vide RCHM; p86; Country Life V, p112, XLVI, pp728, 802, 838, 874. Associated with the house; Catherine Howard 1541-2, Protector Somerset, executed 1552; John, Duke of Northumberland and Lady Jane Grey, both executed 1553; the nuns recalled from the Netherlands 1557-8; Henry Percy, Earl of Northumberland, involved in the Gunpowder plot; the children of Charles I; Charles II in the plague of 1665 and the Dukes of Northumberland of 1766 who still hold it.*

Syon House and its Lodges form a grade I group.

Listing NGR: TQ1728276685

- 3.26 The other listed structures of the estate are principally located to the north and north west of the house. They are: Syon House Conservatory, Gate Lodge and Gates; Boathouse and 'Flora's Column' Syon Park (Grade I); Syon Lodge Gates (Grade II*) and Porter's Lodge, Dairy, Stables, Former Riding School, Gateways, Garden Walls and decorative artefacts within the park including the lake bridge (Grade II).
- 3.27 The site now includes a 20th century garden centre, a hotel and a large area of surface car parking.

3.28 The list description for the Grade I registered landscape describes in overall term the 'C17 formal terraced gardens which were landscaped in the mid C18 by Lancelot Brown. Extensive development of the pleasure grounds continued in the later C19 and mid C20'.

3.29 It continues:

Syon Park is situated c 6km to the west of the centre of London¹⁷, c 1km south-east of Brentford. Gunnersbury Park (qv) lies 2.5km to the north-east, with Chiswick House (qv) c 4km to the east. The Royal Botanic Gardens, Kew (qv) lie c 250m to the east, on the opposite bank of the River Thames.

The c 80ha site is bounded to the north-west by London Road (A315). Residential and industrial developments form the boundary to the north. The River Thames provides the eastern boundary and Park Road the western boundary. A small residential development, Busch Close and Lodge Close, borders the site in the north-west corner. The largely level site slopes gently down to the River Thames. Brick walls of C17, C18, and C19 dates (listed grade II) mark the boundary to the north and west along much of London Road and Park Road.

3.30 It continues:

The main part of the pleasure grounds, occupying c 10ha, lie to the north and north-east of the House, with the Wilderness (c 7ha) to the south-west. The two areas are linked by the East Lawn.

3.31 The proposed development site is approximately 1 km north west (to the centre of the site) from the west-facing entrance to Syon House.

3.32 The heritage significance of Syon House and its landscape can be summarised as follows:

¹⁷ This is incorrect, or relies on an unusual definition of 'the centre of London'. Syon House is, in fact, over 13km from Charing Cross.

- It is an example of the country house typology and of a medieval structure adapted to become a country house in the 18th century by a notable architect of the period (Robert Adam). It is of very high internal and external architectural interest for these reasons;
 - It possesses a series of ancillary structures that have their own architectural interest in varying degrees;
 - In addition to its designer, the site has various historical associations;
 - The built structures sit in a designed landscape, associated with Lancelot Brown but containing various other phases of development.
- 3.33 The proposed development will have no *direct* effect on this significance; it will affect the setting of the various assets that make up the Syon site. That effect is examined in Section 5 of this report, but it is possible to identify that the effect will be confined to one aspect of the significance of the site – that upon the sense of openness that is experienced in the landscape around Syon House. This, in turn, is a function of the design of that landscape.
- 3.34 The list description for the registered landscape makes clear that ‘the drive from Park Road became the main entrance in the late C20 when the Lion Gate from London Road was permanently closed’. It continues:

The former main entrance is marked by a screen and entrance archway (listed grade I) designed by Robert Adam in 1769. This is a unified composition of two single-storey square lodges connected by a colonnaded screen and with a central arched gateway. The Archway, topped by a Northumberland lion, is hung with iron gates, the columns being filled in with railings of a similar style. The drive from the Lion Gate was made in the mid C18 and wound across the northern parkland, crossing Brown's lake before linking up with the Great Lime Avenue.

- 3.35 It is clear from the historical account and the physical evidence that, in terms of views and openness, significance is related to the layout of the buildings and the landscape. Syon House forms part of an almost exactly east-west axis. To the east, the house has views of the Thames and of Kew. To the west, there is firstly an oval forecourt, terminated by the two early 17th century battlemented lodge houses. Beyond this, the Great Lime Avenue extends to the lake. Figure 11 illustrates the hierarchy of views created by the geometry and positioning of the buildings and park. This geometry and positioning is a core component of their design and thus their significance – the axial, symmetrical arrangements of landscapes, focussed on a great house, are a notable feature of 18th century landscape design.
- 3.36 It is clearly the case that the pastoral element of the Syon landscape has significance in its own right. However, by the inherently more varied and informal nature of that element, its significance relies less on what is seen in specific views than those elements of the Syon landscape that are more ordered and geometrical. Its significance relates to its original purpose as farmland and the experience of going through it, as much as what can be seen from the house or when looking outward from the site.

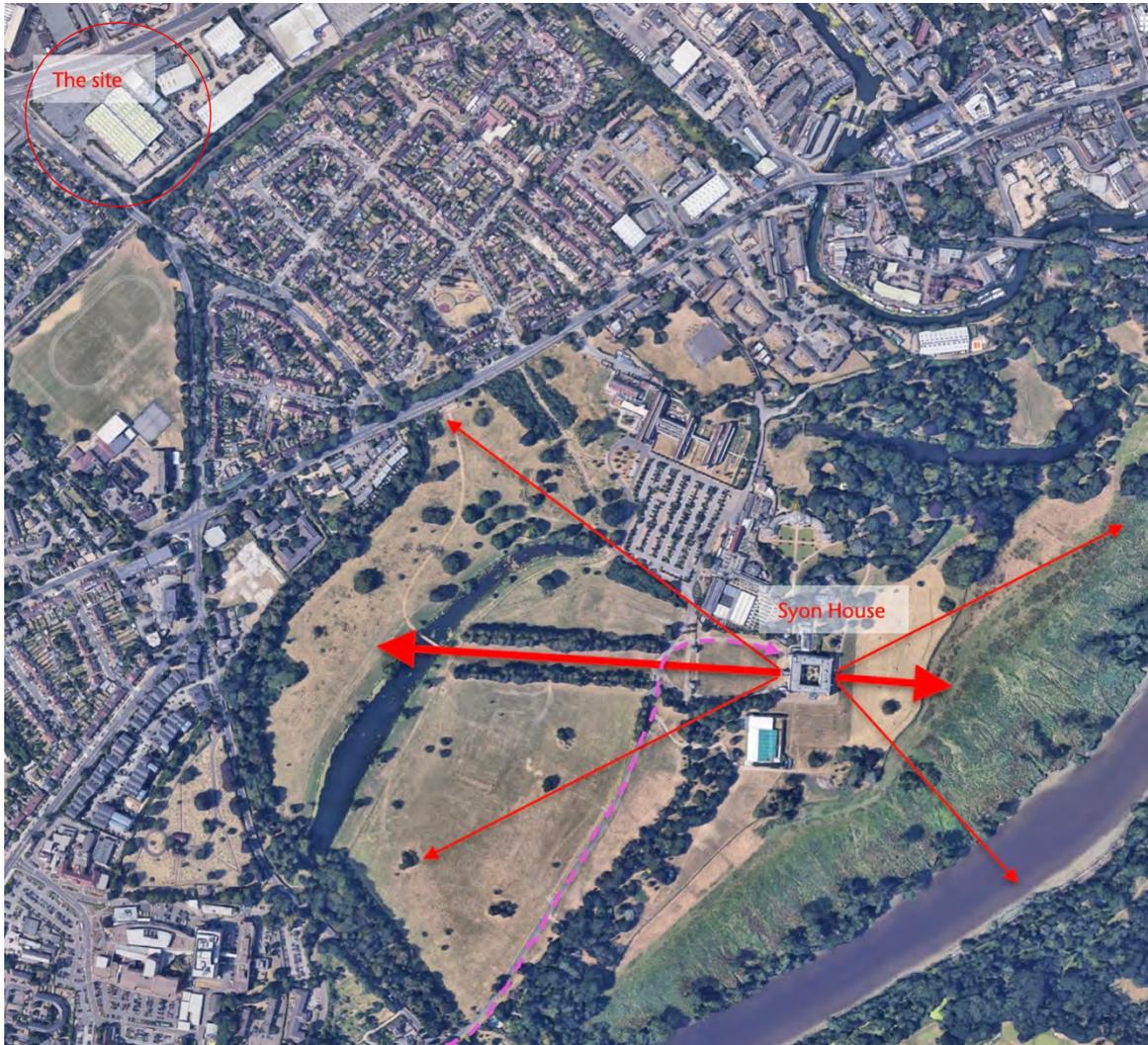


Figure 11: Syon House in relation to the site (top left). The principal axial views are represented by a thick red line, the extent of those views and the direction of peripheral views by a thin red line, and the 20th century access route is indicated by a dotted purple line

Osterley Park

3.37 Osterley House is listed Grade I and the list description is as follows:

1. 4419 JERSEY ROAD, ISLEWORTH

Osterley House TQ 1478 25/345 TQ 1477 27/345

I GV

2. Circa 1577 for Sir Thomas Gresham, remodelled by Robert Adam 1761-5. Interior - a few rooms retain early Georgian features, rest redecorated 1765-77. Country Life LX pp782, 818, 858 and LXXXVI p8.

