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# OSTERLEY PLACE

## TESCO, OSTERLEY SITE, TW7 5NZ

### VOLUME 2: TOWNSCAPE, VISUAL AND BUILT HERITAGE ASSESSMENT

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# Volume 2: Townscape, Visual and Built Heritage Assessment

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# 1 TOWNSCAPE AND VISUAL

## Introduction

- 1.1 This chapter of the ES reports on the likely significant townscape and visual effects to arise from the demolition and construction stage and from the completed development stage of the proposed development.
- 1.2 The chapter describes the townscape and visual policy context; the methods used to assess the potential impacts and likely effects; the baseline conditions at and surrounding the site; the likely townscape and visual effects taking into consideration embedded mitigation; the need for additional mitigation and enhancement; the significance of residual effects; and inter-project cumulative effects.
- 1.3 The chapter is supported by the following technical appendices:
- Technical Appendix 1.1: Legislation, Planning Policy and Guidance;
  - Technical Appendix 1.2: Townscape and Visual Assessment Methodology;
  - Technical Appendix 1.3: Visual Impact Assessment;
  - Technical Appendix 1.4: Viewpoint 2 with Central Horizon;
  - Technical Appendix 1.5: Accurate Visual Representations Methodology; and
  - Technical Appendix 1.6: Illustrative Renders.

## Methodology

- 1.4 The assessment has been informed by the following legislation and policies:
- International Legislation:
    - The European Landscape Convention<sup>1</sup> (ELC);
  - National Legislation and Policy:
    - NPPF 2019<sup>2</sup>;
    - PPG<sup>3</sup>;
  - Regional Policy:
    - London Plan<sup>4</sup> (2016) in particular policies '7.1(D) - Building London's Neighbourhoods and Communities'; '7.4 - Local Character'; '7.7 - Tall and Large Buildings'; '7.11 - London

<sup>1</sup> Council of Europe (2007) *The European Landscape Convention*

<sup>2</sup> CLG (2019) *National Planning Policy Framework*

<sup>3</sup> CLG (2014) (web based) *Planning Practice Guidance*, <http://planningguidance.planningportal.gov.uk/blog/guidance/>

<sup>4</sup> Greater London Authority (2015) *The London Plan: Spatial Development Strategy for Greater London (Adopted March 2015) (Further Alterations to the London Plan)*

View Management Framework'; '7.12 - Implementing the London View Management Framework;

- Intend to Publish London Plan (2019)<sup>5</sup> in particular in particular policies 'D1 - London's Form, Character and Capacity for Growth'; 'D3 - Optimising Site Capacity through the Design-led Approach'; 'D9 - Tall Buildings'; 'HC3 - Strategic and Local Views'; 'HC4 - London View Management Framework'; 'SD1 - Opportunity Areas';
- Local Policy:
  - Hounslow Local Plan 2015 to 2030 Volume One (2015)<sup>6</sup> in particular policies 'SC4 - Scale and Density of New Housing Development'; 'CC1 - Context and Character'; 'CC2 - Urban Design and Architecture'; 'CC3 - Tall Buildings'; 'CC4 - Heritage'; 'SV1 - Great West Corridor Plan;
  - Draft LBH Great West Corridor Plan Local Plan Review<sup>7</sup> in particular draft policies 'GWC5 - Design and Heritage'; 'P1 - Great West Corridor West'; and
  - GWC Masterplan and Capacity Study<sup>8</sup> and supporting Appendix: Views Testing<sup>9</sup>;
- Guidance:
  - GLA Shaping Neighbourhoods: Character and Context SPG<sup>10</sup>;
  - LBH's Urban Context and Character Study<sup>11</sup>;
  - Royal Botanic Gardens, Kew World Heritage Site Management Plan<sup>12</sup>; and
  - Thames Landscape Strategy<sup>13</sup>.

1.5 Further details of the legislative context are provided in Technical Appendix 1.1 of this Volume.

## Consultation

- 1.6 An EIA Scoping Report<sup>14</sup> was submitted to the LBH on 31 July 2019 in support of a request for a formal EIA Scoping Opinion (provided in Technical Appendix 2.1, ES Volume 3). The LBH issued an EIA Scoping Opinion on 13 September 2019 (Technical Appendix 2.2, ES Volume 3). Two further Scoping update letters were issued by Ramboll to LBH to confirm that subsequent design changes did not affect the originally proposed scope of the EIA and therefore the EIA Scoping Report and LBH EIA Scoping Opinion remained valid.
- 1.7 Table 1.1 summarises the consultation that has been undertaken with respect to townscape and visual matters.

<sup>5</sup> Greater London Authority (2019) Intend to Publish *The London Plan: Spatial Development Strategy for Greater London*

<sup>6</sup> London Borough of Hounslow (2015) *London Borough of Hounslow Local Plan 2015-2030*

<sup>7</sup> London Borough of Hounslow (2017) *Draft Great West Corridor Local Plan Review (Volume 4)*

<sup>8</sup> London Borough of Hounslow (2019) *GWC Masterplan and Capacity Study*

<sup>9</sup> London Borough of Hounslow (2019) *GWC Masterplan and Capacity Study Appendix: Views Testing*

<sup>10</sup> Greater London Authority (2014) *Shaping Neighbourhoods: Character and Context Supplementary Planning Guidance*

<sup>11</sup> London Borough of Hounslow (2014) *Urban Context and Character Study*

<sup>12</sup> Royal Botanic Gardens (2020) *Royal Botanic Gardens, Kew World Heritage Site Management Plan*

<sup>13</sup> The Thames Landscape Strategy (1994; reviewed 2012) *The Thames Landscape Strategy Hampton to Kew*

<sup>14</sup> Ramboll (2019) *Osterley Tesco, Syon Lane, Isleworth: Environmental Impact Assessment Scoping Report, July 2019*

**Table 1.1: Summary of Consultation**

Consultee and Form/Date of Consultation	Summary of Comments	Where in this Chapter Comments are addressed
LBH Assistant Director Planning and Development Growth Sarah Scannell	The LBH was in agreement with the viewpoint locations identified in the 'Representative View Selection Note' prepared by Arc Landscape.	
Written response to pre-application consultation with LBH held on 21 August 2019 (written response dated 13 September 2019.)	The use of tilt-shift should be avoided. The methodology only specifies that long range views should not be taken with shift lens; the site is not in a city centre location, where space is tight, and therefore there is no reason to use tilt shift for any of the images.	A standard lens has been used for each Representative View (RV) shown in Technical Appendix 1.3, with the exception of RV no. 2 which is located close to the site and contains a tall element of built form (the Gillette clock tower); for this view a vertical shift lens has been used to ensure that the whole of the clock tower is accommodated within the view. For comparison, an accurate verified view (AVR) based on photography which does not utilise a shift lens is provided for this view in Technical Appendix 1.4. This AVR does not alter the findings of the assessment set out in Technical Appendix 1.3.
	When presenting the views within the Townscape Visual Impact Assessment, these should include renderings of the proposal rather than wireline outlines where the proposed buildings would be apparent.	Since this is an outline application and detail of materials, fenestration, façade treatments etc would be reserved, the assessment of townscape and visual effects has been based on wirelines showing the massing of the Maximum Heights Parameter Plan. However illustrative rendered versions of four of the more sensitive long-distance

**Table 1.1: Summary of Consultation**

Consultee and Form/Date of Consultation	Summary of Comments	Where in this Chapter Comments are addressed
		views have been prepared to illustrate how the design and materials could mitigate the effect of the massing (see Technical Appendix 1.6).
LBH Deputy Head of Opportunities Areas and Growth Shane Baker Scoping Opinion dated 13 September 2019.	The scope of the TVIA was generally agreed, subject to a detailed explanation of the methodology used to produce any visual representations.  For longer distance views it is recommended that the methodology consider the Landscape Institute's guidance for Visual Representations of Development Proposals – TGN 06/19.  Tilt-Shift lenses should only be used to accommodate the verticality of the development.  AVRs should be annotated to show: <ul style="list-style-type: none"> <li>• what lens was used;</li> <li>• if the images have been cropped or the photographer has applied tilt, vertical rise or horizontal shift during the taking of the shot; and</li> <li>• clear markings on the image to identify the point of perspective.</li> </ul>	The full methodology used to produce the AVRs is provided in Technical Appendix 1.5 of this Volume.  A standard lens has been used for each Representative View shown in Technical Appendix 1.3, excepting RV no. 2 which is located close to the site and contains a tall element of built form (the Gillette clock tower). For this view a vertical shift lens has been used to ensure that the whole of the clock tower is accommodated within the view. For comparison, an AVR based on photography which does not utilise a shift lens is provided for this view in Technical Appendix 1.4. This AVR does not alter the findings of the assessment set out in Technical Appendix 1.3.  All AVRs are annotated with clear markings to identify the point of perspective. The approach to preparing the AVRs is set out within Technical Appendix 1.5 of this Volume and include a reference to the type of lens used.

Table 1.1: Summary of Consultation		
Consultee and Form/Date of Consultation	Summary of Comments	Where in this Chapter Comments are addressed
LBH Deputy Head of Opportunities Areas and Growth Shane Baker Pre-application consultation response in email dated 10 February 2020.	Request to provide the methodology used in preparing the AVRs.	The approach to preparing the AVRs is set out within Technical Appendix 1.5 of this Volume.
	The viewpoints should incorporate renderings of the proposal rather than wirelines.	Since this is an outline application and detail of materials, fenestration, façade treatments etc would be reserved, the assessment of townscape and visual effects has been based on wirelines showing the massing of the Maximum Heights Parameter Plan. However illustrative rendered versions of four of the more sensitive long-distance views have been prepared to illustrate how the design and materials can mitigate the effect of the massing (see Technical Appendix 1.6).
LBH Principle Strategic Planner Kiri Shuttleworth Pre-application consultation response in email dated 1 April 2020.	Wireline AVRs would not be acceptable to support an application. Rendered views need to be provided.	See above.

