

ENVIRONMENTAL STATEMENT VOLUME 2A: TOWNSCAPE, VISUAL AND BUILT HERITAGE ASSESSMENT ADDENDUM

1A TOWNSCAPE AND VISUAL

Introduction

- 1A.1 This chapter of the ES Addendum assesses the potential impacts and likely effects of the amended proposed development on townscape character and visual amenity at the site and within the study area. Consideration has also been given to the likely effects on three additional views as requested by the LBH post-submission of the application. The details of this additional assessment are presented in Appendix 1.9.
- 1A.2 The updated and additional assessments examine whether the amended proposed development would result in different conclusions to those of the townscape and visual assessment set out in the September 2020 ES.
- 1A.3 The updated and additional assessments presented in this ES Addendum should be read in conjunction with Chapter 1: Townscape and Visual of September 2020 ES Volume 2 and its appendices, as well as Appendices 1.7A-1.9A of this Addendum.

Methodology

- 1A.4 In respect of national and local legislation and policy, there have been no changes of relevance to the townscape and visual assessment since the September 2020 ES was completed.
- 1A.5 In respect of regional policy, it is noted that the Mayor of London formerly approved the Publication London Plan on 21 December 2020 and submitted it to the SoS. The Publication London Plan does not introduce any new matters for consideration in this updated townscape and visual assessment.
- 1A.6 As part of the post submission consultations with LBH Officers, three further representative views were requested for assessment to address comments from Historic England and the Kew Society. The additional assessments are set out within Appendix 1.9 of this ES Addendum. The three views are not identified within current planning policy and guidance documents.
- 1A.7 The post submission consultation comments from Royal Botanic Gardens Kew, the Kew Society and the Garden Trust are set out within Appendix 1.7. The response to these comments and justification to the selection for additional viewpoints that have been considered within this addendum in the context of the Appendix 1.7 suggestions and requests for additional viewpoints made by stakeholders are set out within Appendix 1.8.
- 1A.8 The assessment scope, baseline characterisation method and assessment methods remain valid for this updated townscape and visual assessment. It is noted that the proposed amendment to the depth of Block J to achieve a minimum clear distance of 18 m from the Oaklands Avenue Homes, the minor amendment to Block F and the mobility hub (previously referred to as Block K) would not have a material impact on the 3D model used in preparing accurate visual representation (AVRs).
- 1A.9 For the three additional views, R26 and R27 have been produced as AVRs in accordance with the methodology set out in the September 2020 TVIA's Appendix 1.5 Verified View Methodology. For R28, a non-verified computer-generated visualisation has been prepared. This follows the Type 3 visualisations in the Landscape Institute's Technical Guidance Note Visual Representation of Development Proposals (LI TGN 06/19). The computer-generated visualisation has been prepared using LIDAR data to estimate the location, the horizontal field of view of the supplied photograph was identified as 66 degrees using comparative techniques. The horizon level and direction of view were aligned, as well as the detail within LIDAR allowed. It is not a verified view but provides approximate basic graphic information to assist in describing the mass of the proposed development and its potential interaction with the receiving context.

- 1A.10 The cumulative schemes in Table 1.16 of the September 2020 TVIA are shown with magenta wirelines. The Homebase cumulative scheme is shown as a cyan wireline. When more than one cumulative scheme is visible in a view, they are described in the order in which they present from left to right.
- 1A.11 The assessment criteria, assumptions and limitations remain valid for this updated townscape and visual assessment.

Baseline Conditions

- 1A.12 The existing and future baseline conditions and sensitive receptors described in the September 2020 ES remain valid for this townscape and visual assessment.
- 1A.13 Three additional representative views have been selected to assess the effect of the proposed development on these views. The additional representative views are summarised in Table 1.7A and Table 1.8A. Their locations are illustrated in Figure 1.7A.

RV	Location	Comment
26	Old Isleworth Gate	Falls within the Botanical Gardens Kew World Heritage Site and a Conservation Area.
27	Thames Path	Falls within the Botanical Gardens Kew World Heritage Site and a Conservation Area.
28	Kew Gardens, Woodland Walk	Falls within the Botanical Gardens Kew World Heritage Site, Registered Park and Garden and a Conservation Area (non-verified)

RV	Location	Approximate Distance from closest Site boundary	Visibility (Existing)	Value
26	Old Isleworth Gate	1.48 km	No view	Medium to high
27	Thames Path	1.55 km	No view	High
28	Kew Gardens, Woodland Walk	1.47 km	No view	Medium

- 1A.14 The baseline photography and description of the representative views are provided in Appendix 1.9.
- 1A.15 The previously established sensitivity of the townscape receptors and visual receptor's representative views remains as set out within the September 2020 ES.
- 1A.16 The sensitivity of the additional three visual receptors' representative views are summarised in Table 1.10A and discussed in more detail within Appendix 1.9.

RV	Location	Value	Susceptibility to Change	Sensitivity
26	Old Isleworth Gate	Medium to high	High	High
27	Thames Path	High	High	High
28	Kew Gardens, Woodland Walk	Medium	High	Medium to high