Osterley House, the Stables, the Temple, and the Aviary form a group, with the "Roman Bridge" which is in the grounds to the north in the borough of Ealing.

Listing NGR: TQ1450478004

- 3.38 The other listed structures of the estate are mostly situated to the north of the house. They are: Osterley House Stables (Grade I), the Aviary or Little Orangery (Grade I), the Temple (Grade I), the Roman Bridge (Grade II*), Osterley Park Farmhouse and Walls (Grade II), Lake bridge to the south of the house (Grade II), and the Entrance Lodges and Gate Piers (Grade II).
- 3.39 The M4 motorway, built in 1974, more or less divides Osterley Park in half.
- 3.40 The list description for the Grade II* registered landscape describes in overall terms the 'C18 landscape park and pleasure grounds laid out on the site of an earlier formal garden, with substantial additional tree planting being undertaken in the C19 and C20'. The 18th century landscaping is attributed to Mrs Robert Child, sister-in-law of Robert Adam's client Sir Francis Child, and her steward, Mr Bunce
- 3.41 It continues:

Osterley Park is situated c 14.5km to the west of Hyde Park (qv), c 5km to the north of Hounslow, 4km to the west of Gunnersbury Park (qv), c 2.5km to the north of Syon Park (qv), and c 8km north-east of Heathrow Airport. Osterley Park is bounded to the east by Windmill Lane (B464). Jersey Road, including the gardens to the rear of houses on this road, forms the boundary to the south. Agricultural land and playing fields define the boundary to the west, and Tentlow Lane (A4127) the

north-west boundary. The c 217ha site is largely level with a very slight slope from the north-east down to the south-west. It is dominated by three pieces of water: the Garden Lake (c 2ha), the Middle Lake (c 5.5ha), and the North Lake (c 3ha). The M4 motorway cuts across the northern part of the site....

Osterley Park is approached from Jersey Road to the south. The entrance, guarded by the late C19 lodge to the west, leads onto the tree-lined South Avenue. The drive passes after c 300m a mid C20 estate building to the east, then continues for a further c 300m to the visitors' car park (situated to the east of the drive), before swinging around to the south-west between Garden (southern) Lake and Middle Lake. It then follows the north bank of Garden Lake for c 100m before turning to the north-west, terminating after c 50m in the forecourt to the east of the mansion. The South Avenue was constructed in response to the arrival in 1883 of the railway at the Osterley Park and Spring Grove Station, c 1km to the south-west of the mansion.

- 3.42 The proposed development site is almost exactly 2 km east-south-east (to the centre of the site) from the north east-facing entrance to Osterley House.
- 3.43 The heritage significance of Osterley House and its landscape can be summarised as follows:
- It is, like Syon House, an example of the country house typology where an essentially 18th century house was adapted from an earlier structure . It shares the same architect with Syon (Robert Adam). It is also of very high internal and external architectural interest for these reasons;
 - It also possesses a series of ancillary structures that have their own architectural interest in varying degrees;

- In addition to its designer, the site has various historical associations;
 - The built structures sit in a designed landscape, though, unlike Syon House, it is not associated with a noted designer but, like Syon contains various other phases of development.
- 3.44 As with Syon House, the proposed development will have no *direct* effect on this significance; it will affect the setting of the various assets that make up the Osterley site. That effect is examined in Section 5 of this report, but, again, it is possible to identify that the effect will be confined to one aspect of the significance of the site – that upon the sense of openness that is experienced in the landscape around Osterley House. This, in turn, is a function of the design of that landscape.
- 3.45 Osterley is organised on an south west to north east axis, with the principal entrance facing north east. Unlike Syon, Osterley does not have a singular design feature – such as an avenue of trees - that directs the view, but instead the arrangement of trees in the park, planted at various times, creates principal vistas in relation to the house, as illustrated in Figure 11.
- 3.46 The comments concerning the significance of the informal, pastoral aspects of the Syon landscape also apply to Osterley.



Figure 12: Osterley House in relation to the site (top left). The principal axial views are represented by a thick red line, the extent of those views and the direction of peripheral views by a thin red line, and the 1883 access route is indicated by a dotted purple line

Conclusion

- 3.47 Neither Syon House or Osterley House are, in fact, country houses in the strict sense of that term any more nor have they been for some time, though (as we acknowledge earlier) that is certainly their underlying typology. London has expanded to encircle the sites and to penetrate within them – the hotel, garden centre and car parking in the case of Syon and the M4 in the case of Osterley. Suburban London now extends far beyond what were once truly ‘country’ estates.
- 3.48 In both cases, the house and the designed landscape are integrated in a way that creates a hierarchy of significance and views. The design and orientation of both great houses creates defined axial vistas which represent the

most important views. In both cases the defined axes are not oriented towards the site. In both cases, when the most important viewing position at the principal entrance to the house is taken up, the site is screened by mature trees. In the case of Osterley, this is total – no view is possible (to the right of the main vista towards the Middle Lake) towards the site from the north east-facing steps of the Adam House. In the case of Syon, the site is located on the far right edge of the available view from the entrance to the house, obscured by trees and intervening buildings. In other words, the relationship of the site to the most important views in both instances is peripheral. Other views outward from both parks are inherently less significant than the principal axial views. Incidental views obtained when moving around the landscapes are important, but less so than the main views to and from the houses in the manner intended by both architect and landscape designer.

- 3.49 In the case of both sites, the city - suburban housing, the Gillette tower and substantial modern buildings of significant scale - is perceptible beyond the boundary of the site. Indeed, the Osterley Park Conservation Area Appraisal explicitly acknowledges the inter-relationship of the former country houses and their suburban context. Both the Osterley Park and Isleworth Riverside Conservation Areas extend to include significant areas of city beyond the edges of the registered landscapes, and both conservation area appraisals acknowledge the visibility of that city.
- 3.50 A key point to be made regarding the significance of the site in those circumstances is that it is robust. The heritage significance of both Syon Park and Osterley Park may derive in part from their country house typologies but that significance clearly does not rely on the horizon when viewed from within those sites being empty of development. The tower of the Grade II Gillette building supports this point; were the significance of the parks so sensitive to change, that tower should not be present.

Syon House lies 8 km from the eastern end of the Heathrow runways, and is directly beneath the flight path. Osterley Park is slightly north of the flight path but closer to Heathrow.

Boston Manor

3.51 Boston Manor Park lies to the north of the River Brent/Grand Union Canal, and is bisected by the final part of the elevated section of the M4 as it leaves London. It is not a registered landscape. The site contains three listed structures : Boston Manor House itself (Grade I), the stables (Grade II) and a Grade II garden wall and pair of gateposts. Boston Manor House is approximately 1.1 km from the site.

3.52 The list description for Boston Manor House is as follows:

1. *BOSTON MANOR ROAD, BRENTFORD 4419 Boston Manor House, Boston Manor Park TQ 1678 17/250 11.7.51.*

I

2. *1622-3. C18 North wing. 3-storeys and attics. Red brick. 6 windows in stone architraves. Stone cornice between 2nd and 3rd storeys. Stone porch with balustrade like that at Lilford Hall. Northants (1635). Interior has splendid early C17 ceilings, fine C18 wallpaper on upper staircase. Fine carved main staircase.*

Drawing room ceiling divided by moulded ribs into oblong and square panels, broken into semi-circular and segmental cusplings, connected by short corss- ribs. Within some of the panels are strap-work cartouches containing emblamatic figures; including the 4 elements designed by the C17 Dutch artist Mare Gheercerts, and engraved by Galle. The house was damaged in the war and was extensively restored prior to its reopening in 1963. Is now occupied by National Institute for Housecraft Limited. See 'Country Life' March 18 1965. AM.