## Assessment Scope

1.8 This assessment is based on the methodology set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA3)<sup>15</sup> written in collaboration between the

<sup>15</sup> Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment (Third Edition)*

Landscape Institute (LI) and the Institute of Environmental Management and Assessment (IEMA), and An Approach to Landscape Character Assessment<sup>16</sup> published by Natural England.

## Technical Scope

1.9 The technical scope of the assessment has considered the potential for the proposed development to affect the townscape character of the site, the character and quality of townscape in the surrounding study area; and its visual amenity from visual receptors, through the assessment of likely changes to verified representative views.

- Demolition and Construction effects: The assessment has considered the demolition and construction works and associated visibility of machinery, cranes and other equipment used in site clearance and construction works; the part construction of the proposed development; and the hoarding and site lighting which would be visible at street level. These are considered in the absence of long term mitigation measures.
- Completed Development effects: The assessment has considered the following potential impacts and associated likely effects of the completed proposed development:
  - Impacts on the townscape character and quality on-site and within the surrounding study area;
  - Visibility of the proposed development within local townscape representative views and effects on the associated visual receptors; and
  - Visibility of the proposed development within wider townscape representative views from locations such as Osterley Park, Syon Park, Boston Manor and Royal Botanical Gardens Kew and effects on the associated visual receptors.

## Spatial Scope

1.10 To ensure a thorough and robust assessment of the effect of development on townscape and visual receptors, it is necessary to define an appropriate study area. The study area for this assessment has been defined by manually establishing a broad Zone of Theoretical Visibility (ZTV), which has been identified using desktop studies of mapping information and fieldwork to interpret views towards the site.

1.11 The study area includes the townscape and visual receptors within a 2.5 km radius from the centre of the site (see Figure 1.1). The assessment of the effects of the proposed development on the identified townscape and visual receptors has been informed by a series of AVRs from representative view locations within the study area, including where relevant, longer distance views from further afield.

<sup>16</sup> Natural England (2014) *An Approach to Landscape Character Assessment*



Figure 1.1

## Temporal Scope

- 1.12 The assessment has considered impacts arising during the demolition and construction stage which are expected to be temporary and short to medium-term (approximately 10 years) in nature (2025 to 2035 years) and from the completed proposed development which would be expected to be permanent and long-term in nature.
- 1.13 The assessment has been undertaken against the existing baseline. Consideration has also been given to inter-project effects with cumulative schemes.

## Baseline Characterisation Method

### Desk Study

- 1.14 In order to establish baseline townscape and visual conditions in the study area, relevant data was reviewed and assessed. Data was obtained from the following sources:
- Ordnance Survey (OS) mapping;
  - Relevant view-related planning policy and guidance; and
  - Aerial Photography (Google Earth).

### Field Study

- 1.15 Field studies were undertaken by urban design specialists from Arc in March, July and September 2019, and January 2020. Features of the site and its surrounding study area were identified along with the visual receptors established in the desk study. The field studies included a comprehensive review of the study area and capturing field photography.

## Assessment Method

### Methodology

- 1.16 The methodology used in this assessment addresses two interlinked elements: landscape, as a resource; and visual amenity, including views. This follows the guidance in GLVIA3 which states that the effects of both elements must be addressed within the Townscape and Visual Impact Assessment (TVIA). The ELC defines landscape as including villages, towns and cities and the GLVIA3 states that 'townscape' refers to areas where the built environment is dominant.
- 1.17 For the assessment of townscape and visual effects, in common with any assessment of environmental effects, it is important that a structured and consistent approach is used; the methodology for the TVIA is provided in full at Technical Appendix 1.2: Townscape and Visual Impact Assessment Methodology of this Volume.
- 1.18 The two fundamental considerations in the TVIA are the sensitivity of the identified townscape character areas and visual receptors, and the magnitude of impact that these receptors are likely to experience as a result of the proposed development during the demolition and construction

stage and at year 1 of the operation of the completed proposed development, and the combined effect of the proposed development with the identified cumulative schemes.

- 1.19 The assessment of the effects of the proposed development on the identified townscape and visual receptors has been informed by the AVRs (provided in Technical Appendix 1.3: Visual Impact Assessment of this Volume).

### Demolition and Construction Stage

- 1.20 Demolition and construction stage effects are considered to be temporary and the townscape character and on the visual receptor's representative views have been assessed based on professional judgement without illustration in the supporting AVRs.

### Completed Development Stage

- 1.21 In order to inform the assessment of the effects of the completed proposed development on townscape character and on the visual receptor's representative views, a series of AVRs have been prepared. The following have been prepared for each representative view:
- Existing – the representative view as it currently exists; and
  - Proposed – the representative view with the proposed development's maximum parameters inserted as a wireline.

### Cumulative Stage

- 1.22 The cumulative assessment has considered the inter-project effects of the proposed development on townscape character and visual receptor's representative views when considered in addition to the identified cumulative schemes. To inform the assessment of cumulative effects, representative views have been prepared with the proposed development inserted as a wireline and the identified cumulative schemes shown also as wirelines.

## Assessment Criteria

- 1.23 The criteria used to assess if an effect is significant or not are set out in subsequent sub-sections. This has been determined by consideration of the sensitivity of the receptor, magnitude of impact, duration of the effect, geographical extent of the effect and application of professional judgement.
- 1.24 The sensitivity of each receptor has been established through the combined consideration of their value and susceptibility; the magnitude of impact has been informed by judgements on the size and extent of change resulting from the proposed development.

### Receptor Sensitivity /Value Criteria

- 1.25 The sensitivity of the townscape receptors and visual receptor representative views has been determined through combining their value (determined at the baseline stage of the assessment) with their susceptibility to change. This is illustrated in Table 1.2. Sensitivity has been classified as low, medium or high.

1.26 Technical Appendix 1.2: Townscape and Visual Impact Assessment Methodology provides criteria for defining the townscape receptors and visual receptor representative views value and susceptibility to change.

**Table 1.2: Sensitivity of Townscape Receptors and Visual Receptor Representative Views**

Susceptibility to Change	Value				
	Exceptional	High	Medium	Low	Poor
High	High	High	Medium to/or High	Medium	Low to/or Medium
Medium	Medium to/or High	Medium to/or High	Medium	Low to/or Medium	Low
Low	Medium	Medium	Low to/or Medium	Low	Low

### Impact Magnitude Criteria

1.27 The magnitude of impact has been classified as very low or non-existent, low, medium or high, in line with the criteria set out in Table 1.3.

**Table 1.3: Impact Magnitude Criteria**

Magnitude of Impact	Criteria
Very Low/None	<ul style="list-style-type: none"> <li>Where the proposed development (or works to facilitate it) would result in a very minor loss or alteration of one or more of the key elements that make up the character of the baseline townscape or view from a particular location.</li> <li>The introduction of elements that may not be uncharacteristic in the particular context.</li> <li>Where the proposed development occurs within other character areas or types and their introduction by virtue of distance would have limited or no effect on the baseline character area.</li> <li>Where the proposed development would only be seen from a distance and be imperceptible within the context of the wider view.</li> </ul>
Low	<ul style="list-style-type: none"> <li>Where the proposed development (or works to facilitate them) would result in minor loss or alteration of one or more of the key elements</li> </ul>

**Table 1.3: Impact Magnitude Criteria**

	<p>that make up the character of the baseline townscape or make up the view from a particular location.</p> <ul style="list-style-type: none"> <li>Where the introduction of elements would not generally be considered uncharacteristic in the particular setting and/or context.</li> <li>Where the proposed development occurs within other character areas or types and their introduction by virtue of distance would have limited or no effect on the baseline character area or view.</li> <li>Minor loss of or alteration to one or more key elements / features / characteristics of the baseline. The duration of this effect may be temporary and reversible</li> </ul>
Medium	<ul style="list-style-type: none"> <li>Where the proposed development (or works to facilitate them) would result in the partial loss or alteration of one or more of the key elements that make up the character of the baseline townscape or make up the view from a particular location.</li> <li>Where the introduction of new features may be prominent but not necessarily wholly uncharacteristic in the particular context.</li> <li>Where the proposed development would be largely experienced within the townscape type/character area within which they would sit.</li> <li>Where the proposed development would be largely seen from further afield or as only part of a view.</li> <li>Partial loss of or alteration to one or more key elements / features / characteristics of the baseline. The duration of this effect may be semi-permanent and partially reversible</li> </ul>
High	<ul style="list-style-type: none"> <li>Where the proposed development (or works to facilitate them) would result in the total loss or major alteration of the elements that make up the character of the baseline townscape or make up the view from a particular location.</li> <li>Where the introduction of elements is considered to be wholly uncharacteristic in the particular setting and/or context.</li> <li>Where the proposed development would be experienced over a large scale and/or townscape type/character area or would be visible over a large scale and / or at close range.</li> <li>Loss of or major alteration to key elements / features / characteristics of the baseline. The duration of this effect may be permanent and non-reversible</li> </ul>

## Scale of Effect Criteria

1.28 Table 1.4 illustrates the typical relationship between the sensitivity of the receptor and the magnitude of impact, resulting in a scale of effect.

Magnitude	Sensitivity of Receptors		
	Low	Medium	High
<b>Very Low / None</b>	None	None or Negligible	None or Negligible or Minor
<b>Low</b>	Negligible or Minor	Minor to Moderate	Moderate
<b>Medium</b>	Minor to Moderate	Moderate	Moderate to Major
<b>High</b>	Moderate	Moderate to Major	Major

1.29 In determining the significance of reported effects, consideration has been given to the type of effect i.e. direct, indirect or secondary, the geographical extent of the effect and the duration of the effect.

1.30 In respect of geographical extent, 'local' effects are those affecting neighbouring receptors of the proposed development, whilst effects upon receptors within the wider borough are considered to be at a 'district' level. 'Sub-regional' effects are those affecting adjoining boroughs, whilst effects upon Greater London are considered to be at a 'regional' level. Effects upon different parts of the country, or England as a whole, are considered to be at the 'national' level.