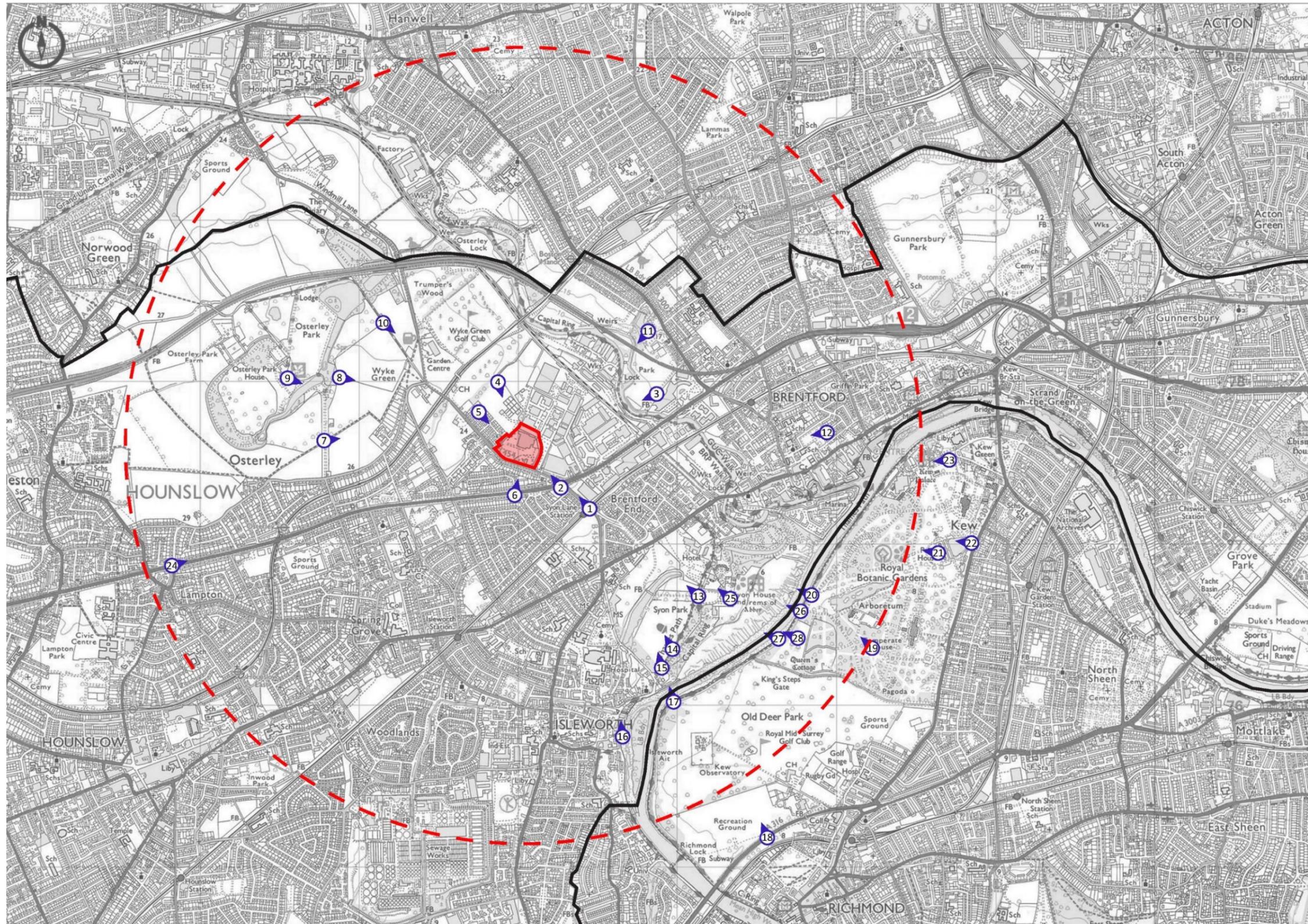


Figure 1.7A: Representative View Plan

Assessment of Effects

Demolition and Construction Effects

- 1A.17 The proposed amendments of relevance to this assessment (Block J and the increased distance from the Oaklands Avenue homes, options related to the bus route, as well as the introduction of flexibility in the location of the mobility hub) and amended proposed development as a whole, would not alter the demolition and construction effects on townscape and visual receptors as reported in the September 2020 ES.
- 1A.18 The changes to the proposed development would be experienced to a limited extent directly within townscape receptor TCA2: Osterley & Spring Grove non-residential and indirectly on the eastern edge of TCA5: Osterley, Spring Grove and Isleworth residential.
- 1A.19 The amendment to Block J would be experienced from the visual receptors of the residents in properties located adjacent to the site's northern boundary and from within the Goals Gillette Corner Sportsfield (representative view 4). The location of the mobility hub would be experienced by visual receptors associated with the Sky campus.
- 1A.20 The demolition and construction of the amended proposed development would result in limited localised changes to the townscape and visual receptor's representative views situation and would not give rise to any new or materially different effects.
- 1A.21 The demolition and construction effects on the additional three representative views are summarised in Table 1.12A and discussed in more detail within Appendix 1.9.

RV	Location	Sensitivity	Magnitude of impact	Likely Effect
26	Old Isleworth Gate	High	Low	Moderate Adverse
27	Thames Path	High	Low	Moderate Adverse
28	Kew Gardens, Woodland Walk	Medium to High	None	None

- 1A.22 The demolition and construction effect of the proposed development on the representative views 26 (old Isleworth Gate) and 27 (Thames Path) would result in significant adverse effects. This is because of the intermittent effect of the cranes associated with the construction of the proposed development.
- 1A.23 The nature of the impact of the demolition and construction works would vary throughout the entire demolition and construction period, with the completed proposed development's buildings obscuring views of the elements still under construction in later phases.

Completed Development Effects

- 1A.24 The proposed amendments of relevance to this assessment (Block J and the increased distance from the Oaklands Avenue homes, options related to the bus route, as well as the introduction of flexibility in the location of the mobility hub) and amended proposed development as a whole, would not alter the completed development effects on townscape and visual receptors as reported in the September 2020 ES.
- 1A.25 The changes to the proposed development would be experienced to a limited extent directly within townscape receptor TCA2: Osterley & Spring Grove non-residential and indirectly on the eastern edge of TCA5: Osterley, Spring Grove and Isleworth residential.
- 1A.26 The amendment to Block J would be experienced from the visual receptors of the residents in properties located adjacent to the site's northern boundary and from within the Goals Gillette Corner Sportsfield

(representative view 4). The location of the mobility hub would be experienced by visual receptors associated with the Sky campus.