Listing NGR: TQ1683978339

- 3.53 The present park is owned by the London Borough of Hounslow, having been sold to Brentford Urban District Council in 1923. It formed part of a larger and older park associated with the 17th century house.
- 3.54 Apart from the area around the house and two large open areas to the south of the M4, the park is wooded. It contains tennis courts and a bowling green.

The Royal Botanic Gardens World Heritage Site

- 3.55 A World Heritage Site is one which possesses 'Outstanding universal value', defined in the NPPF (and by UNESCO) as 'cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations'. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site.
- 3.56 The draft Royal Botanic Gardens Kew World Heritage Site Management Plan 2019-2025 contains a Statement of Outstanding Universal Value', which says:

Specifically, the site was inscribed under three UNESCO criteria for World Heritage Sites, which are:

Criterion (ii): Since the 18th century, the Botanic Gardens of Kew have been closely associated with scientific and economic exchanges established throughout the world in the field of botany, and this is reflected in the richness of its collections. The landscape and architectural features of the Gardens reflect considerable artistic influences both with regard to the European continent and to more distant regions;

Criterion (iii): Kew Gardens have largely contributed to advances in many scientific disciplines, particularly botany and ecology;

Criterion (iv): The landscape gardens and the edifices created by celebrated artists such as Charles Bridgeman, William Kent, Lancelot 'Capability' Brown and William Chambers reflect the beginning of movements which were to have international influence.

- 3.57 The Royal Botanic Gardens occupies a large site bordering the Thames, and is also a Grade I registered landscape. Figure 13 shows the relationship of the site to the World Heritage Site.



Figure 13: the relationship of the site to the Royal Botanic Gardens World Heritage Site

4 The legislative, policy and guidance context

Introduction

- 4.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.
- 4.2 Section 6 demonstrates how the proposed development complies with statute, policy and guidance. Not all the guidance set out in this section is analysed in this manner in Section 6: some of the guidance set out below has served as a means of analysing or assessing the existing site and its surrounding, and in reaching conclusions about the effect of the proposed development.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 4.3 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66(1) of the Act requires decision makers to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.

Case law

Assessing levels of harm

- 4.4 Of relevance to this matter is a judgement in the case of *Palmer v Herefordshire Council & Anr [2016]* (04 November 2016). The case concerned the effect of development on the setting of a designated heritage asset, a Grade II listed

building. This judgement is referred to in a recent appeal decision concerning development at 43/45 Notting Hill Gate, 39/41 Notting Hill Gate and 161-237 Kensington Church Street (odd), London W11 3LQ, involving a tall building that would affect the setting of various designated heritage assets¹⁸

- 4.5 The clear message from the Court of Appeal judgement and the appeal decision is existing harm to heritage significance should be considered alongside the effect of the proposed development, as part of a holistic assessment that takes account of the existing circumstances of the heritage asset affected – and the effect of those circumstances on heritage significance – when considering the net level of harm caused by the proposed development.

*Substantial harm*¹⁹

- 4.6 Another significant case, also referred to in an appeal decision, is *Bedford BC v SoS for Communities and Local Government [2013] EWHC 2847 (Admin)*. It played an important part in the Inspector's judgement as to substantial harm in his report to the Secretary of State for Housing, Communities and Local Government concerning development affecting land at Chiswick Roundabout, Junction of Gunnersbury Avenue and Great West Road, London W4²⁰.
- 4.7 The Inspector notes that the Judge in *Bedford* (our emphasis):

...set out his understanding of what the Inspector had been looking for when applying a test of 'something

¹⁸ APP/K5600/W/16/3149585, decision dated 12 June 2017

¹⁹ In order for 'substantial' or 'less than substantial harm' as defined in the NPPF to be caused, both levels of harm must be caused to a designated heritage asset. Harm to non-designated heritage assets is not allocated a level.

²⁰ Appeal refs APP/F5540/W/17/3180962 & APP/F5540/Z/17/3173208. The Inspector's Report to the Secretary of State for Housing, Communities and Local Government was dated 10 December 2018. The development is known as the 'Chiswick Curve'.

*approaching demolition or destruction'. The judge was not giving his own view of what 'substantial harm' meant: "Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was **either vitiated altogether or very much reduced**".*

The National Planning Policy Framework

- 4.8 The Government published a further revised version of the National Planning Policy Framework (NPPF) on 19 February 2019, following its first revision on 24 July 2018.

Design

- 4.9 Chapter 12 of the National Planning Policy Framework deals with design: Achieving well-designed places. It begins:

'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process'.

- 4.10 Paragraph 127 sets out a series of expectations regarding design quality:

Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the

area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

- 4.11 Paragraph 131 says that ‘In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings’.

Proposals affecting heritage assets

- 4.12 Chapter 16 of the National Planning Policy Framework: ‘Conserving and enhancing the historic environment’ deals with Heritage Assets describing them as ‘an irreplaceable resource’ that ‘should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations’.²¹
- 4.13 Paragraph 189 brings the NPPF in line with statute and case law on listed buildings and conservation areas. It says that:

‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’

- 4.14 In terms of the local authority, paragraph 190 requires that they ‘identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.’
- 4.15 Paragraph 192 says that:

In determining applications, local planning authorities should take account of:

²¹ The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

4.16 Paragraph 193 advises local planning authorities that ‘When considering the impact of a proposed application on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

4.17 Paragraph 195 says:

Where a proposed application will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and*
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*

- *the harm or loss is outweighed by the benefit of bringing the site back into use.*

- 4.18 Paragraph 196 says that ‘where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’ (paragraph 196).
- 4.19 In taking into account the effect of an application on the significance of a non-designated heritage asset the local authority should employ a ‘a balanced judgement’ in regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 197).
- 4.20 The NPPF introduces the requirement that ‘Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred (paragraph 198).
- 4.21 Where a heritage asset is to be lost, the developer will be required to ‘record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible’ (paragraph 199).²²
- 4.22 In terms of enhancing the setting of heritage assets the NPPF states that ‘local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably’. (paragraph 200).
- 4.23 It goes on however that ‘Loss of a building (or other element) which makes a positive contribution to the

²² Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole' (paragraph 201).

- 4.24 Finally, paragraph 202 requires that the onus will be on local planning authorities to 'assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies'.

Planning Practice Guidance

- 4.25 Planning Practice Guidance provides streamlined guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the section entitled 'Conserving and Enhancing the Historic Environment'. It is subdivided into sections giving specific advice in the following areas:

- Historic Environment Policy and Legislation;
- Heritage in Local Plans;
- Decision-taking: Historic Environment;
- Designated Heritage Assets;
- Non-Designated Assets;
- Heritage Consent Processes; and
- Consultation Requirements

- 4.26 The Government published an updated Historic Environment section of PPG on 23 July to reflect the

changes made to the National Planning Policy Framework (NPPF) since the 2012 edition.

Historic England’s Good Practice Advice in Planning Notes (GPAs)

- 4.27 Historic England provide guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. They provide ‘information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the national Planning Practice Guide (PPG)’.
- 4.28 These notes are:
- GPA 1: The Historic Environment in Local Plans (2015);
 - GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015);
 - GPA 3: The Setting of Heritage Assets (2nd ed., 2017).
- 4.29 This last piece of guidance is addressed separately below.
- 4.30 Historic England’s ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ is referred to in the previous section of this report.
- 4.31 Historic England also publishes Advice Notes (HEANs), and these are discussed below.

Historic England guidance on the setting of heritage assets (GPA 3)

- 4.32 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. The document provides ‘information on good practice to assist local

authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG)'.

- 4.33 The guidance echoes the definition of 'setting' in the NPPF as 'the surroundings in which [the asset] is experienced' and continues: 'its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.
- 4.34 The guidance provides, at Paragraph 12, a step-by-step methodology for identifying setting, its contribution to the significance of a heritage asset, and the assessment of the effect of proposed development on that significance:
- Step 1: identify which heritage assets and their settings are affected;
 - Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
 - Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
 - Step 4: explore the way to maximise enhancement and avoid or minimise harm;
 - Step 5: make and document the decision and monitor outcomes.
- 4.35 The document then sets out how the step-by-step methodology is used and considers each step in more detail.