1.31 In respect of duration of effects, temporary effects are those considered to be either short (up to five year) to medium (up to ten years) term or permanent (More than 10 years). Short or medium term effects are associated with the demolition and construction works and long-term effects are associated with the completed development.

1.32 Based on professional judgement, moderate and major effects are considered significant in EIA terms.

## Nature of Effect

1.33 The nature of the effect has been described as either adverse, neutral or beneficial as follows:

- Beneficial – An advantageous effect to a receptor;
- Neutral – An effect that on balance, is equally beneficial and adverse to a receptor; or
- Adverse – A detrimental effect to a receptor.

1.34 These judgements take into account whether the proposed development:

- conforms with the pattern, scale, mass, grain and historic features of the identified townscape character;
- creates a loss or restoration of key townscape features;
- contributes to the identified townscape character;
- affects identified townscape receptors and representative viewpoints; and
- accords with or contravenes relevant townscape or view related planning policy or guidelines.

## Assumptions and Limitations

1.35 The assessment of effects has been undertaken on the basis of the information supplied on the construction period, the design of the proposed development and the anticipated completion date of 2035. Further details can be found in Chapter 4: Proposed Development Description and Chapter 5: Demolition and Construction of ES Volume 1.

1.36 In considering the effects of the completed proposed development upon the identified townscape character area receptors and visual receptors representative views, the assessment has been based on the drawings and information that comprise the application and are submitted for approval, including the design principles within the Design Code. This approach allows for a balanced assessment that considers all the relevant material and allows for judgements to be made on design quality and associated mitigating effects.

1.37 Excepting views 2, 4, 18, 24 and 25, the photography on which the representative view visualisations are based, set out in Technical Appendix 1.3 of this Volume, were taken when intervening trees were bare of leaves. The Visual Impact Assessment, set out in Technical Appendix 1.3, does not attempt to predict the visual effects of seasonal changes throughout the year but is based on the worst-case scenario in terms of the views from the identified visual receptor's viewpoints, i.e. in winter months when deciduous trees have lost their leaves and visibility is generally increased.

1.38 Entry was not been made to individual properties, but where relevant, an assumption has been made about the nature of the potential view by visiting adjoining areas of public access such as roads, footpaths or publicly accessible open space.

## Baseline Conditions

### Existing Baseline

#### Townscape

1.39 This section describes the components that make up the existing townscape and combine to create the character of the study area.

## Site

- 1.40 The site, which is irregular in shape, measures 5.45 ha in area and is located north of the A4 Great West Road at the corner of Syon Lane (B545) and Grant Way, in Isleworth, TW7 5NZ. It is currently occupied by a Tesco store and petrol filling station (PFS), with an associated large surface parking area. The Tesco store occupies a large industrial style brick-faced building. The area of land to the north of the Tesco store is known as the Water Gardens, comprising amenity grassland, a pond, shrubs and trees. A small portion of the site is situated to the west of MacFarlane Lane; it is fenced off and comprises areas of hardstanding, bare ground, ruderal vegetation and scattered trees. Vehicle access is via a roundabout off Syon Lane with pedestrian access from Grant Way and Syon Lane.
- 1.41 The site is bound to the:
- north-west by MacFarlane Lane, beyond which is Goals Gillette Corner Sportfields (including Goals Gillette Corner Football Academy football pitches and Sky's football area), the site of the proposed Bolder Academy and Wyke Green Golf Course;
  - north-east by the Sky Isleworth Campus comprising 11 large scale headquarter, studio and playout centre buildings, which is not publicly accessible;
  - east by Grant Way, beyond which lies a small area of amenity space, the Sky Isleworth Campus and the West Cross Industrial Estate, including the Gillette Building;
  - south by Syon Lane (B454), beyond which are two storey semi-detached houses and a two storey apartment block; and
  - west by MacFarlane Lane and two storey semi-detached houses.
- 1.42 To accompany the planning application, a detailed arboricultural survey of the trees within and adjoining the site was completed in August 2019 by tree:fabrik in accordance with BS 5837:2012. The survey contains details of 177 individual trees and 13 tree groups; the relative quality of the existing tree cover was assessed by reference to grading categories.
- 1.43 The principal arboricultural features within the site are the trees within the Water Gardens; the linear group of trees located along the boundary with Syon Lane; and two Silver Maples (T25 & T26) which are 'B1' category and a mature English Oak (T81) which is 'A' category, located to the south and west boundaries respectively. The Silver Maples and the English Oak pre-date the existing landscaping and are prominent features within the local and wider landscape. In total 42 trees are present on the site.
- 1.44 In addition to the trees, there are occasional areas of evergreen shrub planting between the parking bays, as well as areas of shrub planting on the boundaries. The trees on the southern boundary, which fronts on to Syon Lane, are within a 20 m wide grassed verge.
- 1.45 The topography of the site is relatively uniform, varying from 23.1 m Above Ordnance Datum (m AOD) at the eastern boundary to 24.8 m AOD at the western-most extent.
- 1.46 A small part of the site to the north of Macfarlane Lane falls within the boundary of the Osterley Park Conservation Area; there are no other designated or non-designated heritage assets within the site boundary.

## Surrounding Context

### Landform

- 1.47 Within the wider study area, the majority of the area is generally low lying at around 25.0 m AOD, sloping gradually towards the River Thames which is located to the south-east of the site, as shown in Figure 1.2.

### Land Use

- 1.48 Although the study area comprises primarily residential uses and the built form generally reflects this in scale, footprint and height, within the Great West Corridor (GWC) the land use is more varied, with big box/industrial, office parks side by side with post-war housing (see Figure 1.3).

### Height and Massing

- 1.49 In general, built form to the north, south and west of the study area is not particularly tall. Taller buildings and structures are concentrated to the east along the M4 and A4 corridors; many have been designed to be visible from these important transport corridors. The imposing skyline they create contributes to the existing character of the area. Some of the area's tall buildings and local landmarks date back to the early development of the GWC, such as the former Gillette Factory's clock tower, which is located approximately 120 m to the east of the site and is identified as a landmark in LBH's Urban Context and Character Study<sup>i</sup>.
- 1.50 The Sky Isleworth Campus to the north-east of the site comprises a variety of building footprints ranging from large studio spaces to smaller office blocks. The height of buildings varies between 7 and 13 m; the associated wind turbine is the tallest element within the campus and is a local landmark.
- 1.51 The West Cross Industrial Park contains a number of light industrial buildings aligned along Harlequin Avenue and Shield Drive. The built form in this area is varied with a range of buildings of differing ages and scales ranging from 1-2 storey brick built inter-war offices and warehouses to larger scale more modern sheds which are several storeys taller.

### Heritage Assets

- 1.52 Heritage assets within the wider study area include nine conservation areas which fall either wholly or partially within it; seven within LBH and two within the London Borough of Richmond Upon Thames (LBRuT) (see Figure 1.4). The Royal Botanic Gardens, Kew which is a World Heritage Site (WHS) and contains Grade I listed buildings, and the Buffer to the WHS fall partially within the southern extent of the study area.
- 1.53 This chapter does not assess whether harm may arise as a result of the proposed development to the significance of these heritage assets (see Chapter 2: Built Heritage of this Volume); however, the heritage assets have informed the assessment of the value of the representative views and the townscape receptors.



Figure 1.2



Figure 1.3

## Open Space

- 1.54 The study area includes a number of accessible open space areas which are associated with heritage assets, as illustrated in Figure 1.4. These include:
- Syon Park (Registered Historic Park and Garden) Syon House's garden is publicly accessible during the summer upon payment of a set fee and approximately 900 m from the site's boundary;
  - Osterley Park (Registered Historic Park and Garden) The area of the park that surrounds Osterley House is accessible between 7am and 7.30pm throughout the year and is located some 750 m from the site's boundary;
  - Boston Manor Park is open throughout the year and approximately 635 m from the site's boundary; and
  - Royal Botanic Gardens at Kew (Registered Historic Park and Garden and WHS) is publicly accessible upon payment of a set fee and lies approximately 1.75 km from the site's boundary, to the south of the River Thames.
- 1.55 Excepting Boston Manor Park which is owned by LBH, all of these open spaces are privately owned but publicly accessible.
- 1.56 Additional areas of open space within the study area comprise playing fields, such as the Goals Gillette Corner Sportsfield, and incidental areas of open space associated with residential areas and educational facilities.

## Movement

- 1.57 The townscape assessment study area is crossed by two primary, busy vehicular routes, namely the M4 motorway and the A4 Great West Road. Secondary and tertiary routes, accessed from the primary roads, provide access to the surrounding residential and commercial areas.
- 1.58 The study area is crossed in its southern most extent by the River Thames, which marks the boundary between LBH and the LBRuT.
- 1.59 Approximately 430 m to the south of the site is Syon Lane railway station and the overground railway line.
- 1.60 The Capital Ring walking route crosses the study area from north to south, following the River Brent before passing through Syon Park and joining the Thames Path on the northern bank of the River Thames.

## Baseline Townscape Character

- 1.61 The GLA London Plan Character and Context SPG sets out how to assess character areas. It builds on Policy '7.4 - Local Character' of the London Plan and sets out the following four principles:
- Character is all around us and everywhere has a distinctive character;
  - Character is about people and communities;
  - Places are connected and overlap – boundaries and transitions are important; and
  - The character of a place is a dynamic concept.