- 1A.27 The completed amended proposed development would result in limited localised changes to the townscape and visual receptor's representative views situation and would not give rise to any new or materially different effects.
- 1A.28 The completed development effects on the three additional representative views are summarised in Table 1.14A and discussed in more detail within Appendix 1.9.

RV	Location	Sensitivity	Magnitude of impact	Likely Effect
26	Old Isleworth Gate	High	Very Low	Minor to Moderate Neutral
27	Thames Path	High	Very Low	Minor to Moderate Neutral
28	Kew Gardens, Woodland Walk	Medium to High	None	None

- 1A.29 The additional representative views 26 and 27 show that a limited glimpsed view would be possible to the amended proposed development in the far background of the view behind the mature trees of Syon Park along a section of the Thames Path. Non-verified representative view 28 further demonstrates that beyond the River Thames, vegetation prevents a view to the amended proposed development from the Royal Botanic Gardens.
- 1A.30 The effects would not be significant because the majority of the proposed development would be obscured by the mature trees present within Syon Park from these representative viewpoints. A limited glimpsed view would, however, be possible to the proposed development in the far background of the view. This visibility would be reduced in the summer when the trees present within Syon Park are in leaf. The effect is considered to be neutral because the change would have neither a beneficial nor adverse effect on the features of the view.
- 1A.31 No additional enhancement measures are required.

Assessment of Residual Effects

- 1A.32 The residual effects as reported September 2020 ES remain valid for the amended proposed development.
- 1A.33 No additional mitigation is recommended for the effects reported for the three additional views. Accordingly, the residual demolition and construction effects and completed development effects reported for the three additional views, remain as reported in the Assessment of Effects Section.
- 1A.34 No monitoring measures are required.

Summary of Residual Effects

- 1A.35 The summary residual effects as reported in Table 15 of the September 2020 ES remain valid. The table has been updated to include the additional three views (26-28) assessed as agreed with LBH.

Table 1.15A: Summary of Residual Townscape and Visual Effects

Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+	D	P	R	St Mt Lt
Demolition and Construction								
Townscape Character Area Receptors								
TCA1 – GWR Corridor	Minor changes in views due to removal of existing on-site buildings and structures, the enclosure of the site with hoarding and presence of taller elements	None required	Minor (not significant)	-	I	T	IR	Mt
TCA2 – Osterley & Spring Grove non-residential	Minor changes in views due to removal of existing on-site buildings and structures, the enclosure of the site with hoarding and presence of taller elements		Minor to Moderate (not significant)		D			
TCA3 – Historic Brentford and Isleworth	Glimpses of taller construction elements		Negligible (not significant)		I			
TCA4 – Brentford and South Ealing residential	Glimpses of taller construction elements		Minor (not significant)					
TCA5 – Osterley, Spring Grove and Isleworth residential	Minor changes in views due to removal of existing on-site buildings and structures, the enclosure of the site with hoarding and presence of taller elements		Minor to Moderate (not significant)					
TCA6 - Osterley Park	Glimpses of taller construction elements		Minor (not significant)					
TCA7 – Arcadian Thames and historic landscapes	Glimpses of taller construction elements		Negligible (not significant)					

Table 1.15A: Summary of Residual Townscape and Visual Effects

Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+	D	P	R	St Mt Lt
Visual Receptors Representative Views								
1	Syon Lane Station	None required	Minor (not significant)	-				
2	Junction of Syon Lane and Great West Road (A4)		Minor to Moderate (not significant)	-				
3	Boston Manor Park (footpath)		Minor (not significant)	-				
4	Goals Gillette Corner Sportsfield		Moderate (significant)	-	D	T	IR	Mt
5	Oaklands Avenue		Minor to Moderate (not significant)	-				
6	Pavement of GWR (A4)		Minor (not significant)	-				
7	Osterley Park (footpath)		Minor (not significant)	-				
8	Osterley Park (centre)		Minor to Moderate (not significant)	-				
9	Osterley House		None	-				
10	Osterley Park (bridleway)		Minor to Moderate (not significant)	-				
11	Boston Manor House		None	N/A	N/A	N/A	N/A	N/A

Table 1.15A: Summary of Residual Townscape and Visual Effects

Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+	D I	P T	R IR	St Mt Lt
12	St Paul's Recreation Ground	None	None	N/A	N/A	N/A	N/A	N/A
13	Syon Park (Gate Lodge)	Glimpses of taller construction elements	Minor	-				
14	Syon Park southern entrance footpath (north)	Glimpses of taller construction elements	Minor to Moderate (not significant)	-	D	T	IR	Mt
15	Syon Park southern entrance footpath (south)	Glimpses of taller construction elements	Minor	-				
16	Riverside Walk Isleworth	None	None	N/A	N/A	N/A	N/A	N/A
17	Riverside walk Kew	None	None	N/A	N/A	N/A	N/A	N/A
18	Old Deer Park	None	None	N/A	N/A	N/A	N/A	N/A
19	Botanical Gardens Kew, Cedar Vista east	None	None	N/A	N/A	N/A	N/A	N/A
20	Botanical Gardens Kew, Syon Vista/ Cedar Vista west	None	None	N/A	D	T	IR	Mt
21	Botanical Gardens Kew, west of the Palm House	None	None	N/A	N/A	N/A	N/A	N/A
22	Botanical Gardens Kew, close to 'the Botanical' building	None	None	N/A	N/A	N/A	N/A	N/A