Historic England tall building guidance (HEAN 4)

4.36 Historic England Advice Note 4 ‘Tall Buildings’ replaces the previous English Heritage/CABE ‘Guidance on Tall Buildings’, while echoing much of the advice contained in that document. It advises applicants to ‘identify the zones of visual influence of a proposal’; ‘guide and improve design’, making use of Design Review; ‘understand what illustrative material is likely to be needed’. It sets out a checklist ‘when preparing an application’:

a. Design and Access Statement

b. Heritage assessment

c. Assessment of context (local and town- or city-wide)

d. Assessment of cumulative impacts

e. Environmental Impact Assessment

f. Satisfaction of the following design criteria:

- *Architectural quality*
- *Sustainable design and construction*
- *Credibility of the design*
- *Contribution to public space and facilities*
- *Consideration of the impact on the local environment (and particularly at ground level)*
- *Provision of a well-designed inclusive environment*

4.37 The Advice Note says that a high quality scheme ‘will have a positive relationship’ with:

a. Topography

b. Character of place

c. Heritage assets and their settings

d. Height and scale of development (immediate, intermediate and town- or city-wide)

e. Urban grain and streetscape

f. Open spaces

g. Rivers and waterways

h. Important views including prospects and panoramas

i. The impact on the skyline

4.38 The Advice Note continues: 'A successful application will have fully addressed a range of design criteria. Delivering architectural quality involves a consideration, amongst other things, of the building's:

a. Scale

b. Form and massing

c. Proportion and silhouette

d. Facing materials

e. Detailed surface design

f. Relationship to other structures

g. Impact on streetscape and near views

h. Impact on cityscape and distant views

i. Impact on the skyline

London Plan: Intend to Publish London Plan 2019 ²³

4.39 A draft new London Plan was published by the Mayor for consultation in December 2017. The Examination in Public was held between 15th January and 22nd May

²³ Mayor of London (2019) London Plan: Intend to Publish London Plan 2019, December 2019.

2019 and the Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019. The Mayor published the 'Intend to publish' version of the new London Plan on 9th December 2019. The timetable for implementation is now to lay the plan before the London Assembly on 6 February 2020 and publish the final London Plan in March 2020. The current London Plan (2016) is still the adopted development Plan, but the new London Plan is a material consideration in planning decisions.

- 4.40 Chapter 7 'Heritage and Culture' of the 'intend to publish' version of the new London Plan expands upon the policies of the 2016 plan. It defines 'Heritage significance' (para 7.1.7) as:

'the archaeological, architectural, artistic or historic interest of a heritage asset. This may can be represented in many ways, in an asset's visual attributes, such as - form, scale, materials, and architectural detail, design and setting, as well as through historic associations between people and a place, and, where relevant, the historic relationships between heritage assets.'

- 4.41 Policy HC1 'Heritage Conservation and Growth' says that

'development that affects the settings of heritage assets and their settings should respond positively to the assets' significance, local context and character, and to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form.'

- 4.42 Policy HC2 'World Heritage Sites' advises that

'development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value'.

- 4.43 Policy HC3 ‘Strategic and Local Views’ and Policy HC4 ‘London View Management Framework’ describe how The Mayor has designated a list of Strategic Views that will be kept under review and requires that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

Hounslow Local Plan

- 4.44 The Hounslow Local Plan was adopted on 15th September 2015 by Hounslow Borough Council. Until 2030, it will form part of the planning framework of the borough.
- 4.45 Policy CC4 ‘Heritage’ states that the Council:
- ‘Will identify, conserve and take opportunities to enhance the significance of the borough’s heritage assets as a positive means of supporting an area’s distinctive character and sense of history.’*
- 4.46 Actions to be taken by the council to fulfil these aims include: collating a borough-wide Heritage Strategy in order to formulate long-term conservation and enhancement of the borough’s network of designated and non-designated heritage assets and their settings, identifying new assets where appropriate and promoting heritage-led regeneration, particularly where this brings long term value and sense of place to development, such as in town centres and along the Golden Mile.
- 4.47 The council will expect development proposals to²⁴:
- (i) Conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance;*
- (j) Retain, conserve and reuse a heritage asset in a manner appropriate to its value and significance;*

²⁴ Relevant parts quoted

(k) Demonstrate that substantial harm to or loss of a heritage asset is avoided, unless exceptional circumstances can be demonstrated, consistent with the NPPF;

(l) Demonstrate that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (see Glossary), this harm will be outweighed by the public benefits of the proposal, including securing its optimum viable use; or

(m) Have regard to any harm to, or loss of, the significance of a non-designated heritage asset, including from both direct and indirect effects. Non-designated heritage assets include locally listed buildings, Archaeological Priority Areas and areas of special local character;

....

(o) Any development within or affecting a Conservation Area must conserve and take opportunities to enhance the character of the area, and respect the grain, scale, form, proportions and materials of the surrounding area and existing architecture;

....

(q) Conserve and enhance the internationally recognised Outstanding Universal Value of the Royal Botanic Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from the site;

....

(v) Conserve and enhance any strategic or local views identified in the Urban Context and Character Study and undertake a visual impact assessment to demonstrate no adverse impacts on the designated view or on views from Royal Botanic Gardens Kew World Heritage Site.

Great West Corridor Local Plan Review

- 4.48 The Council have prepared a Local Plan review (October 2017) for the Great West Corridor which is intended to will transform the Opportunity Area and deliver much needed jobs and homes. A further Local Plan Review document was issued in July 2019. These plans set out the Council's vision and opportunities for good growth over the next 15 years. The ambition is to adopt the plan by mid-late 2020.
- 4.49 The Local Plan review for the Great West Corridor deals with 'Design and Heritage' at GWC5. It reiterates the Heritage policies of the current Local Plan in the context of the unique environment of the Great West Road recognising in Strategic Objective 12: the need
- 4.50 To protect and make the most of our unique heritage and historic environment, while encouraging innovations in building technology and improving sense of place.

5 The proposed development and its effect

Introduction

- 5.1 This section of the report assesses the proposed development and its effect on the heritage significance described earlier in this report. The proposed development is described in the drawings and Design & Access Statement prepared by Patel Taylor Architects, the Planning Statement, the Townscape And Visual Impact Assessment and other application documents. The townscape views within the Townscape And Visual Impact Assessment have been used to assess the effect of the proposed development on the setting of heritage assets.

The proposed development and its effect

- 5.2 The site exists at an important junction on the Great West Road (the A4) and by responding to the size and presence of the Gillette Building, will both help to mark that corner and emphasise the significance of the Gillette Building's location. In addition, the site is immediately adjacent to Syon Lane railway station, an important public transport node. The A4 has been and continues to be major arterial route to the west of London, and the north-south orientation of Syon Lane creates a notable crossing point. It is appropriate, therefore, that the site is developed to reflect the significance of the location
- 5.3 The site itself, notwithstanding the tower or mast of the Homebase building, does not do this. Regardless of what architectural merit the building itself may or may not have, the existing Homebase site fundamentally fails in urban terms by the creation of negative space – as pointed out earlier, it is, essentially, a shed in the middle of a car park, an object building surrounded by ill-considered vacant space. Its occupation of its site reinforces the 'subtopian' character of this part of the Great Western Road and underlines the placeless quality

of the built environment in the area. It should be noted that the older buildings – Gillette, the National Westminster Bank, the former Firestone building, etc. – engaged with their surroundings in a deliberate, architectural fashion, whereas Homebase and other recent buildings seem to ignore their context.

- 5.4 The proposed scheme thus has the capacity to foster a process of place-making that helps to create a more favourable and respectful context for the heritage assets in the vicinity of the site. This can be achieved by the better occupation of the site – both physically and in terms of use – and creating a landmark that assist in locating the site. This is an appropriate location for a development incorporating buildings of significant scale.
- 5.5 That is what the proposed development does. It builds to the edges of the site, creating a defined street edge with active frontages. This creates a podium containing the relocated Tesco store, from which residential buildings rise to various heights. The spaces between these buildings will be landscaped amenity space for residents.
- 5.6 The massing of the development cause the height of the scheme to step up and away from Syon Lane. The podium is four storeys high. The edge of the scheme on Syon Lane alternates from six storeys at the junction with the A4, through two seven storey buildings to a ten storey building adjacent to the railway line. The tallest part of the development would be seventeen storeys high, at the north-eastern corner of the site. Along the eastern edge of the site are two further residential buildings, both fifteen storeys.
- 5.7 The design of the scheme draws its inspiration, appropriately, from the Art Deco character of the older buildings in the vicinity and applies this aesthetic to modulating the massing described above. The streamlined appearance, the grouping of storeys separated by banding, the curve in the corner block at the Syon Lane/A4 junction, the stepping of this block – the design incorporates these and other means of breaking

down the overall massing of the scheme while still creating a landmark development with a suitable presence for this key location.