- 1.62 These principles have been considered in assessing the townscape character of the site and the study area.
- 1.63 The site is not covered by any planning policy designations relating to townscape value and, excepting the few higher quality trees identified within the tree survey, there are no features within its boundary which are considered to be of value.
- 1.64 Published character assessments have been consulted to provide an overview of the wider area; field surveys have been used to establish the finer grain of the existing townscape character within the study area.
- 1.65 At a national level, the study area falls within National Character Area Profile: 112 Inner London<sup>17</sup>, which is described as:
- "Predominantly urban, the Inner London National Character Area (NCA) lies at the centre of the Thames Basin on a broad flood plain which rises in gentle terraces, providing panoramic views of London's skyline from the clay plateaux and ridges in the north at the border with the Northern Thames Basin. The NCA is steeped in both historical and contemporary culture; it is the centre of UK Government and a major international hub for finance, business, tourism, transport and recreation. Owing to its urban nature, Inner London relies heavily on ecosystem services provided by the surrounding NCAs, such as flood alleviation, air temperature regulation and recreational services."
- 1.66 At a regional level the London's Natural Signatures: The London Landscape Framework<sup>18</sup> locates the site at the eastern-most extent of Landscape Area 12 Hounslow Gravels, described as:
- "An area characterised by recent industrial and interwar suburban development on flat land. Built development is interspersed by corridors and patches of open space along tributary streams."
- 1.67 Both the national and regional assessments cover a wide area and, whilst they provide useful background and context to the area beyond the study area, their scale is such that it is not considered that there would be any significant effects resulting from the proposed development. No further reference has therefore been made to them within this assessment.
- 1.68 At the local level, LBH's Urban Context and Character Study establishes seven broad urban types. Figure 1.5 identifies those which fall within the study area and Table 1.5 summarises their key characteristics and location in relation to the site. Where the study area falls within London Borough of Ealing (LBE) or LBRuT considerations has been given to the areas characteristics in order to establish the Urban Type.

<sup>17</sup> Natural England (2013) (web based) *National Character Area Profile: 112 Inner London (NE476)*

<sup>18</sup> Natural England (2011) *London's Natural Signatures: The London Landscape Framework*

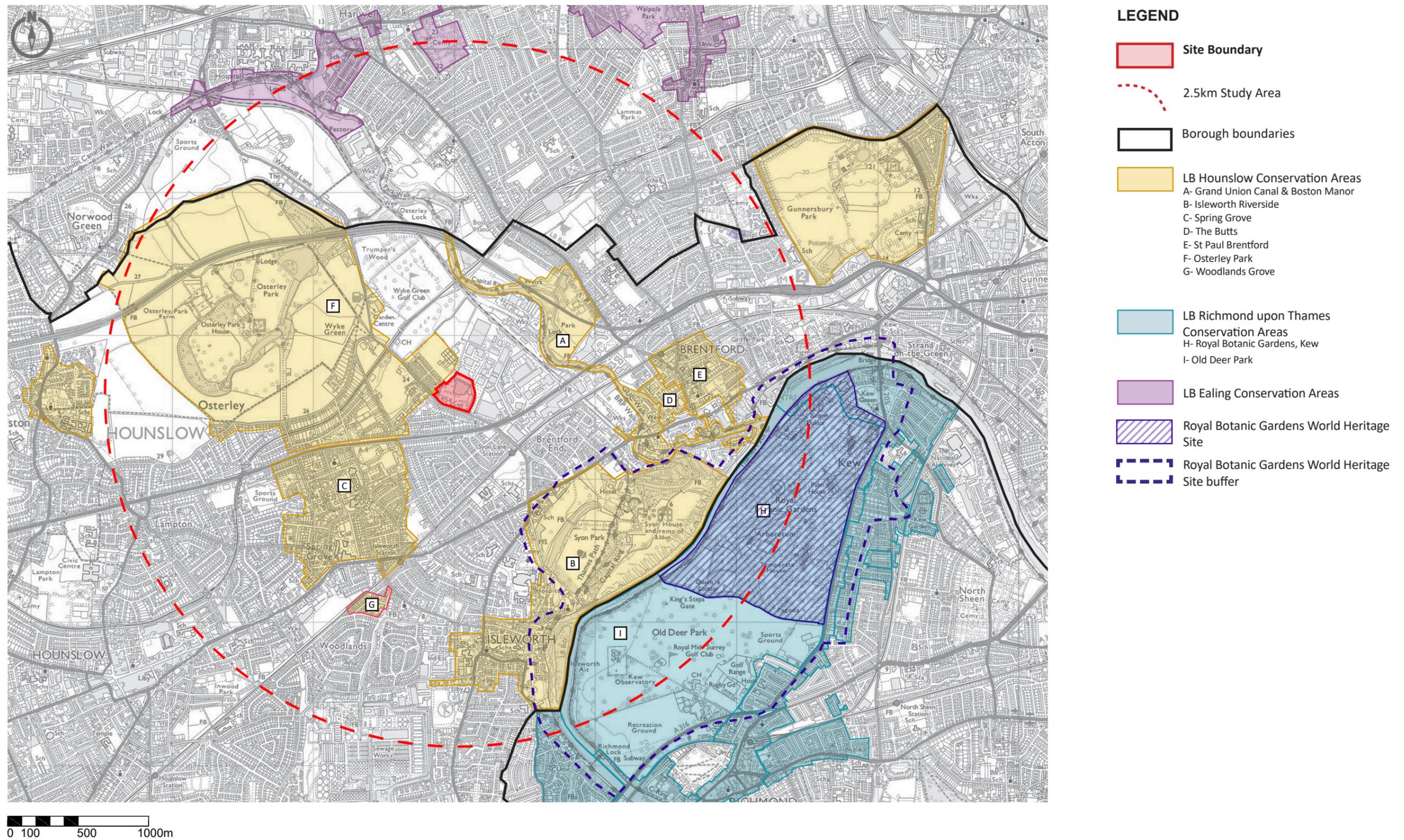


Figure 1.4

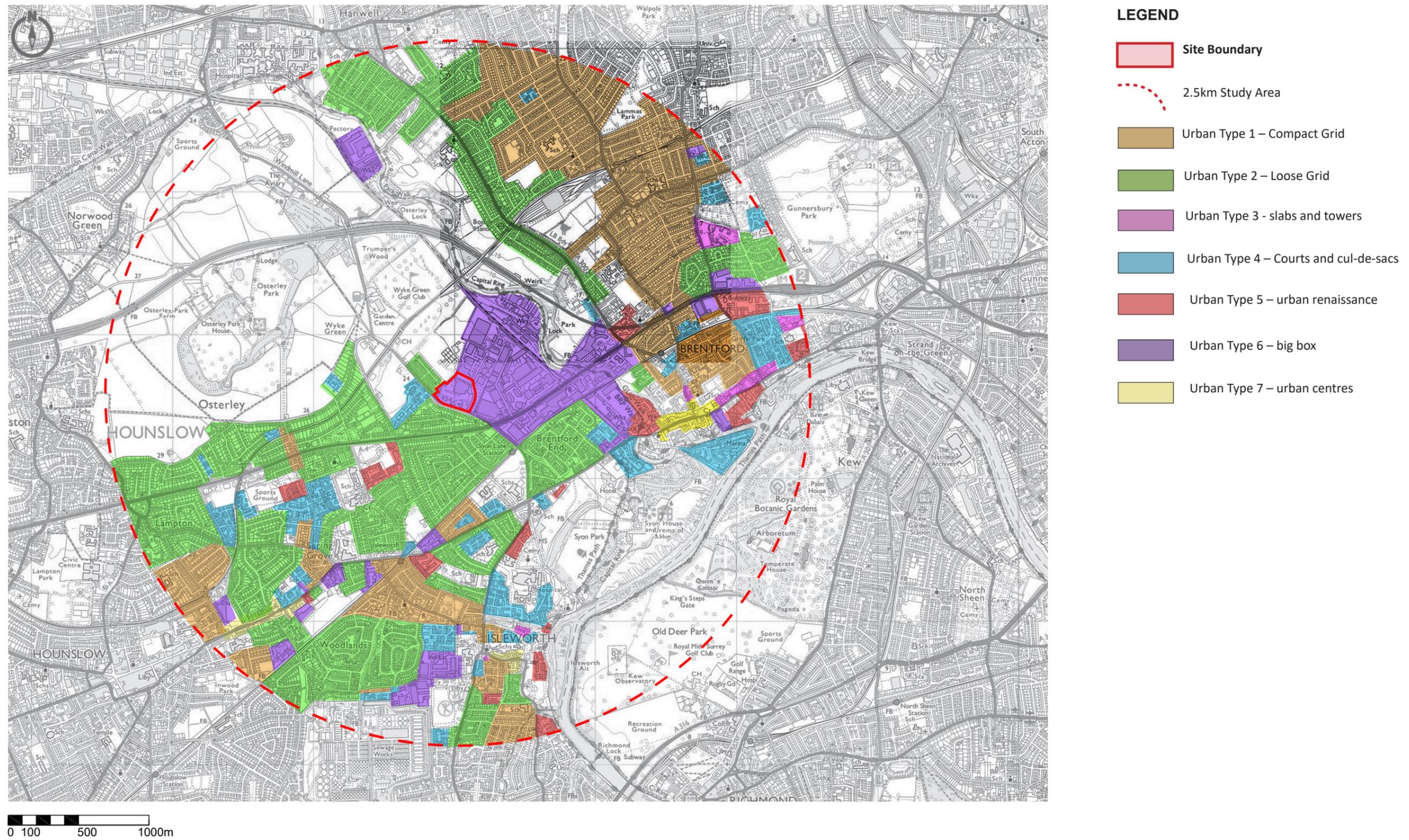


Figure 1.5

**Table 1.5: Hounslow Urban Types Key Characteristics**

Urban Type	Characteristics (summarised LBH Urban Context and Character Study)	Location
Urban Type 1 – Compact Grid	<ul style="list-style-type: none"> <li>• Predominantly dating from the late 19<sup>th</sup> century and pre-World War One periods with some recent examples.</li> <li>• Compact grid layout ranges from clearly laid out streets in rigid grid patterns to loose organic grids.</li> <li>• Streets typically connect together.</li> <li>• Street lengths and blocks size and shape vary resulting in a variety of grid layouts.</li> <li>• Predominantly residential buildings include terraces and semi-detached properties - overall medium to high density (60 - 100dph).</li> <li>• Low rise - predominantly two to three storeys in height.</li> <li>• Small scale mixed use - often found on corner plots or on main routes.</li> <li>• Minimal building setbacks with well-defined front boundaries – often defined with low brick walls.</li> <li>• Chiefly brick facades and chimneys.</li> <li>• The layout typically lacks civic and amenity spaces.</li> </ul>	<p>This urban type is typically found on the edge of historic town or local centres such as Hounslow, Isleworth or South Ealing. They are typically found on the edge of the study area to the north-east and south-west. Small areas also exist at historic transport routes such as Thornbury Road.</p>
Urban Type 2 – Loose Grid	<ul style="list-style-type: none"> <li>• Predominantly from the interwar and early postwar period - late 1910s to late 1940s and early 1950s.</li> <li>• Large areas of LBH contain variations of this type resulting in it being abundant within the study area.</li> <li>• Can also be found across outer London, especially outer West London, known as Metroland due its growth post-expansion of the London Underground.</li> <li>• Mostly comprises large, irregular blocks on a network of wide, curving streets with a mixture of associated closes and cul-de-sacs.</li> </ul>	<p>This predominant urban type found throughout the study area and can be found to the immediate south and west of the site.</p>