Table 1.15A: Summary of Residual Townscape and Visual Effects

Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+	D I	P T	R IR	St Mt Lt
23	Botanical Gardens Kew, west of Elizabeth Gates	None	None	N/A	N/A	N/A	N/A	N/A
24	GWR and Jersey Road	Glimpses of taller construction elements	Negligible (not significant)	-	D	T	IR	Mt
25	Syon House	Glimpses of taller construction elements	Negligible (not significant)	-	D	T	IR	Mt
26	Old Isleworth Gate	Limited glimpses of taller construction elements	Moderate (significant)	-	D	T	IR	Mt
27	Thames Path	Limited glimpses of taller construction elements	Moderate (significant)	-	D	T	IR	Mt
28	Botanical Gardens Kew, Woodland Walk	None	None	N/A	N/A	N/A	N/A	N/A
Completed Development								
Townscape Character Area Receptors								
TCA1 – GWR Corridor	Glimpsed views of built form	None required	Minor (not significant)	+	I			
TCA2 – Osterley & Spring Grove non-residential	Introduction of built form and public realm		Minor (not significant)	+	D	P	IR	Lt
TCA3 – Historic Brentford and Isleworth	None		None	N/A	N/A	N/A	N/A	N/A
TCA4 – Brentford and South Ealing residential	Glimpsed views of built form		Negligible (not significant)	+/-			IR	Lt
TCA5 – Osterley, Spring Grove and Isleworth residential	Glimpsed views of built form		Minor (not significant)	+	I	P		

Table 1.15A: Summary of Residual Townscape and Visual Effects

Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+ -	D I	P T	R IR	St Mt Lt
TCA6 - Osterley Park	Glimpsed views of built form		Negligible (not significant)	+/-				
TCA7 – Arcadian Thames and historic landscapes	Glimpsed views of built form		Negligible (not significant)	+/-				
Visual Receptors Representative Views								
1	Syon Lane Station	Introduction of built form	Minor (not significant)	+				
2	Junction of Syon Lane and Great West Road (A4)	Introduction of built form	Minor to Moderate (not significant)	+				
3	Boston Manor Park (footpath)	Glimpsed views of built form	Negligible (not significant)	+/-				
4	Goals Gillette Corner Sportsfield	Introduction of built form	Moderate (significant)	+	D	P	IR	Lt
5	Oaklands Avenue	Introduction of built form	Minor to Moderate (not significant)	+/-				
6	Pavement of GWR (A4)	Introduction of built form	Minor (not significant)	+				
7	Osterley Park (footpath)	Glimpsed views of built form	Minor (not significant)	+/-				
8	Osterley Park (centre)	Glimpsed views of built form	Minor to Moderate (not significant)	+/-				
9	Osterley House	None	None	N/A	N/A	N/A	N/A	N/A
10	Osterley Park (bridleway)	Glimpsed views of built form	Minor to Moderate (not significant)	+/-	D	P	IR	Lt
11	Boston Manor House	None	None	N/A	N/A	N/A	N/A	N/A

Table 1.15A: Summary of Residual Townscape and Visual Effects

Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+ -	D I	P T	R IR	St Mt Lt
12	St Paul's Recreation Ground	None	None	N/A	N/A	N/A	N/A	N/A
13	Syon Park (Gate Lodge)	Glimpsed views of built form	Minor (not significant)					
14	Syon Park southern entrance footpath (north)	Glimpsed views of built form	Minor to Moderate (not significant)	+/-	D	P	IR	Lt
15	Syon Park southern entrance footpath (south)	Glimpsed views of built form	Minor (not significant)					
16	Riverside Walk Isleworth	None	None	N/A	N/A	N/A	N/A	N/A
17	Riverside walk Kew	None	None	N/A	N/A	N/A	N/A	N/A
18	Old Deer Park	None	None	N/A	N/A	N/A	N/A	N/A
19	Botanical Gardens Kew, Cedar Vista east	None	None	N/A	N/A	N/A	N/A	N/A
20	Botanical Gardens Kew, Syon Vista/ Cedar Vista west	None	None	N/A	N/A	N/A	N/A	N/A
21	Botanical Gardens Kew, west of the Palm House	None	None	N/A	N/A	N/A	N/A	N/A
22	Botanical Gardens Kew, close to 'the Botanical' building	None	None	N/A	N/A	N/A	N/A	N/A

Table 1.15A: Summary of Residual Townscape and Visual Effects

Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+ -	D I	P T	R IR	St Mt Lt
23	Botanical Gardens Kew, west of Elizabeth Gates	None	None	N/A	N/A	N/A	N/A	N/A
24	GWR and Jersey Road	None	None	N/A	N/A	N/A	N/A	N/A
25	Syon House	Glimpsed winter views of built form	Negligible	+/-	D	P	IR	Lt
26	Old Isleworth Gate	Limited glimpsed views of built form	Minor to Moderate (not significant)	+/-	D	P	IR	Lt
27	Thames Path	Limited glimpsed views of built form	Minor to Moderate (not significant)	+/-	D	P	IR	Lt
28	Botanical Gardens Kew, Woodland Walk	None	None	N/A	N/A	N/A	N/A	N/A

Notes:
* - = Adverse/ + = Beneficial/ +/- Neutral; D = Direct/ I = Indirect; P = Permanent/ T = Temporary; R=Reversible/ IR= Irreversible; St- Short term/ Mt -Medium term/ Lt -Long term.
**Negligible/Minor/Moderate/Major

Cumulative Effects

- 1A.36 The residual effects for the three additional views have been considered for the amended proposed development as a whole in Chapter 12A: Cumulative Effects of this ES Addendum.
- 1A.37 As no new cumulative schemes have been identified, the inter-project cumulative effects as reported in the September 2020 ES, remain valid.

Summary of Assessment

- 1A.38 The summary of the townscape and visual assessment has been updated to account for the three additional views assessed.

Background

- 1A.39 The assessment has considered the likely townscape and visual effects due to the demolition and construction stage and the completed development stage of the proposed development. The assessment has been undertaken taking into account the relevant national, regional and local guidance and regulations.