- 5.8 The effect of the height and the visibility of the proposed scheme on the setting of heritage assets has been carefully tested by means of visualisation of the scheme from a wide range of view points, including from within Osterley Park and Syon Park. This, in turn, has permitted the modulation of height on the site so as to reduce its effect on heritage assets while maximising the potential of the site.
- 5.9 The scale of the proposed development is clearly greater than the listed buildings in the vicinity, but their special interest does rely on a specific scale on the site, and their visibility along the A4 remains largely unimpeded. The location of the tallest parts of the development away from the Syon Lane/A4 junction sets that height away from the Gillette tower. The backdrop of the former Coty building (now Syon Clinic) will clearly be affected, but not so as to cause it a significant degree of harm.
- 5.10 It is very clear that, when the heritage significance of the registered landscapes and their buildings (and the relationship of buildings and landscape) is considered properly, the proposed development will not harm that significance. The analysis provided earlier shows that the proposed development would not appear in the principal designed views from either landscape and not be visible at all from Osterley House itself. From Syon House, the development would just appear, with the redevelopment of the Tesco site, at the far right of the view from the west-facing entrance to Syon House, largely obscured by trees and the Grade II Former Riding School. The Great Lime Avenue is, logically and experientially, the most important view on the western side of Syon Park. The presence of the development within other views in the park is of inherently less significance, even where it is seen in the backdrop of other listed structures.

- 5.11 It is important to state clearly that the heritage significance of both Osterley and Syon does not rely on an on empty skyline. That idea is not supported by the existing reality of the setting of these places or emerging policy. In the case of Syon, it is also important to note that – in an accurate assessment of heritage significance - the tower of the Gillette building, notwithstanding that it is a Grade II listed building, is not directly related to the significance of Syon Park or its buildings. As pointed out earlier, if it is thought that the Syon skyline should largely be free of modern development, then the 20th century incursion of the Gillette tower should not be present, nor any other modern development that can, at present, be seen from Syon Park.
- 5.12 Historic England, in its consultation response, refers to a 1749 Canaletto painting of Syon House from the south east, on the eastern tow path of the Thames. The view in the painting is, as acknowledged by Historic England, very approximate and is also distorted in terms of distance and perspective, and positions the viewer much closer to the building than is physically possible. Figure 14 shows the painting and the proposed view with both the Tesco and Syon Gardens schemes, and demonstrates that both would be obscured by either Syon House itself or the mature tree cover, with only a glimpsed view of the proposed developments.



Figure 14: the 1749 painting of Syon House by Canaletto, and the view with both Tesco and Syon Gardens schemes in wire line.

5.13 The proposed development would change the setting of heritage assets in the surroundings of the site by virtue of

its visibility and presence. That visibility is not, by itself, harmful, and indeed it has been assessed as, on balance, beneficial for specific townscape reasons concerning the nature of location and the potential for the site to contribute to placemaking and way-finding. The heritage significance of each of the heritage assets assessed does not inherently rely on no change occurring in their setting, nor is it necessarily harmed by the presence of new development in their setting that is highly visible. Quite the opposite; the visibility of new development is frequently a highly positive quality, signalling regeneration and assisting in place-making. That will be the case in this instance.

Conclusion

- 5.14 The proposed scheme has the capacity to begin a process of place-making that helps to create a more favourable context for the heritage assets in the vicinity of the site. The site exists at an important junction on the Great West Road and by responding to the size and presence of the Gillette Building, will both help (in conjunction with the Osterley Gate scheme) to mark that corner and emphasise the significance of the Gillette building's location. The scale of the proposed development is clearly greater than the listed buildings in the vicinity, but the special interest of these designated heritage assets does not rely on a specific scale on the site, and their visibility along the A4 remains largely unimpeded. There will be a minimal effect on the setting of heritage assets further afield, such as the Osterley Park Conservation Area, Syon Park, Osterley Park and Boston Manor, and no effect on the Kew World Heritage Site. The proposed scheme will, on balance, preserve the setting of heritage assets and not cause harm to their heritage significance, and will bring significant public benefits.
- 5.15 In summary, therefore:

- The site at present detracts from the setting of heritage assets in its immediate vicinity on the Great Western Road.
- The effect of the height and the visibility of the proposed scheme on the setting of heritage assets has been carefully tested by means of visualisation of the scheme from a wide range of view points, including from within Osterley Park and Syon Park.
- The development will step up from the Syon Lane to greater height on the eastern boundary of the site. The massing and height of proposed buildings in the backdrop of the Gillette tower has been adjusted to preserve its pre-eminence in views from the area around the site.
- The heritage significance of the registered landscapes and their buildings (and the relationship of buildings and landscape) will not be harmed by the proposed development.
- The proposed development would not appear in the principal designed views from either landscape and not be visible at all from Osterley House itself.
- In any event, the heritage significance of both Osterley and Syon does not rely on an on empty skyline, as is demonstrated by the presence of the Gillette tower and other modern development. The significance of their constituent heritage assets remains wholly intact with these developments visible in their settings.
- The proposed development would change the setting of heritage assets in the surroundings of the site by virtue of its visibility and presence. Visibility does not equate to harm. Its visibility will be beneficial for specific townscape reasons and the potential for the site to contribute to placemaking and way-finding.

Pre-application advice

5.16 Comments have been received from the Council and Historic England in response to pre-application presentations of the proposed development. These have been addressed in this report, and are summarised as follows.

- We believe that our assessment of the significance of heritage assets, including the registered landscapes, is sufficient, valid and robust. We do not disagree with either the Council or Historic England that the whole of the two registered landscapes possess heritage significance, but we maintain that, as in any heritage asset, that significance varies and a hierarchy of significance within an overall measure of significance can be assessed.
- There is no dispute that the pastoral element of both registered landscapes is of significance. However that significance is not the same in design or experiential terms as the more formal and geometric aspects of their design. Kinetic views obtained by self-positioning in the park are, undoubtedly, important but cannot logically have the same importance as the views created by the formal structuring aspects of the overall landscape design, intended by the designer to cause the user of the landscape to experience it in a certain way.
- We continue to maintain that the present reality of the context of the registered landscapes is an unavoidable factor in assessing their significance. They do not continue in an original, unaltered rural setting, nor are the registered landscapes and their buildings themselves unaltered.
- Historic England's 'Register of Parks and Gardens Selection Guide for Rural Landscapes', quoted by Historic England, describes original conditions and

the design intentions of those responsible for the creation of the landscapes. The degree to which a development affects an original condition where it no longer exists cannot be a reasonable method of assessment.

- Notwithstanding the aspirations of the Syon Estate's Heritage Landscape Management Plan and the Thames Landscape Strategy, we are not aware of any actual proposals to reducing or removing tree cover on the Syon Estate or any formal planning policy or objective that seeks to do so. This consideration should not therefore be given weight in assessing the proposed development.
- Both the Council and Historic England have identified the potential for less than substantial harm to be caused by the proposed development to designated heritage assets. This is addressed in the next section of the report. However, we maintain strongly that the concept of visibility equating automatically to harm has no basis in legislation, policy or guidance.

6 Compliance with legislation, policy and guidance

Introduction

- 6.1 This report has provided, in Sections 2 and 3, a detailed description and analysis of the significance of the Tesco site, Osterley and its heritage context, as required by the National Planning Policy Framework. In addition, the report also describes (in Section 5, 'The proposed development and its effect') how the proposed scheme will affect that heritage significance. The effect is positive, and for that reason, the scheme complies with policy and guidance. This section should be read with Section 5.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 6.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed scheme for Tesco site, Osterley preserves the setting of listed buildings, the character and appearance of the nearby conservation areas and the setting of the registered landscapes. The proposed scheme thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It does not lead to 'substantial' harm or any level of 'less than substantial' harm to any heritage assets.

The NPPF: the level and nature of 'harm' caused by the proposed development

- 6.3 Having concluded that the proposed development will preserve and enhance the relevant designated heritage assets, we now consider whether harm – in the sense used by the National Planning Policy Framework – is caused to these heritage assets.