**Table 1.5: Hounslow Urban Types Key Characteristics**

Urban Type	Characteristics (summarised LBH Urban Context and Character Study)	Location
	<ul style="list-style-type: none"> <li>• Some blocks are more regular and straight, others are more curving and organic.</li> <li>• Characterised by their low density, consisting of large plots with generous front and back gardens.</li> <li>• Consists of largely detached, semi-detached or short terraces and predominantly two storeys in height.</li> <li>• Characterise suburban character - a generosity of space, large back gardens, deep front gardens, space for your car, space to extend your house, uniform and conservative in style, detailing.</li> </ul>	
Urban Types 3 - Slabs and Towers	<ul style="list-style-type: none"> <li>• Limited examples of this type within LBH but these few have significant impact due to their structure, scale and height.</li> <li>• Freestanding buildings set within open space which consists of large car parking areas, grassed areas, mature trees and shrub planting.</li> <li>• Mixture of high-rise towers (point blocks) and lower-rise, linear slab blocks.</li> <li>• Typically medium to high density, with a mix of housing types, commonly flats, maisonettes and terraced houses.</li> <li>• Highly visible and prominent on the skyline</li> <li>• Segregated movement of internal access roads and pedestrian footpaths.</li> </ul>	<p>Small areas of this urban type can be found to the east and south of the study area within Isleworth and Brentford.</p>
Urban Type 4 – Courts and Cul-de-Sacs	<ul style="list-style-type: none"> <li>• Examples are predominantly from between the 1960s to the 1990s</li> <li>• The types are characterised by a main distributor or loop road with a series of access roads forming semi-enclosed courts or cul-de-sacs, creating a large 'superblock' layout.</li> <li>• Traffic separation principles ensure vehicles and pedestrians are often segregated especially in the early Radburn-esque examples</li> </ul>	<p>Small areas of this urban type can be found within the study area with the closest being Field Lane situated 500 m to the east and Stags Way 500 m to the west</p>

Table 1.5: Hounslow Urban Types Key Characteristics		
Urban Type	Characteristics (summarised LBH Urban Context and Character Study)	Location
	<ul style="list-style-type: none"> <li>Lower-rise buildings are arranged in groups around a semi-enclosed court or cul-de-sac, sometimes inward facing, sometimes outward facing.</li> <li>Predominantly medium density but can vary greatly depending on dominant building type - 1980s examples can be very low density (range 30-50dph).</li> <li>Building types can be very mixed with apartment blocks, short terraces and semi-detached properties.</li> <li>Car access and parking is integral element of the design, with ease and proximity a key design feature.</li> <li>Characterised by an insular, self-contained feel, resulting from its lack of through-movement and wider connectivity with the surrounding townscape.</li> </ul>	
Urban Type 5 – Urban Renaissance	<ul style="list-style-type: none"> <li>Almost exclusively 1990s to present day.</li> <li>Typical found off main roads and reflects the early 21<sup>st</sup> Century type of planning and urban design arisen out of the Urban Task Force Report: Towards an Urban Renaissance which encourages reuse of brownfield land, higher densities and mixed use type development.</li> <li>Mostly comprises a return to the perimeter block with buildings fronting onto and enclosing streets and public space with strong axes.</li> <li>Blocks tend to be smaller, more square in shape and respond to the underlying landscape in comparison to the compact grid urban type 1 which tended to have longer rectangular blocks.</li> <li>Higher densities achieved (up to 250 dwellings per hectare (dph) through compact design principles.</li> <li>Provision of a mix of housing types including flats, maisonettes, townhouses, mews and</li> </ul>	Small areas of this urban type can be found within the study area with the closest being Union Lane situated 550 m to the south and Academy Place 900 m to the west

Table 1.5: Hounslow Urban Types Key Characteristics		
Urban Type	Characteristics (summarised LBH Urban Context and Character Study)	Location
	<p>terraces, reflecting the diversity of housing need.</p> <ul style="list-style-type: none"> <li>Predominantly mixed in tenure with private and affordable units integrated into one scheme.</li> <li>Built almost exclusively by private developers or housing associations.</li> </ul>	
Urban Type 6 – Big Box	<ul style="list-style-type: none"> <li>Predominantly 1980s to present day.</li> <li>Located close to major A roads and across the borough but more common in the west and along the Golden Mile section of the GWR.</li> <li>Self-contained pods with one or two access roads (little to no through movement).</li> <li>Large footprint, rectangular, freestanding buildings, also known as super sheds and large single-storey buildings.</li> <li>Buildings surrounded by car parking and/or hard and soft landscaping.</li> <li>4-10 m building heights - often with double height ceilings.</li> </ul>	The site falls within this urban type along with the immediate area to the south and east. Smaller areas of this urban type can also be found pepper potted within the study area
Urban Type 7 – Urban Centres	<ul style="list-style-type: none"> <li>Mixed land use areas with high levels of local accessibility, along with a mix of building types and ages reflecting their historic origin.</li> <li>Centres spatially arranged along high streets, historic cores and at key road junctions</li> <li>Streets and spaces addressed by buildings with ground floor non-residential uses.</li> <li>Residential or commercial uses often stacked above ground floor retail.</li> </ul>	This urban type can be found in the centre of Brentford, Isleworth and Hounslow, to the southeast, south and southwest respectively.

### Townscape Character Areas (TCAs)

1.69 This assessment has sub-divided the study area into seven townscape character areas (TCAs) (see Figure 1.6) to better understand the finer grain of the receiving townscape and identify potentially sensitive landscape receptors. This has been informed by The GLA Shaping Neighbourhoods: Character and Context SPG (2014), LBH's GWC Masterplan and Capacity Study and the LBH Urban Context and Character Study.

1.70 The key features of the TCAs and an assessment of their value are summarised in Table 1.6. The site itself falls within TCA 2 Osterley & Spring Grove non-residential.

Table 1.6: Townscape Character Areas		
Townscape Character Areas	Characteristics	Value
TCA1 – GWR Corridor	<ul style="list-style-type: none"> <li>Major transport corridor, characterised by heavy vehicular use and an open aspect reinforced by relatively sparse vegetation to each side.</li> <li>The road comprises six lanes, with cycle lanes on both sides, wider verges and pavements and a central reservation.</li> <li>Bisects the study area on an east/west axis.</li> <li>Along the eastern extent, almost entirely non-residential frontages and an area of coarse urban grain, constituting large commercial plots occupied by predominately low rise, commercial buildings.</li> <li>Limited sense of enclosure due to the set-back for parking to the front of commercial buildings.</li> <li>The western extent is fronted by interwar residential semis, the majority with paved front gardens to accommodate off-street parking.</li> <li>The focal point for the junction of the GWR and Syon Lane is the Homebase tower.</li> <li>Includes several listed Art Deco buildings, including the former Gillette Factory; part of the former Coty Factory; Westlink House; 991 GWR; and the National Westminster Bank.</li> </ul>	Poor
TCA2 – Osterley & Spring Grove non-residential	<ul style="list-style-type: none"> <li>Contains the site - a predominantly commercial and industrial townscape.</li> <li>A coarse-grain townscape characterised by large-footprint buildings - 'big box commercial landscape'.</li> <li>Includes the post-modern Sky campus and the Goals Gillette Corner Sportsfield; the pavilion is listed.</li> <li>The majority of buildings to the northern edge of the GWR post-date 1980.</li> </ul>	Low

Table 1.6: Townscape Character Areas		
Townscape Character Areas	Characteristics	Value
TCA3 – Historic Brentford and Isleworth	<ul style="list-style-type: none"> <li>Compact urban grid.</li> <li>Bounded by the tidal River Thames to the south and east.</li> <li>Predominantly residential with historic cores.</li> <li>Waterside character in Brentford is shaped by its canal and riverside buildings, remaining active boatyards and established residential moorings.</li> <li>Residential types include 2 storey late 19<sup>th</sup> century terraces, early interwar garden suburbs, 1970s tower blocks and 2000s urban renaissance mid-rise apartments.</li> <li>In Brentford the TCA includes The Butts and St Pauls Conservation Areas and in Isleworth, the Isleworth Riverside Conservation Area.</li> <li>Includes over 75 listed buildings.</li> <li>Isleworth is characterised by a high quality, low-rise (2-4 storeys), compact, fine-grain townscape with a wide variety of building styles, including Georgian, Victorian and 20th century architecture.</li> </ul>	Medium to High
TCA4 – Brentford and South Ealing residential	<ul style="list-style-type: none"> <li>Primarily residential.</li> <li>Low-rise mixture of early interwar ribbon development estate; two-storey semis, Victorian and Edwardian two storey long terraces; and postwar estate of local authority social housing.</li> <li>Contains two Areas of Special Character as identified in the LBH Context and Character Study.</li> <li>On-street parking.</li> <li>Includes approximately 30 listed buildings.</li> </ul>	Low
TCA5 – Osterley, Spring Grove and Isleworth residential	<ul style="list-style-type: none"> <li>Low-rise residential development running east-west alongside and north of the GWR.</li> <li>Predominantly interwar ribbon development.</li> <li>The area is exclusively residential, with the southernmost properties facing the GWR.</li> <li>Interwar residential estates, including three Areas of Special Character as identified in the LBH Context and Character Study, the Spring Grove Conservation Area and</li> </ul>	Low to Medium