1A.40 The TVIA has been informed by a thorough study of the site and study area in respect of townscape setting and visual amenity. The assessment has comprised desktop research and field studies to identify and record the character of the townscape and understand the proposed development's visibility.

1A.41 The assessment has considered the proposed development's interaction with the identified seven townscape character areas (townscape receptors), whilst the visual impact assessment has considered the effect of the proposed development on the visual amenity experienced by people (visual receptors); this has been assessed through a series of representative views.

1A.42 The assessment has established the sensitivity of the townscape receptors and visual receptors' representative views and their capacity to accommodate the proposed development. Consideration has been given to embedded and additional mitigation measures to establish the magnitude of impact on these receptors and to determine the scale and significance of residual effects.

1A.43 The methodology for undertaking this assessment follows GLVIA3 and consultation has been undertaken with LBH Officers regarding the approach to the representative views used to inform the townscape and visual impact assessments.

[1A.43N1 Since the September 2020 ES was submitted, proposed amendments have been made and those relevant to this assessment are:](#)

- [Block J and the increased distance from the Oaklands Avenue homes;](#)
- [Minor amendments to the ground floor footprint of Block F; and](#)
- [Flexibility in the location of the mobility hub relating to the bus route options.](#)

[1A.43N2 The amended proposed development as a whole results in localised changes and would not alter the completed development effects on townscape and visual receptors as reported in the September 2020 ES.](#)

[1A.43N3 As part of the post submission consultations with LBH Officers, three further representative views were selected for assessment to address comments from Historic England, Royal Botanical Gardens Kew and the Kew Society. The additional assessments are set out within Appendix 1.9A of this ES Addendum.](#)

Demolition and Construction Effects

1A.44 The site falls within TCA2 - Osterley & Spring Grove non-residential and the demolition and construction of the proposed development would result in a **Minor to Moderate Adverse** effect on TCA2.

1A.45 Glimpsed views to the proposed development's cranes and construction hoarding are likely to be visible from TCA1 - GWR Corridor, TCA4 - Brentford and South Ealing residential and TCA5 - Osterley, Spring Grove and Isleworth residential and, to a limited extent, from TCA3 - Historic Brentford and Isleworth, TCA6 - Osterley Park and TCA7 - Arcadian Thames and historic landscapes. This would result in a **Moderate Adverse** effect on TCA6 - Osterley Park; a **Minor to Moderate Adverse** effect on TCA5 - Osterley, Spring Grove; a **Minor Adverse** effect on TCA1 - GWR Corridor and TCA4 - Brentford and South Ealing residential, and a **Negligible Adverse** effect on TCA3 - Historic Brentford and Isleworth and TCA7 - Arcadian Thames and historic landscapes. No additional mitigation measures are proposed.

1A.46A The impact of the demolition and construction on the site would be limited to the visibility to the associated cranes and scaffolding related to the proposed development. This would lead to the following [temporary](#) effects on the representative views:

- **Moderate Adverse** (significant) – RV4 Goals Gillette Corner Sportsfield; [RV26 Old Isleworth Gate and RV27 Thames Path](#);
- **Minor to Moderate Adverse** – RV2 Junction of Syon Lane and Great West Road (A4); RV5 Oaklands Avenue; RV8 Osterley Park (centre); RV10 Osterley Park (bridleway); and RV14 Syon Park southern entrance footpath (north).

- **Minor Adverse** – RV1 Syon Lane Station; RV3 Boston Manor Park (footpath); RV6 Pavement of GWR (A4); RV7 Osterley Park (footpath); RV13 Syon Park (Gate Lodge); and RV15 Syon Park southern entrance footpath (south). RV12 St Paul’s Recreation Ground and RV17 Riverside Walk.
- **Negligible Adverse** – RV24 GWR and Jersey Road; and RV25 Syon House.

1A.46 The construction of the proposed development would not affect the remaining representative views. No mitigation measures are proposed.

Completed Development Effects

1A.47 The proposed development falls within TCA2 - Osterley & Spring Grove non-residential. Upon completion and operation, the proposed development would result in a **Minor Beneficial** effect on the townscape character of this area. This is due to the improvement delivered in respect of the existing townscape quality and condition through the replacement of an unattractive site with a well-designed development, creating a new, vibrant quarter and providing a focus for the community.

1A.48 Glimpsed views to the proposed development are likely to be visible from TCA4: Brentford and South Ealing residential and TCA5: Osterley, Spring Grove and Isleworth residential and to a limited extent from TCA2: Osterley & Spring Grove non-residential, TCA6: Osterley Park and TCA7: Arcadian Thames and historic landscapes. This would result in a **Minor Beneficial** or **Neutral** indirect effect to TCA4: Brentford and South Ealing residential, TCA5: Osterley, Spring Grove and Isleworth residential, TCA6: Osterley Park and TCA7: Arcadian Thames and historic landscapes and a **Negligible Neutral** indirect effect on TCA2: Osterley & Spring Grove non-residential. The proposed development would not affect TCA3: Historic Brentford and Isleworth. No mitigation measures are proposed.

1A.49 Due to the relatively flat landform in the area, the proposed development’s visibility would extend beyond the immediate surroundings. Glimpsed views of the proposed development would be possible from areas of the surrounding public open space areas such as Goals Gillette Corner Sportsfield, Syon Park and Osterley Park. Linear views would also be possible from the roads orientated towards the proposed development such as Oaklands Avenue and Syon Lane itself. It is considered that views would also be possible from the surrounding properties that have windows which look towards the proposed development.