The level of 'harm' caused by the proposed scheme

- 6.4 As outlined in Section 4, the NPPF identifies two levels of potential 'harm' that might be caused to a heritage asset by a development: 'substantial harm...or total loss of significance' or 'less than substantial'. To be susceptible to a specific level of harm, harm must be caused to a *designated* heritage asset – in this case, the listed buildings, conservation areas and registered landscapes in question (as identified in Section 3).
- 6.5 The site *itself*, given its nature and condition and notwithstanding that it is close to designated heritage assets, does not contribute to the special interest of any of those assets. Visibility of the proposed development in the setting of the listed structures does not equate to harm.
- 6.6 The setting of heritage assets can be a component of special architectural or historic interest or heritage significance, and thus development in that setting has the potential to harm these qualities. The degree to which the setting of the relevant heritage assets contributes to their special interest or significance is considered in Section 3.
- 6.7 However, it must be repeated that nowhere in legislation, policy and guidance relating to the historic built environment is it set down that a change in setting *per se* is a reason to conclude that harm is *inevitable*. The visibility of a development in the setting of a heritage assets does not automatically equate to harm, assuming that a rational, relevant and realistic analysis of setting is accepted. The fact that a development may be highly visible in the setting of a heritage asset may cause someone forming an opinion to consider that harm is caused; it cannot, in any admissible way, be considered to *definitively* do so. Such an opinion can only remain just that, and an opinion reliant to a considerable degree on a subjective and personal response.

Substantial harm

- 6.8 The proposed Syon Gardens development cannot be reasonably or legally described as causing ‘substantial’ harm. The only potential for ‘substantial’ harm would be if the proposed development of the site caused the loss of a significant component of the special interest of the relevant designated heritage assets. As has been explained earlier, the proposal very evidently does not result in the ‘total loss of significance’ of any designated asset and the special interest of listed buildings, conservation areas and registered landscapes is neither ‘vitiating altogether or very much reduced’ as per *Bedford*. A notable or large change to a designated heritage asset (or its setting) does not automatically or inevitably result in substantial harm – or, indeed, in less than substantial harm.

Less than substantial harm

- 6.9 Our analysis of the proposed development is contained in the previous section of this report. It assesses the effects of the proposed development in the context of legislation, policy and guidance and concludes that there would be no harm to the special interest or significance of the designated heritage assets. It assumes an acceptance of the fact that nothing in legislation, policy and guidance precludes the visibility of development in the setting of heritage assets. The development results in change, but that change, while perhaps displeasing to some, is not harmful simply because it alters the setting of heritage assets by being visible. This is the first key point.
- 6.10 The second key point is that made earlier, in Section 3, and refers to the case law discussed in Section 4: the *present* setting of the heritage assets within the immediate vicinity of the site already causes an existing level of less than substantial harm to their heritage significance.

If less than substantial harm is assessed

- 6.11 However, it is possible that a decision-maker may assess that the proposed development will cause some harm to the heritage significance of the relevant heritage assets.

- 6.12 If the Council decides that harm is caused to heritage significance, then that level of harm can only be a very low level of less than substantial harm. That harm is, in turn, more than balanced by a series of tangible public benefits that flow from the scheme. The public (economic, social, etc.) benefits are set out in detail in the planning statement.
- 6.13 Taking into account the existing circumstances and condition of the site, the proposed development will enhance the physical quality of the site over its present situation. It will deliver new homes, work space and other uses by means of a high quality and sensitive design, will assist in placemaking and way-finding and help to ensure the economic and future viability of the area. The proposed development will be an important part of deliver the objectives of the Great West Corridor Local Plan.

Specific requirements of the NPPF

- 6.14 The proposed scheme is, undoubtedly, a very good example of the ‘innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings’ that is sought by Paragraph 131 of the NPPF.
- 6.15 This report has provided a detailed description and analysis of the significance of the site and its heritage context, as required by Paragraph 189 of the National Planning Policy Framework.
- 6.16 The proposed scheme complies with Paragraph 193 and 194 of the NPPF in that it conserves the heritage assets whose setting it affects. For the reasons given earlier, we do not believe that the scheme involves any ‘less than substantial harm to the significance of a designated heritage asset’, but any such ‘less than substantial harm’ that *may* be ascribed to the scheme is greatly outweighed by the benefits generated by the scheme, satisfying Paragraph 196.

- 6.17 The proposed development certainly enhances the setting of heritage assets over their present circumstances, as required by Paragraph 200 of the NPPF.
- 6.18 The scheme very definitely strikes the balance suggested by the NPPF – it intervenes in the heritage context of the site in a manner commensurate to its heritage significance. This balance of intervention versus significance is described in detail earlier.

London Plan: Intend to Publish London Plan 2019

- 6.19 The proposed scheme is consistent with the current London Plan. The proposed scheme is of ‘the highest architectural quality’ and includes ‘details and materials that complement... the local architectural character’. The proposed scheme adds life and vitality to the setting of heritage assets around it - the ‘desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping’ has been taken into account. The scheme clearly ‘conserve[s the significance of heritage assets], by being sympathetic to their form, scale, materials and architectural detail’. For these reasons, the scheme is consistent with Policy 7.8 of the London Plan.
- 6.20 It is also consistent with Policy 7.9 of the Plan – the ‘significance’ of the heritage assets in its context has been ‘assessed’ and the scheme is ‘designed so that the heritage significance is recognised both in [its] own right and as [a] catalyst for regeneration’.
- 6.21 The proposed scheme will remain consistent with the replacement London Plan when it is formally adopted, and will fully comply with its design and heritage policies.

Hounslow Local Plan

- 6.22 For the same reasons, and in positively addressing the requirements of the National Planning Policy Framework, the proposed development also satisfies the policy requirements of the Hounslow Local Plan relevant to

heritage assets, in particular Policy CC4. The proposed development does 'conserve and take opportunities to enhance [the setting of heritage assets] in a manner appropriate to [their] significance.

- 6.23 In particular, and if the Council assesses that less than substantial harm is caused by the development to designated heritage assets, the proposed development will comply with part (l) of Policy CC4: any such harm 'will be outweighed by the public benefits of the proposal'.

Historic England guidance on the setting of heritage assets

- 6.24 The step-by-step methodology provided in Historic England's Historic Environment Good Practice Advice in Planning Note 3 is addressed as follows:

- *Step 1: identify which heritage assets and their settings are affected:*

This is done in Section 2 and 3 of this report.

- *Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s):*

This is discussed in Sections 2 and 3 of this report

- *Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance:*

This is undertaken in Section 5 of the report

- *Step 4: explore the way to maximise enhancement and avoid or minimise harm:*

This formed part of the design process and pre-application discussions with the local planning

authorities, and the design has evolved to respond to pre-application responses.

- *Step 5: make and document the decision and monitor outcomes:*

The submission documents, in particular the Design & Access Statement, and this report record the scheme as amended following design development prior to an application for planning permission being made.

Historic England tall building guidance

- 6.25 The planning application for the proposed development is accompanied by all the material identified in the checklist contained in *Historic England Historic England Advice Note 4: Tall Buildings*. No cumulative schemes have been identified as requiring assessment.
- 6.26 In terms of the satisfying the design criteria identified, the proposed development fully and successfully addresses each point. Terms such as ‘quality’ and ‘credibility’ are somewhat subjective, but the submission documents adequately demonstrate the high quality of the proposed scheme.
- 6.27 This is true of both the design of the new buildings and the accommodation they will provide. The careful scaling of the development, the breaking down of their overall mass, the considered relationship with the retained and surrounding buildings, the modelling of the lower and upper volumes, the use of materials, the creation of high quality new public realm – all aspects of the design have been developed and refined in consultation with the Council, Historic England and the GLA, and the quality of the design is evident.
- 6.28 The submission documents also show how the scheme will be eminently sustainable in design, construction and use. It will enable enhanced public space, thus helping to provide ‘a well-designed inclusive environment’.

6.29 The submission documents and this report show how the proposed development will have a 'positive relationship' with 'topography', 'character of place', and 'heritage assets and their settings'. Both set out the rationale for the 'height and scale of development (immediate, intermediate and town- or city-wide)' and how the development relates to the 'urban grain and streetscape', 'open spaces' and 'important views including prospects and panoramas. The impact of the proposed development on the skyline is clearly shown in the townscape views, and underpinned by an urban design rationale linked to an architectural response founded on a clear understanding of the significance of the location and in particular the significance of heritage assets. For these reasons, the scheme successfully addresses each of the criteria listed at Paragraph 4.8 of the Advice Note.