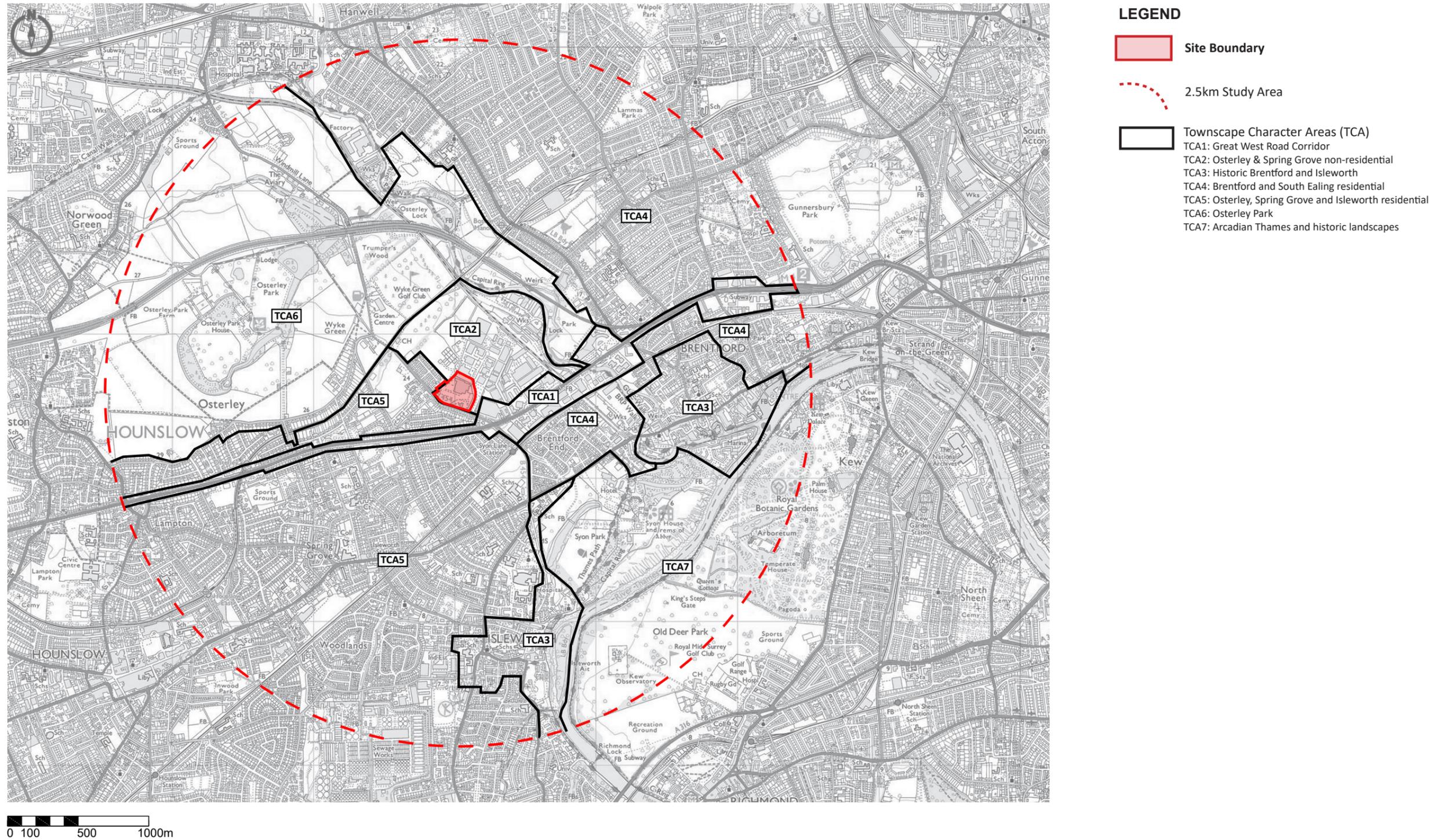


Figure 1.6

<b>Townscape Character Areas</b>	<b>Characteristics</b>	<b>Value</b>
	<p>the southern extent of the Osterley Grove Conservation Area.</p> <ul style="list-style-type: none"> <li>• Predominantly two-storey, semi-detached, with some short terraces.</li> <li>• Considerable uniformity of scale, typical of interwar ribbon development in its density, layout, and building type.</li> <li>• Includes playing fields and sports pitches, educational and religious establishments.</li> <li>• Despite being the largest TCA in the study area, includes approximately only 25 listed buildings.</li> </ul>	
TCA6 - Osterley Park	<ul style="list-style-type: none"> <li>• Listed historic mansion (Grade I) surrounded by gardens, park and farmland (Grade II* Registered Park and Garden); one of the last surviving country estates in London.</li> <li>• One of the largest open spaces in west London and designated as Metropolitan Open Land.</li> <li>• Despite being predominantly parkland and open space, the TCA includes over a dozen listed buildings.</li> <li>• Marred by the M4 motorway, which crosses the northern half of it, resulting in high levels of traffic noise and creating a barrier to north-south movement.</li> <li>• Formal recreation uses, including River Brent and Brent River Park to the east.</li> </ul>	High
TCA7 – Arcadian Thames and Historic Landscapes	<ul style="list-style-type: none"> <li>• 18th century parkland landscape with villas, palaces and riverside villages which includes Syon Park, the Royal Botanic Gardens at Kew and the Old Deer Park</li> <li>• An historical landscape continuum between the two banks and across the land from Richmond to Kew – important visual links across the river.</li> <li>• The gravel towpath from Richmond to Kew has a remote, rural character; the river is tidal.</li> <li>• Includes Isleworth Ait, Brentford Ait and Lots Ait, which are wooded islands.</li> </ul>	Exceptional

<b>Townscape Character Areas</b>	<b>Characteristics</b>	<b>Value</b>
	<ul style="list-style-type: none"> <li>• Includes Brentford Lock and Brentford Dock Marina; at Brentford, the waterfront is a mixture of regeneration and former industrial areas, which though in need of regeneration, still retain significant elements of their dockland past.</li> </ul>	

### Visual Receptors

- 1.71 The assessment of the visibility of the site was undertaken in two stages. The first was to manually establish the extent of the site’s ZTV and identify visual receptor groups; these are defined in GLVIA3 as “people who will be affected by changes in views or visual amenity at different places”. Areas of public open space, such as Osterley Park, Boston Manor Park, Syon Park and the Royal Botanic Gardens, along with the areas of open space at Goals Gillette Corner Sportsfield and St Pauls Recreation Ground, as well as roads and footpaths, were visited to determine the visibility of the site.
- 1.72 The field studies identified that due to the low-rise nature of the built form currently present on the site, the relatively level topography within the study area, the lack of any taller features such as communication masts on the site and the quantum of intervening visual barriers, the existing ZTV of the site is limited.
- 1.73 Where there are views of the site, these are limited to short distance open to partial views along Syon Lane north of the GWR, from Grant Way and from the Goals Gillette Corner Sportsfield. It is considered that views of the site would be possible from the windows of residential and high-rise commercial buildings where they are orientated towards the site.
- 1.74 The following potential visual receptor groups have been identified:
- Residents in properties located adjacent to the site and within 100 m of its boundary, where windows or gardens are orientated towards the site;
  - Visitors to areas of public open space located within 2.5 km of the site; and
  - Users of public highways and rights of way located within 2.5 km of the site.
- 1.75 The second stage was to identify a series of representative views (RV) which illustrate the existing and proposed visibility of the site and the proposed development for the identified visual receptors.
- 1.76 In identifying the representative views, consideration has been given to view-associated planning policy of the London Plan, along with relevant local planning policy and Conservation Area appraisals. The evaluation of the identified representative viewpoints has also taken into account the following:

- Type and relative numbers of people, and their occupation or activity;
- Location, nature and characteristics;
- Nature, composition and characteristics of the views (including directions); and
- Elements which may interrupt, filter or otherwise influence the views.

1.77 On this basis, 25 representative views were identified as an appropriate selection to demonstrate the visibility of the site from the visual receptors and to illustrate any changes in the view which would occur following completion of the proposed development. RV1-RV24 were identified during pre-application consultation with LBH; RV25 was added subsequently. Their locations are shown in Figure 1.7 and the rationale for their selection is summarised in Table 1.7.

<b>RV</b>	<b>Location</b>	<b>Comment</b>
1	Syon Lane Station	Identified as a sensitive view within the GWC: Appendix View Assessment (Ref. SS01) Includes the Gillette Tower, identified in the LBH Urban Context and Character Study as a landmark
2	Junction of Syon Lane and Great West Road (A4)	Typical townscape view from the south
3	Boston Manor Park (footpath)	Typical townscape view from the east Boston Manor Park falls within the Grand Union Canal & Boston Manor Conservation Area
4	Goals Gillette Corner Sportsfield	Typical townscape view from the north
5	Oaklands Avenue	Typical townscape view from the northwest Falls within the Osterley Park Conservation Area. The Conservation Area Appraisal identifies a view towards a focal point to the east (the pavilion); this view takes in the periphery of the Conservation Area view
6	Pavement of GWR (A4)	Typical townscape view from the southwest
7	Osterley Park (footpath)	Osterley Park is a Registered Park and Garden and a conservation area
8	Osterley Park (centre)	Osterley Park is a Registered Park and Garden and a conservation area
9	Osterley House	Identified as a sensitive view within the GWC: Appendix View Assessment (Ref. OP1)