1A.50A This would lead to the following effects on the representative views:

- **Moderate Beneficial** (significant) – RV4 Goals Gillette Corner Sportsfield;
- **Minor to Moderate Beneficial** – RV2 Junction of Syon Lane and Great West Road (A4);
- **Minor to Moderate Neutral** – RV5 Oaklands Avenue; RV8 Osterley Park (centre); and RV10 Osterley Park (bridleway); RV14 Syon Park southern entrance footpath (north), [RV26 Old Isleworth Gate](#) and [RV27 Thames Path](#);
- **Minor Beneficial** – RV1 Syon Lane Station; and RV6 Pavement of GWR;
- **Minor Neutral** – RV7 Osterley Park (footpath); RV13 Syon Park (Gate Lodge); and 15 Syon Park southern entrance footpath (south);
- **Negligible Neutral** – RV25 Syon House;

1A.51 The proposed development would not affect the remaining representative views. No mitigation measures are proposed.

Cumulative Effects

1A.52 The assessment of inter-project cumulative effects has identified that the cumulative effects resulting from the demolition and construction stage and from the completed development on townscape character would be no greater than the proposed development in isolation.

1A.53 Due to the proximity and scale of cumulative scheme ref. 9 (Homebase, Syon Lane), the cumulative visual effects during the demolition and construction stage would be greater for three representative views:

- **Moderate to Major Adverse** (significant) - RV1 Syon Lane Station; and
- **Minor to Moderate Adverse** – RV13 Syon Park Gate Lodge and RV15 Syon Park footpath (north)

1A.54 Due to the proximity and scale of cumulative scheme ref. 9 (Homebase, Syon Lane), the cumulative visual effects for the completed proposed development would be greater for two representative views:

- **Moderate to Major Beneficial** (significant) - RV1 Syon Lane Station; and
- **Moderate Neutral** – RV15 Syon Park footpath (north)

APPENDIX 1.7:

Post submission consultation comments

Planning & Development
London Borough of Hounslow,
Hounslow House
7 Bath Road
Hounslow
TW3 3EB

For the attention of Shane Baker, Case Officer

18 November 2020

Dear Shane,

Planning Application: HOMEBASE LTD & TESCO SUPERSTORE, SYON LANE, ISLEWORTH TW7
Planning Application ref: P/2020/3099 & 3100

The Kew Society (registered Charity no. 1173016) is more than 100 years old and dedicated to enhancing the beauty of Kew and preserving its heritage. The Society has a fee-paying membership of over 800.

Objections

The Kew Society wishes to object to the above planning applications, and to request additional Views westwards towards the proposed developments from inside the Royal Botanic Gardens Kew, to be able to make a more valid assessment of the impact of the proposed development from vistas within RBG Kew.

The two applications raise similar issues of intrusive and inappropriate building heights and we are addressing both applications together in this letter.

We support the objections submitted by the Brentford Community Council/Brentford Voice, the Osterley & Wyke Green Residents' Association (OWGRA) and The Isleworth Society. In particular, the inappropriately tall buildings will harm the settings of nearby heritage assets (listed and non-listed) and overwhelm the predominantly two-storey character of the surrounding residential area.

We note and support Historic England's comments (their letter of 20 May 2020) that:

Historic England recognises the development potential of the site. However, we have Grade I registered landscape, which is a highly designated and important heritage asset. We recommend that further analysis of significance in order to better understand the impact of the development and inform design revisions to avoid or minimise harm. This is likely to involve a reduction in height. We also recommend further investigation in order to determine the possible extent of the impact on the Royal Botanic Gardens, Kew World Heritage Site.

and

Views from Kew, the river itself and the tow path are some of the most important of Syon House and Park. We do not consider that we have sufficient information in order to be confident that the proposed development would not appear in this backdrop, which would likely have a detrimental impact on the significance of both the registered landscape and Kew World Heritage Site. We recommend a further views study in order to establish this.

Whilst we fear that the proposed tower blocks will have a materially adverse impact on the vistas from both RBG Kew and Syon Park, we focus here on their impact on Kew Gardens.

The Hounslow Local Plan is very clear about the impact of tall buildings on heritage assets and the World Heritage site:

CC3 (Tall Buildings) states that Tall buildings should *'be carefully placed so as not to create a wall of tall buildings, ensuring they relate sensitively to surrounding residential areas and do not have a significant adverse impact on the setting of, or views from heritage assets including Gunnersbury Park, Royal Botanic Gardens Kew World Heritage Site, Syon Park and Osterley Park...'*

CC4 (Heritage) states that all developments should *'Conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance'* and that developments should *'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'*.

The Draft New London Plan (2019) has similar comments in Policy D9 (Tall buildings) and Policy HC1 (Heritage conservation and growth).

The applicant's Heritage Statement for the Homebase application concludes that *'there will be a minimal effect on the setting of heritage assets further afield, such as Syon Park, Osterley Park and Boston Manor, and no effect on the Kew World Heritage Site'*. We disagree strongly with this assessment.

The Environmental Statement for the Homebase application states:

8.169. The Development would not be visible within the formal or designed views and vistas within the Royal Botanic Gardens, Kew WHS. Also the identified vistas set out within the Thames Landscape Strategy. We disagree with this assessment also.

In summary, we believe that the applications represent massive and intrusive overdevelopments and should be rejected as proposed; and that there is insufficient information provided to arrive at a true assessment of the adverse visual impact from RBG Kew.

Visual Impact Assessments: New Views Required

We should note that the Views in the VIA at Appendix 8.3 were, we understand, chosen as a series of set 'formal or designed views or vistas', which implies a fixed number of valuable views. We believe that a sense of which views are important is now much more dynamic, incorporating the idea that important views unfold from different angles as people walk around different parts of the Gardens. This is evidenced in the World Heritage Site Management Plan 2019-2025, which states:

It is important to recognise that the experience of Kew is not a static one; it is not a series of individual views. All the phases of landscape design at the site since the 18th century have been dynamic in their intention – these landscapes are places to move within and to have experiences within. This combination of movement and separation from the outside world creates a dynamic internally focussed experience. (D8(iii). Walks, promenades and routes).