7 Summary and conclusions

- 7.1 This report has been prepared to support a planning application for proposals affecting the Homebase site, Syon Lane, Brentford, TW7 5QE. The report has been prepared for St Edward Homes Ltd, a joint venture between M&G Investment and Berkeley Group Limited.
- 7.2 The report describes the site and its surroundings as it is found at present. Section 2 sets out a brief history of the area. Section 3 identifies the heritage assets in the vicinity, and assesses heritage significance in detail. Section 4 sets out the legislation, policy and guidance relevant to the proposed scheme.
- 7.3 The proposed scheme and its effect on heritage significance is assessed in Sections 5, and pre-application comments regarding heritage matters are also addressed in this section.
- 7.4 The report concludes that the proposed scheme has the capacity to begin a process of place-making that helps to create a more favourable context for the heritage assets in the vicinity of the site. The scale of the proposed development is clearly greater than the listed buildings in the vicinity, but the special interest of these designated heritage assets does not rely on a specific scale on the site, and their visibility along the A4 remains largely unimpeded. There will be a minimal effect on the setting of heritage assets further afield, such as the Osterley Park Conservation Area, Syon Park, Osterley Park and Boston Manor, and no effect on the Kew World Heritage Site. The proposed scheme will, on balance, preserve the setting of heritage assets and not cause harm to their heritage significance, and will bring significant public benefits.
- 7.5 Section 6 demonstrates how the proposed development will comply with legislative, policy and guidance. We believe that the development will preserve the setting of designated heritage assets, and it therefore complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and

Conservation Areas) Act 1990. It also preserves the setting of non-designated heritage assets. The proposed scheme is consistent with the urban design and heritage policies of the National Planning Policy Framework, the London Plan and Hounslow's Local Plan.

Appendix A: History of the Great West Road

1. The Great West Road was built between in the 1920s as a bypass to relieve traffic congestion on the main roads through Chiswick, Brentford and Hounslow. Forming one stretch of the London section of the A4 road – formerly the main route from London to Bath and the west of England and historically known as the Bath Road – it was built in two phases. The first, in 1921 – 1924, was opened to traffic in May 1924, and the second – a section between South Ealing Road and Boston Road, which necessitated the demolition of a considerable amount of property, was completed in June 1926. The section running west from near to where the Chiswick Flyover (opened in 1959) begins, to its intersection with the ancient road of Syon Lane (B454), came to be known as the ‘Golden Mile’ because of the many modern and decorative Art Deco style factories that sprang up on either side of the busy dual carriageway. Following the construction of the Gillette Building in 1937 to designs by Sir Banister Fletcher, the junction of Syon Lane and the Great West Road acquired the name ‘Gillette Corner’. This effectively marked the western end of the ‘Golden Mile’ since the land beyond was owned by the Church Commissioners, thus preventing commercial and industrial development.²⁵ ‘Gillette Corner’ also marks the border between Brentford and Osterley. Together with Western Avenue, and the linking North Circular Road, it constituted, in the inter-war period ‘the single greatest concentration of industry in the country, running from Wembley through Park Royal south and west to Twickenham’.²⁶
2. Cutting mostly through rural farmland, the Great West Road had a profound impact on the development and character of Brentford and surrounding areas. Brentford emerged in the late 19th century from two neighbouring settlements, Old

²⁵ Wikipedia: [https://en.wikipedia.org/wiki/Golden_Mile_\(Brentford\)](https://en.wikipedia.org/wiki/Golden_Mile_(Brentford))

²⁶ Gavin Weightman, Stephen Humphries, Joanna Mack *The Making of Modern London* (2007), 136.

Brentford, in Ealing parish, and New Brentford, in Hanwell. Both had developed along a main road out of London, with New Brentford deriving its importance from a ford over the Thames and a crossing over the river Brent, and Old Brentford from its proximity to Kew Bridge. During the 19th century industry expanded along the Thames and the Grand Union Canal, connecting the two towns. Brentford was united under a local board of health in 1874 and from 1894 until 1927 lay within Brentford Urban District. By 1921 Brentford Urban District contained 3,261 dwellings, with most lying within the former boundaries of Old Brentford, which had seen systematic slum clearance and small brick terraces erected since the 1890s.²⁷

3. The building of the Great West Road, and the new factories it attracted, stimulated intensive residential development. As the road neared completion, some of the long-established landholding families sold up, enabling private developers to capitalise on the housing demand created by an influx of factory workers. Most of the area was built over, with middle-class districts emerging near Gunnersbury Park in the northeast and Boston Manor Park in the northwest; their respective manor houses were severed from the town by the Great West Road. Both expansive historic parks (Boston Manor park, 407 acres; Gunnersbury park 183 acres) however resisted developmental incursion, although Brentford U.D.C. had wanted to build on Gunnersbury park, and in 1924 purchased Boston Manor House and 40 acres of parkland.²⁸ Instead, in 1928-9, it erected 118 houses in Lionel Road and 428 on the Syon estate at Brentford End. In 1930 Brentford and Chiswick U.D.C., which was created in 1927 from a merger the two Urban Districts and which gained municipal

²⁷ Diane K Bolton, Patricia E C Croot and M A Hicks, 'Ealing and Brentford: Growth of Brentford', in *A History of the County of Middlesex: Volume 7, Acton, Chiswick, Ealing and Brentford, West Twyford, Willesden*, ed. T F T Baker and C R Elrington (London, 1982), pp. 113-120. British History Online <http://www.british-history.ac.uk/vch/middx/vol7/pp113-120> [accessed 5 September 2019].

²⁸ Weinreb, B et al eds 2008 *The London encyclopaedia*. 3rd rev. ed. London: Macmillan, 83.

borough status in 1932, owned 1,520 houses and flats. By the late 1930s, when land was in short supply, Brentford and Chiswick U.D.C. had erected only a small number of council houses and blocks of flats.²⁹

4. The Great West Road stimulated the suburbanisation of Osterley (part of the parish of Heston), and as noted, residential development around Boston Manor (which gained a station in 1934 as part of the Piccadilly line extension). However, Osterley Park, Syon Park and Boston Manor all retained much of their historic grounds and buildings, albeit increasingly fringed by suburbia.
1. Although there was extensive bomb damage to industrial works in Brentford's historic town centre during the war, except for the Packard Factory (which was completely destroyed in 1944),³⁰ the factories along the Great West Road escaped relatively unscathed. After the war, many were reused or converted into warehouses and offices.
2. By 1954 Brentford comprised three distinct districts, with the northernmost characterised by the factories in the Great West Road, and the surrounding municipal and private interwar housing. South of this were streets of terraced housing dating from c. 1870-1920. Beyond this lay the old town, comprising the docks area, High Street and the yards behind, and St. George's district, which included many slums.
3. By 1978 Brentford had ceased to be a centre of industry or trade and was inhabited mainly by council tenants, who worked elsewhere and often shopped in Ealing or Chiswick. The opening of the M4 in 1974 saw a decline in importance of the Great West Road, which was surmounted by a short, elevated section known as the Chiswick flyover, opened in 1959 and extended in the early 1960s. Some of the original factories were demolished (most notably the Firestone Tyre Factory, in 1980), and a 'ragbag of indiscriminately sited speculative offices and warehouses' sprang up, 'relieved only

²⁹ *Ibid.*

³⁰ Harold Clunn, *The Face of London* (1963), p. 503.

by one forthright purpose-built retail store at the west end'³¹ (the Brentford Homebase of 1987-88, built on the site of the Isleworth Winery (1928) which had an 'Art Deco facade ... with ... imitation wine press and barrel').³²

Built heritage

4. The Great West Road has been described as 'one of the finest arterial roads in the world'³³, and 'the chief showplace in outer London for the airy and hygienic factories of the light industries developed between the wars'³⁴. Its former 'Golden Mile' of exemplary interwar industrial architecture, including that at its intersection with Syon Lane (Gillette Corner) is of undoubted cultural and geographic significance. The Great West Road's factories became emblematic of a new era of streamlined, attention-grabbing and functionally efficient bypass factories, and although many were criticised for their perceived vulgarity or façade-making, they also found acclaim in some quarters. The urban biographer Howard Clunn thought

Those [factories] of the Pyrene Fire Extinguisher Company and others on the south side of the road and the Firestone Tyre & Rubber Company and Messrs Macleans the well-known chemists on the north side, call for special notice. They are faced with concrete and stand back some distance from the roadway behind private lawns, and when seen from a distance look more like the mansions of merchant princes and potentates of some great city of the East than modern factories. Such establishments prove conclusively that the requirements of industry are in no way incompatible with pleasant surroundings. That of the Gillette Safety Razor Company at the corner of Syon Lane, with its lofty clock-tower, looks like a Town Hall or Civic

³¹ Bridget Cherry and Nikolaus Pevsner, *The Buildings of England. London 3: North West* (2002), 385.

³² Phil Philo, GLIAS Notes and news, August 1987.

³³ Harold Clunn, *The Face of London* (1963), 502.

³⁴ Bridget Cherry and Nikolaus Pevsner, *The Buildings of England. London 3: North West* (2002), 385.