<b>RV</b>	<b>Location</b>	<b>Comment</b>
		Osterley Park House is a Grade I listed building and falls within a Registered Park and Garden and Osterley Park Conservation Area
10	Osterley Park (bridleway)	Osterley Park is a Registered Park and Garden and a conservation area
11	Boston Manor House	Identified as a sensitive view within the GWC: Appendix View Assessment (Ref. BM1) Boston Manor Park falls within the Grand Union Canal Conservation Area
12	St Paul's Recreation Ground	St Paul's Recreation Ground falls within St. Pauls Brentford Conservation Area
13	Syon Park (Gate Lodge)	Identified as a sensitive view within the GWC: Appendix View Assessment (Ref. SP3) Syon Park is a Registered Park and Garden and falls within the Isleworth Riverside Conservation Area
14	Syon Park southern entrance footpath (north)	Identified as a sensitive view within the GWC: Appendix View Assessment (Ref. SP2) and within LBH Urban Context and Character Study (Isleworth district view) Syon Park is a Registered Park and Garden and falls within the Isleworth Riverside Conservation Area and the Royal Botanic Gardens WHS Buffer Zone
15	Syon Park southern entrance footpath (south)	Identified as a sensitive view within the GWC: Appendix View Assessment (Ref. SP1) Syon Park is a Registered Park and Garden and falls within the Isleworth Riverside Conservation Area
16	Riverside Walk Isleworth	Falls within Isleworth Riverside Conservation Area and the Thames Landscape Strategy as a vista
17	Riverside walk Kew	Falls within Old Deer Park Conservation Area and identified within LBRuT Proposal Map and identified within LBH Urban Context and Character Study (Isleworth district view)

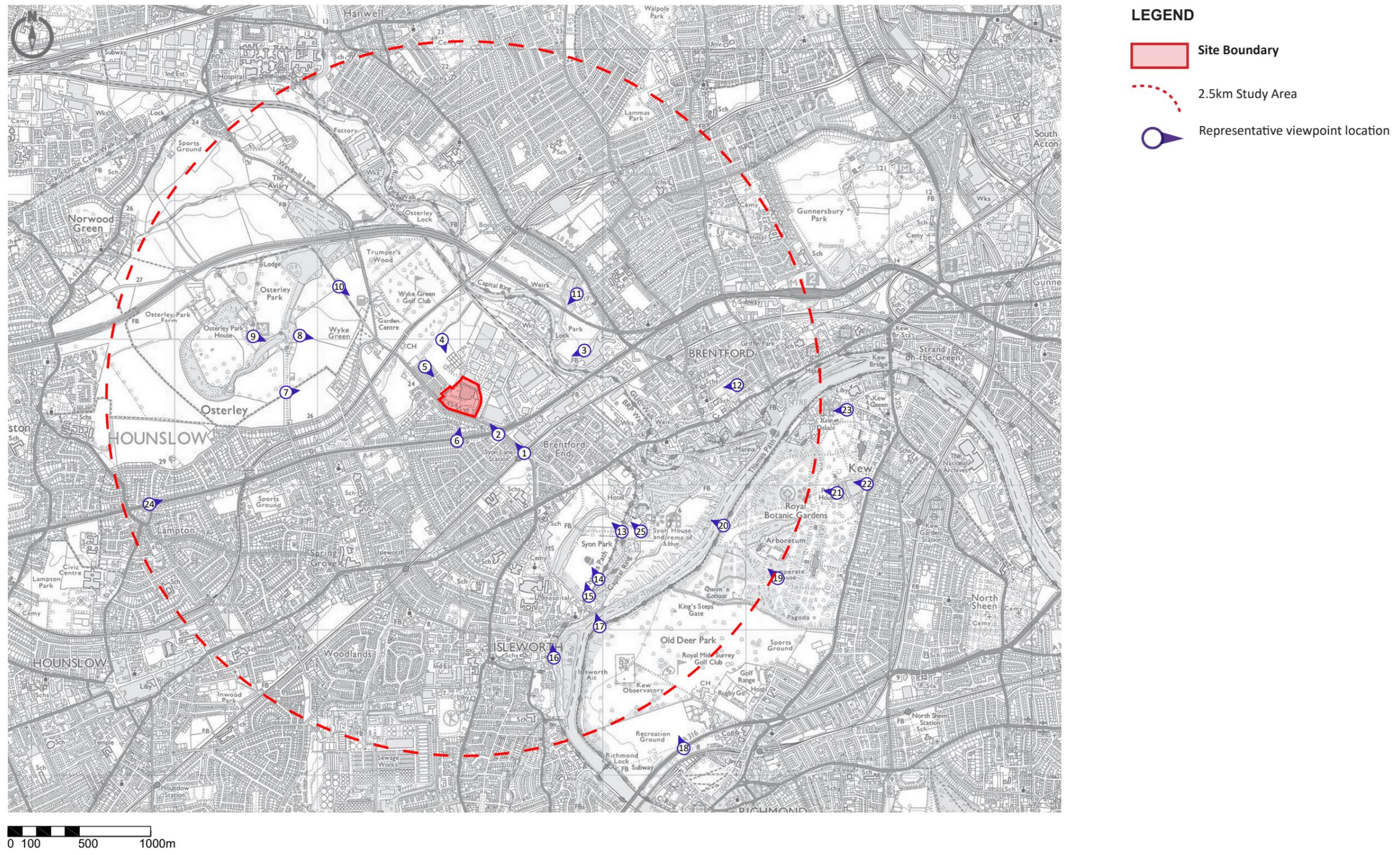


Figure 1.7

<b>RV</b>	<b>Location</b>	<b>Comment</b>
18	Old Deer Park	Falls within Old Deer Park Conservation Area and identified within LBRuT Proposal Map and the Thames Landscape Strategy as a vista
19	Botanical Gardens Kew, Cedar Vista east	Identified as a sensitive view within the GWC: Appendix View Assessment (Ref. BG11) Botanical Gardens Kew is a World Heritage Site, Registered Park and Garden and a conservation area
20	Botanical Gardens Kew, Syon Vista/ Cedar Vista west	Identified as a sensitive view within the GWC: Appendix View Assessment (BG10) and within LBH Urban Context and Character Study (Isleworth district view) Botanical Gardens Kew is a World Heritage Site, Registered Park and Garden and a conservation area
21	Botanical Gardens Kew, west of the Palm House	Identified as a sensitive view within the GWC: Appendix View Assessment (BG7) Botanical Gardens Kew is a World Heritage Site, Registered Park and Garden and a conservation area
22	Botanical Gardens Kew, close to 'the Botanical' building	Identified as a sensitive view within the GWC: Appendix View Assessment (BG9) Botanical Gardens Kew is a World Heritage Site, Registered Park and Garden and a conservation area
23	Botanical Gardens Kew, west of Elizabeth Gates	Identified as a sensitive view within the GWC: Appendix View Assessment (BG4) Botanical Gardens Kew is a World Heritage Site, Registered Park and Garden and a conservation area
24	GWR and Jersey Road	Typical, long distance, townscape view from the west
25	Syon House	Syon House is a Grade I listed building and falls within a Registered Park and Garden and Conservation Area

1.78 The value of each representative view is summarised in Table 1.8. The criteria for defining value are provided in Table 1.1 in Technical Appendix 1.2 of this Volume and further commentary on the assessment of value of each representative view is provided in Technical Appendix 1.3 of this volume.

<b>RV</b>	<b>Location</b>	<b>Approximate Distance from Closest Site Boundary</b>	<b>Visibility (Existing)</b>	<b>Value</b>
1	Syon Lane Station	445 m	No View	Medium
2	Junction of Syon Lane and Great West Road (A4)	245 m	No View	Low
3	Boston Manor Park (footpath)	785 m	No View	Medium
4	Goals Gillette Corner Sportsfield	300 m	Glimpse	Medium
5	Oaklands Avenue	120 m	No View	Medium
6	Pavement of GWR (A4)	330 m	No View	Poor
7	Osterley Park (footpath)	1.07 km	No View	Medium
8	Osterley Park (centre)	1.07 km	No View	Medium
9	Osterley House	1.35 km	No View	High
10	Osterley Park (bridleway)	1.05 km	No View	Medium
11	Boston Manor House	960 m	No View	Medium
12	St Paul's Recreation Ground	1.70 km	No View	Medium
13	Syon Park (Gate Lodge)	1.25 km	No View	Medium to High
14	Syon Park southern entrance footpath (north)	1.35 km	No View	Medium to High
15	Syon Park southern entrance footpath (south)	1.45 km	No View	Medium to High
16	Riverside Walk Isleworth	1.80 km	No View	Medium
17	Riverside Walk Kew	1.70 km	No View	High
18	Old Deer Park	2.65 km	No View	Medium
19	Botanical Gardens Kew, Cedar Vista east	2.00 km	No View	Exceptional

**Table 1.8: Visual Receptors' Representative Views Value**

RV	Location	Approximate Distance from Closest Site Boundary	Visibility (Existing)	Value
20	Botanical Gardens Kew, Syon Vista/ Cedar Vista west	1.90 km	No View	Exceptional
21	Botanical Gardens Kew, west of the Palm House	2.60 km	No View	Exceptional
22	Botanical Gardens Kew, close to 'the Botanical' building	2.80 km	No View	Exceptional
23	Botanical Gardens Kew, west of Elizabeth Gates	2.60 km	No View	Exceptional
24	GWR and Jersey Road	2.15 km	No View	Poor
25	Syon House	1.40 km	No View	High

**Table 1.9: Summary of Townscape Receptor Sensitivity**

Townscape Receptor	Value	Susceptibility to Change	Sensitivity
TCA1 – GWR Corridor	Poor	Low	Low
TCA2 – Osterley & Spring Grove non-residential	Low	Low	Low
TCA3 – Historic Brentford and Isleworth	Medium to High	Medium	Medium to High
TCA4 – Brentford and South Ealing residential	Low	Low	Low
TCA5 – Osterley, Spring Grove and Isleworth residential	Low	Low	Low
TCA6 - Osterley Park	High	High	High
TCA7 – Arcadian Thames and historic landscapes	Exceptional	High	High

## Sensitive Receptors

### Townscape Receptors

- 1.79 The sensitivity of the proposed development of the townscape receptors identified at the baseline stage has been considered in light of their 'susceptibility to change' and their previously determined value.
- 1.80 The site is located within TCA 2 – Osterley & Spring Grove non-residential which falls within the Great West Corridor Opportunity Area. LBH have set out a vision for the area to attract new businesses, make more efficient use of land and create an improved urban environment and, in line with this vision, the proposed development would provide a quality environment for people, giving the area an identity and providing a high quality living environment with defined building frontages on to Grant Way, Syon Lane and MacFarlane Lane. The height and form of the proposed development respond sensitively to the neighbouring former Gillette Factory and do not compete with or detract from its iconic clock tower in local views. It is therefore considered that TCA2 can accommodate the proposed development and has a low susceptibility to change, as defined in the methodology Table 1.3 in Technical Appendix 1.2 of this Volume.
- 1.81 Townscape receptors have a varying susceptibility to change and sensitivity to the proposed development and the proposed development would indirectly affect them to varying degrees. Table 1.9 presents the assessment of the 'value' and 'susceptibility to change' of each townscape character area together with their 'sensitivity'.