The most relevant View in the VIA (at Appendix 8.3) is number 14, *Syon Park southern entrance footpath (north)*. This shows a rendered image of intrusive blocks on the horizon to the right of the Gillette tower (p 47-48). This is, we believe, from the easternmost part of Syon Park and would equate broadly to a view from inside the Gardens over the Old Isleworth Gate (the Grade II listed 'Isleworth Drawbridge and Ferry Gate'), which used to give access into Kew Gardens from the towpath. This is several tens of metres south of where the RBGK Syon Vista meets the river - where the benches are, i.e. View 20.

However, View 14 is from Syon Park, not Kew Gardens, and **we think a View should be taken from just inside the Old Isleworth Gate looking in the same direction as View 14**. This is because the shielding effect of the trees is likely to be reduced given the further distance of such a view from south of the river; hence the impact of the proposed developments could be greater from just within the Gardens.

As noted in comments provided to you by the consultant to RBG Kew, there are additional concerns:

That westward views from further south of the Old Isleworth Gate, both inside the Gardens and on the towpath ('Arcadian Thames' views), will be adversely affected, so **views from several points inside and outside the Gardens should be provided to assess the impact;**

That the vista westwards from the southern edge of the lake (which is adjacent to the Syon Vista pathway) could be adversely impacted by the proposed developments if the rushes, currently planted, were to be repositioned or removed: we should note that the design of different aspects of the Gardens is not static and evolves over time. **We would like to see, if possible, a View westwards from this location towards the Gillette tower, including a rendering of the proposed developments.**

It should be emphasised that this view west from Kew Gardens is relatively unspoilt, particularly compared with the views now being - and expected to be - experienced northwards from Kew Gardens across the river to the tall buildings going up in the new developments in Brentford East. **It is crucial to keep this westward panorama unspoilt**, particularly given, as the Historic England letter notes, that Syon Park 'forms an essential relationship with the Royal Botanic Gardens, Kew World Heritage Site, falling within its buffer zone and together forming a pair of substantially intact Brownian landscapes of the highest significance'. A good encapsulation of this vista is given in View 20 of the Visual Impact Assessment:





Blocks of tall buildings looming clearly on the horizon will have a materially adverse impact on the views westward from the Gardens and should be resisted: currently, the horizon in View 14 is pierced by the Gillette tower, whose impact - as noted by Historic England - is more akin to a pleasant church spire than an intrusive tower block. From a number of surrounding vistas the view of the tower is likely to be blocked by the proposed developments.

We would be grateful if you would acknowledge receipt of this letter to planning@kewsociety.org.

Yours Sincerely,

John Ricketts
Planning Trustee
The Kew Society



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4th December 2020

Research - Conserve - Campaign

Shane Baker Esq
London Borough of Hounslow
Hounslow
London TW3 4DN
planning@hounslow.gov.uk

Dear Mr Baker,

Ref : P/2020/3099 & P/2020/3100 - Full planning application for the demolition of existing building and car park and erection of buildings to provide 473 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 (400 customer spaces and 105 residential spaces), landscaping and associated works. Homebase Ltd, Syon Lane, Isleworth TW7 5QE

Thank you for consulting The Gardens Trust (GT) in its role as statutory consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. We are responding to both the above applications in one letter as they are inextricably linked. A colleague made a site visit over the weekend and the following comments are based on their observations and the supplied online documentation.

We disagree with the developer's assessment of magnitude of impact and the significance of effect upon the Registered Parks & Gardens (RPG) of Grade II* Osterley, Grade I Kew and Grade I Syon Park. In our opinion, their assessment of significance of effect is inaccurate for its appraisal of the effect on views from all three, unrealistically minimising the effect and damage inflicted, and omitting a number of key views.

Osterley Park will be the worst affected, suffering the greatest physical change. Paradoxically, the impact on the significance of Osterley is not necessarily as great as on Kew World Heritage Site (WHS) or Syon (within the WHS zone and which has potential for inclusion in the WHS). Even so, at Osterley these are major incursions into what is still an Arcadian haven in a busy part of west London. The flat park has the feel of heathland: i.e. expansive with extensive sweeps of sky space. The schemes by rising above it offend the designed spirit of place in that sense. While big buildings have appeared around the site - GSK, Kew Eye - these are further away and lower than the proposals. The current proposals will have a considerably greater effect than these existing developments.

At Osterley, using the Gillette Tower as a reference point (as the developments will be taller and will flank it), it is apparent that the development of the Tesco site will be more damaging than that at Homebase as it is nearer and larger. In this respect View 7 is misleading as the view chosen, and View 8 shows clearly that the buildings will be highly visible. View 10, euphemistically called 'bridleway', is historically the main London approach to the mansion across the park, from the south-east from Osterley Lane and Wyke Green, and has been for centuries. The NT, it seems, made the current south drive the main approach, but this drive was later, built in the 1880s, as the railway station approach. The SE Wyke Green entrance

has two impressive lodges, reputed to be by Adam and altered in the C19, and an Adam gateway for which drawings survive in the Soane Museum (all listed). The developments will be seen in south-easterly views alongside this ensemble viewed along the exit from the mansion, as shown by the photos supplied in the TVIAs. This is perhaps most serious for this site as the drive is the most important historic approach, and it affects the listed Adam gateway/lodges.

The views the developers have identified at Osterley are not the only ones there which will be damaged. The 1880s south drive, now used as the main drive, will also 'enjoy' multiple views of the development to the east. There may be an effect on the north drive from which the tower is sporadically visible along it.

The pleasure ground west of the mansion also needs to be checked despite apparent dense screening by trees. My colleague was unable to assess this aspect to ascertain whether the Gillette tower could be seen from the pleasure ground walk behind/west of the mansion. Views from the lake at the SE corner of the pleasure ground walk and from the Cedar Grove should also be checked. Finally, there is no consideration of views from the park north of the M4. This should also be reviewed.