Centre ... Nearer town on the same side of the road is a distinctive new factory building erected in 1939 by Simmonds Products Limited ... a long concrete building of four stories with a centre section ten stories high which forms a conspicuous landmark in the district.³⁵

5. The unexpected demolition (on the eve of its statutory listing) of the Firestone factory catalysed a revaluation of such set-pieces, including the designation of some of those that survived redevelopment in the later 20th century. Other, non-industrial components of this interwar ribbon development have also been statutorily listed, and the following figure (Figure. A1) illustrates comprise all that has been listed (to date) of the 'Golden Mile'.

³⁵ *Ibid.*, p503.



Figure A1: Listed structures on the ‘Golden Mile’³⁶

Key:

Grade II listed

1. The Gillette factory (1937, Sir Banister Fletcher, architect). Date listed: 12-Feb-1981; List Entry Number: 1255219.
2. Four Lamp Standards with Lanterns outside the Gillette factory’s main entrance. Date listed: 21-May-1973; List Entry Number: 1067530.
3. Type K6 Telephone kiosk). Date listed: 15-Jan-1990; List Entry Number: 1096906.
4. National Westminster Bank (1935 by WFC Holden as the Osterley branch of the National Provincial Bank and designed to form a group with the Gillette Factory’). Date listed: 27-Apr-1993; List Entry Number: 1241144.
5. Part of former Coty factory premises (1933; Wallis, Gilbert and Partners; now Syon Clinic). Date listed: 12-Feb-1981; List Entry Number: 1270424
6. Church of St Francis of Assisi, No. 865 Great West Road (1933-5; E C Shearman). Date listed: 14-Jan-1994; List Entry Number: 1260608
7. Central gates, gate piers and railings to the former Firestone Factory (1928; Wallis, Gilbert and Partners). Date listed: 23-Oct-2001; List Entry Number: 1389664
8. Westlink House (former Pyrene II Factory) (1928; Wallis, Gilbert and Partners). Date listed: 12-Feb-1981; List Entry Number: 1255218
9. Warehouse, No. 991, Great West Road (1935-6 by F E Simpkins for Curry's Ltd as the distributive centre for their chain of shops). Date listed: 13-Jan-1994; List Entry Number: 1260638.
10. Homebase, Brentford. Certificate of Immunity Number: 1467343 Start Date: 03-Dec-2019 / Expiry Date: 02-Dec-2024

³⁶ Historic England <https://historicengland.org.uk/listing/the-list/map-search>

6. Not all surviving elements of the Golden Mile's interwar heyday have been statutorily listed: the Osterley Park Hotel, No. 764 Great West Road (a Neo-Tudor roadhouse), the Adini Building, No. 891 Great West Road (a 'Streamline Moderne' styled former Solder factory), and at the eastern end, Holly House (a four-storey block of flats) and Middlesex Court (a Neo-Georgian style block of former municipal offices) all presumably (and probably) fall below of the bar of listability. The Osterley Park Hotel is however locally listed.
7. Most of the Great West Road falls outside of the LB Hounslow's Conservation Areas. Only one, Spring Grove (designated in 2001 in recognition of the historic house of that name and the special interest of the Victorian suburban estate) runs alongside a small stretch of the western end of Great West Road, incorporating predominantly late 19th-century housing. As noted in the appraisal document, the Great West Road 'severed Thornbury Road and St. Mary's Crescent and in doing so divided Osterley and Spring Grove'³⁷.

Recent development

8. In contrast to Grimshaw's Homebase building, most (if not all) of what has been built from the 1980s along the 'Golden Mile' could be described as placeless and even mediocre – an unfortunate architectural downturn, given the quality of the first generation of roadside architecture. This includes the replacement to the Firestone factory ('impersonal speculator's showmanship ... from 1983, by Eric Askew & Partners, a series of mirror-glazed buildings grouped asymmetrically around Westcross House, a taller office block with free-standing uprights to give it added consequence'); a stretch of late 1980s speculative offices by Laing Property, some with 'domestic pitched pantiled roofs above blue-trimmed glazing', others 'in low pavilions away from the road'; the Gate Centre ('1980s hangars with ribbed cladding'); and Fountains Office

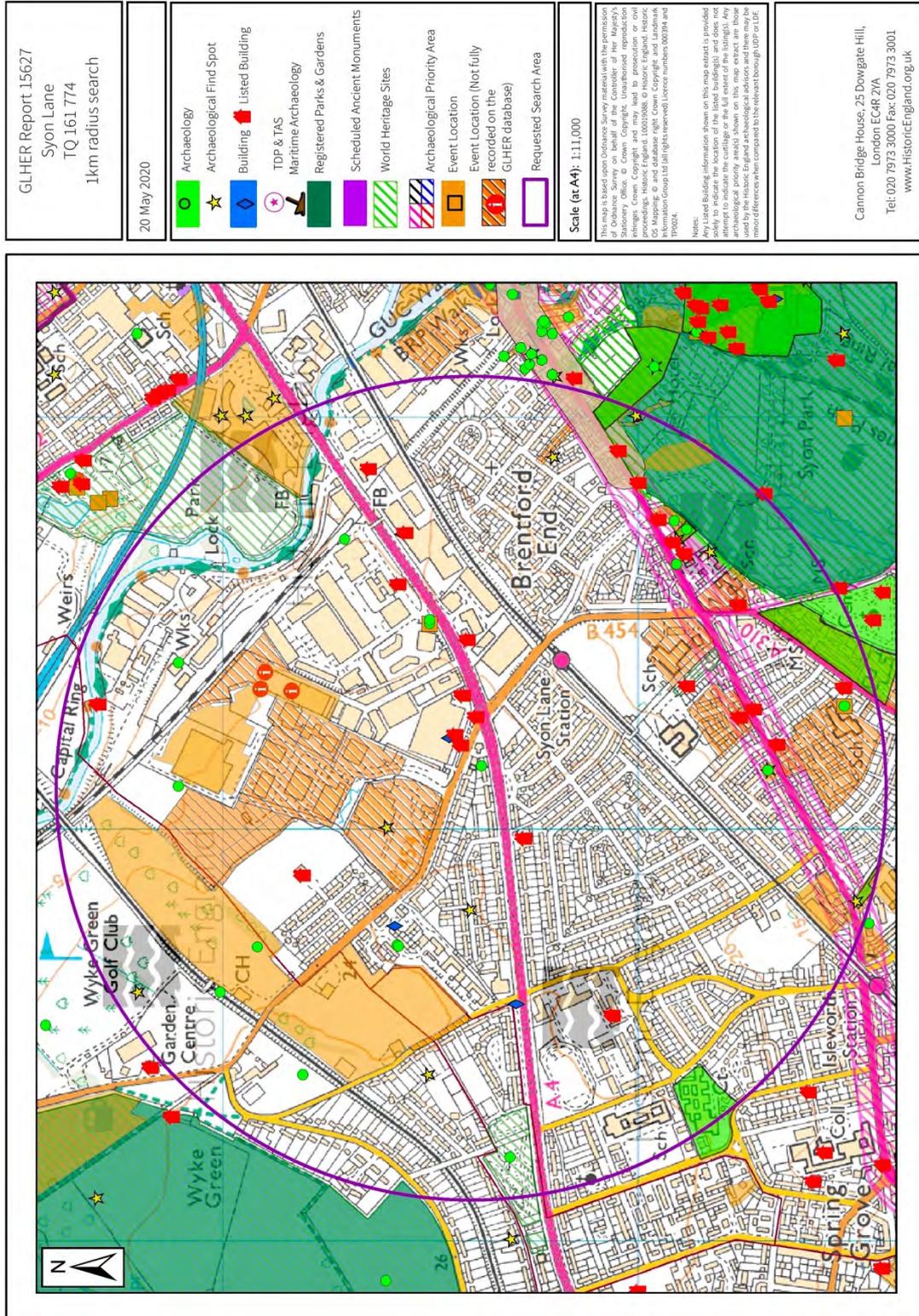
³⁷ L.B. Hounslow, 'Spring Grove Conservation Area Appraisal', 2.

Park, 1990-1 by Markheath Securities ('yellow brick with a plethora of post-modern trappings').³⁸

³⁸ Bridget Cherry and Nikolaus Pevsner, *The Buildings of England. London 3: North West* (2002), 386.

Appendix B: GLHER mapping

The distribution of heritage assets in the area of the site (the Greater London Historic Environment Record (GLHER)) (next page).



KMHeritage

72 Pymer's Mead

London SE21 8NJ

T: 020 8670 9057

F: 0871 750 3557

mail@kmheritage.com

www.kmheritage.com

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