We urge your officers to require that these views are added to the TVIA so the damage can be realistically assessed. Please see attached photos below which support our opinion above.

Turning to Syon Park, from the submitted TVIAs, representative views shown in the Syon Lane Homebase Visual Impact Assessment (SLHVIA), representative views 13, 14 and 15 all indicate that the new structures will appear in the skyline, considerably damaging the setting of Syon. Views will be affected at multiple points along the south drive and from the adjacent park, View 14 from the Syon Park South Drive being especially intrusive and damaging. The Tesco TVIA's illustrative renders show a similar picture. We disagree with the applicant's assessment that (SLHVIA view 8) this impact is '*minor to moderate adverse*' and other similar comments appraising the damage to the views referred to above. We consider the strong cluster of buildings, in particular the tall Homebase, will have a considerably damaging effect on these important views. We strongly disagree with the conclusions of the Heritage Statement which says that the proposed scheme will 'on balance, preserve the setting of the heritage assets and not cause harm to their heritage significance.' Should this permanent visual intrusion into what until now has been a largely unspoilt setting on the edge of London be permitted, it will set an unwelcome precedent for further commercial development to be allowed to cause damage in similar manner. The loss of significance to these unique and irreplaceable heritage assets is in no way compensated by public benefit.

We have seen the letter regarding this application from Dr Sarah Rutherford dated 17th November 2020 setting out the effects upon Kew and Syon in particular. To avoid duplication, we are not repeating the points she made in this correspondence but wish to have it on record that we entirely endorse her comments. We have grave concerns that additional views, as yet unaddressed, are likely to be harmed, especially from the riverside by the Royal Botanic Garden, Kew. We urge your officers to ask the applicant to provide further views analysis in order to obtain a full and objective understanding of the effects on these landscapes.

The Gardens Trust strongly objects to the above applications.

Yours sincerely,

Margie Hoffnung
Conservation Officer

**Osterley Park, South Drive, views of Gillette Tower to South-East
as reference point taken from various viewpoints.
This view has not been identified in the TVIAs.**



South End



Central Section



Central Section



North End

Mr Shane Baker
Planning Department
London Borough of Hounslow
Hounslow House
7 Bath Road
Hounslow TW3 3EB

07th January 2021

System Reference: P/2020/3099 & P/2020/3100

Dear Mr Baker,

Homebase and Tesco sites, Syon Lane

I am writing to you concerning these applications following our review of the TVIAs on site. This letter confirms recent emails and the discussion during your site visit on 4th December.

In our view the applications are incomplete, with the TVIA for both applications lacking key views. Whilst we are unable to make a definitive assessment with the information provided, based on what we have seen we object to this application.

The areas of Kew Gardens affected by the proposed developments are the end of Syon Vista and further south west around the "Woodland Walk" and approaching the site boundary adjacent to the river. These views across the river currently benefit from a backdrop of trees, unspoilt by urban intrusion.

Kew Gardens has a formative relationship with the river, which has been a key influence for successive landscape designers. The intent has always been to increase the Arcadian and rural experience at the site, and so the relationship with the Thames has been carefully managed to maximise this atmosphere whilst the setting around Kew Gardens has historically changed. There are carefully controlled ground level views in and out of the gardens, predominately shutting out urban views to reinforce the sense of a rural, exotic and 'otherworldly' landscape. The expansive vista across the Thames to the 'Capability' Brown designed Arcadian landscape and classical buildings of Syon Park are one of the key instances where an external view has been opened up and visually linked, contributing to the character and design intent of the Kew Gardens landscape.

In terms of contribution to Outstanding Universal Value of the WHS, this vista includes the work of internationally famous landscape designers, illustrating significant periods in 18th- and 19th-century garden design, and the influence of the site in diffusing these ideas around the world. The relationship with the Thames at this point of the Gardens epitomises aspects of the English Landscape Garden movement which is a key contributing attribute to the WHS significance. The Kew Gardens World Heritage Site Management Plan 2020-2025 defines the setting of the WHS, and further expands on the significance of this relationship and contribution to OUV:

https://www.kew.org/sites/default/files/2020-05/12293_World%20Heritage%20Site%20Management%20Plan_A4_ISD%20AC.pdf

Based on the information supplied, it is apparent to RBG Kew that the proposed development will be visible above the tree line to the right of Syon House and will have a significant impact on the setting of this area of very high sensitivity. The application sites are on rising ground beyond Syon and it is possible to see the tower of the Gillette building within the tree belt, when in line with the Isleworth Gate (itself a listed structure), which serves to locate the position of the proposed developments to the right of Syon House. From this location, the medium-rise industrial and commercial buildings along Great West Road, e.g. Sky, are screened.

Moving further south west in Kew Gardens, Syon House appears as a three-quarter view due to the curve of the river (a view as painted by George III.) The relative position of Syon House to the proposed developments will also change at this point, with the proposed developments first moving behind Syon House (possibly being visible above it) before emerging to its left.

In order to test the magnitude of these impacts, we have requested additional views to be added to the TVIA from the following locations:

1. Within Kew Gardens in line with Isleworth Gate, about 25 m behind the gate.
2. From the Woodland Walk, preferably with a clear line of sight to Syon House
3. A three-quarter view of Syon House from the south west as the George III painting view, again with a clear line of sight, so likely to be close to the site boundary.
4. A view from the south side of the lake looking towards the river. This area is quite enclosed at the moment, but that may not always be the case.

We would be able to comment more fully once we have received this additional information.

Yours sincerely,



Georgina Darroch
RBG Kew, World Heritage Site Coordinator

cc Mr Alexander Bowring Historic England
Mr Henry Owen-John Historic England
Ms Nicolette Duckham London Borough of Richmond