### Visual Receptors' Representative Views

- 1.82 The method by which susceptibility to change and sensitivity to the proposed development is determined for each visual receptor's representative view is described in Technical Appendix 1.2 of this Volume; the findings are summarised in Table 1.10.

**Table 1.10: Summary Visual Receptors' Representative View Sensitivity**

RV	Location	Value	Susceptibility to Change	Sensitivity
1	Syon Lane Station	Medium	Low	Low to Medium
2	Junction of Syon Lane and Great West Road (A4)	Low	Low	Low
3	Boston Manor Park (footpath)	Medium	High	Medium to High
4	Goals Gillette Corner Sportsfield	Medium	Low	Low to Medium
5	Oaklands Avenue	Medium	Medium	Medium
6	Pavement of GWR (A4)	Poor	Low	Low

RV	Location	Value	Susceptibility to Change	Sensitivity
7	Osterley Park (footpath)	Medium	High	Medium to High
8	Osterley Park (centre)	Medium	High	Medium to High
9	Osterley House	High	High	High
10	Osterley Park (bridleway)	Medium	High	Medium to High
11	Boston Manor House	Medium	High	Medium to High
12	St Paul's Recreation Ground	Medium	High	Medium to High
13	Syon Park (Gate Lodge)	Medium	Medium to High	Medium to High
14	Syon Park southern entrance footpath (north)	Medium	Medium to High	Medium to High
15	Syon Park southern entrance footpath (south)	Medium	Medium High	Medium to High
16	Riverside Walk Isleworth	Medium	High	Medium to High
17	Riverside walk Kew	High	High	High
18	Old Deer Park	Medium	Medium	Medium
19	Botanical Gardens Kew, Cedar Vista east	Exceptional	High	High
20	Botanical Gardens Kew, Syon Vista/ Cedar Vista west	Exceptional	High	High
21	Botanical Gardens Kew, west of the Palm House	Exceptional	High	High
22	Botanical Gardens Kew, close to 'the Botanical' building	Exceptional	High	High
23	Botanical Gardens Kew, west of Elizabeth Gates	Exceptional	High	High
24	GWR and Jersey Road	Poor	Low	Low

RV	Location	Value	Susceptibility to Change	Sensitivity
25	Syon House	High	High	High

## Assessment of Effects

### Demolition and Construction Effects

- 1.83 Townscape character and visual impacts associated with demolition and construction works typically relate to changes in views resulting from the removal of existing on-site buildings and structures, the enclosure of the site with hoarding and the introduction of taller elements such as scaffolding and construction plant. The latter is likely to include tower cranes, piling drivers and other construction plant (refer to Chapter 5: Demolition and Construction of ES Volume 1 for further information). Such plant and activities can present as incongruous temporary features within the townscape and views.
- 1.84 As indicated in ES Chapter 5, the demolition and construction works would implement best practice construction methods and housekeeping (i.e. tidy site) to reduce visual clutter, as specified within a project specific Construction Environmental Management Plan (CEMP).
- 1.85 The impact of the demolition and construction would be experienced throughout the entire construction period, with the peak towards the end of the period as the proposed development nears completion. However, it is noted that dependent on phasing, buildings within the proposed development may obscure views of the elements still under construction from certain locations.
- 1.86 All demolition and construction impacts would be temporary and short to medium term.

### Townscape Receptors

- 1.87 The proposed development falls within TCA2 - Osterley & Spring Grove non-residential. The impact of the demolition and construction activities would be limited to the site and its immediate surroundings. Demolition and construction would have a local, direct, temporary, short to medium term, medium magnitude of impact on TCA2. When combined with the low sensitivity of TCA2, this would lead to a temporary **Moderate to Minor Adverse** effect.
- 1.88 Limited partial to glimpsed views of the proposed development's hoarding would be possible at street level from TCA1 - GWR Corridor to the immediate south of the site and TCA5 - Osterley, Spring Grove and Isleworth residential to the south-west. From slightly further away, taller elements such as cranes would be intermittently visible above intervening visual barriers. The proposed development would have a local, indirect, temporary, short to medium term, medium to low magnitude of impact. When combined with the low sensitivity of TCA1 and TCA5, there would be a temporary, **Minor Adverse** effect on these TCAs.

- 1.89 It is likely that limited glimpsed views of the cranes would be visible from areas of TCA4 – Brentford and South Ealing residential and TCA6 - Osterley Park, resulting in a district, indirect, temporary, short to medium term, **low and very low** magnitude of impact, respectively. When combining with the respective sensitivity of these receptors, the temporary effect would be **Minor Adverse**.
- 1.90 It is considered that intervening built form and tree cover would obscure the majority of views of construction activity from TCA3 - Historic Brentford and Isleworth and TCA7 - Arcadian Thames and historic landscapes. The proposed development would have a district, indirect, temporary, short to medium term, **very low** magnitude of impact. When combining with the respective sensitivity of these receptors, the temporary effect would be **Negligible Adverse** on these TCAs.
- 1.91 Table 1.11 summarises the demolition and construction effects of the proposed development on the Townscape Character Area Receptors.

**Table 1.11: Demolition and Construction Townscape Character Area Effect Summary**

Townscape Receptor	Sensitivity	Magnitude of Impact	Likely Effect
TCA1 – GWR Corridor	Low	Low to Medium	Minor Adverse
TCA2 – Osterley & Spring Grove non-residential	Low	Medium	Minor to Moderate Adverse
TCA3 – Historic Brentford and Isleworth	Medium to High	Very Low	Negligible neutral
TCA4 – Brentford and South Ealing residential	Low	Low	Minor Adverse
TCA5 – Osterley, Spring Grove and Isleworth residential	Low	Low to Medium	Minor to Moderate Adverse
TCA6 - Osterley Park	High	Very Low	Minor Adverse
TCA7 – Arcadian Thames and historic landscapes	High	Very Low	Negligible Neutral

### Visual Receptors' Representative Views

- 1.92 Visual effects of the demolition and construction stage would be linked to the visibility of the site hoarding and site access in nearby views and the visibility of taller construction elements such as cranes and scaffolding in longer views. For a full description of the magnitude of impact and

effect please refer to Technical Appendix 1.3 of this Volume. The assessment conclusions are summarised in Table 1.12.

**Table 1.12: Demolition and Construction Visual Effects Summary**

RV	Location	Sensitivity	Magnitude of Impact	Likely Effect
1	Syon Lane Station	Low to Medium	Low	Minor Adverse
2	Junction of Syon Lane and Great West Road (A4)	Low	Medium	Minor to Moderate Adverse
3	Boston Manor Park (footpath)	Medium to High	Low	Minor Adverse
4	Goals Gillette Corner Sportsfield	Low to Medium	Medium to High	Moderate Adverse
5	Oaklands Avenue	Medium	Low to Medium	Minor to Moderate Adverse
6	Pavement of GWR (A4)	Low	Low to Medium	Minor Adverse
7	Osterley Park (footpath)	Medium to High	Very Low	Minor Adverse
8	Osterley Park (centre)	Medium to High	Low	Minor to Moderate Adverse
9	Osterley House	High	None	None
10	Osterley Park (bridleway)	Medium to High	Low	Minor to Moderate Adverse
11	Boston Manor House	Medium to High	None	None
12	St Paul's Recreation Ground	Medium to High	None	None
13	Syon Park (Gate Lodge)	Medium to High	Very low	Minor Adverse
14	Syon Park southern entrance footpath (north)	Medium to High	Low	Minor to Moderate Adverse

**Table 1.12: Demolition and Construction Visual Effects Summary**

RV	Location	Sensitivity	Magnitude of Impact	Likely Effect
15	Syon Park southern entrance footpath (south)	Medium to High	Very low	Minor Adverse
16	Riverside Walk Isleworth	Medium to High	None	None
17	Riverside walk Kew	High	None	None
18	Old Deer Park	Medium	None	None
19	Botanical Gardens Kew, Cedar Vista east	High	None	None
20	Botanical Gardens Kew, Syon Vista/ Cedar Vista west	High	None	None
21	Botanical Gardens Kew, west of the Palm House	High	None	None
22	Botanical Gardens Kew, close to 'the Botanical' building	High	None	None
23	Botanical Gardens Kew, west of Elizabeth Gates	High	None	None
24	GWR and Jersey Road	Low	Very low	Negligible Adverse
25	Syon House	High	Very low	Negligible Adverse

## Completed Development Effects

- 1.93 The proposed development falls within the Great West Corridor Opportunity Area and LBH’s draft Great West Corridor Local Plan Review sets out a vision to transform the area.
- 1.94 The proposed development comprises nine development parcels with five distinct building typologies. The height and massing respond sensitively to the surrounding area, including the adjacent Grade II former Gillette factory; the maximum heights, locations and size of the parcels have been designed so they do not compete with or detract from the iconic clock tower in local views. The Design Code identifies key design principles for each of the development parcels which are to be used to inform the design proposals for Reserved Matters Applications, ensuring that there would be a consistency of approach and overarching design quality across the proposed development as a whole.

- 1.95 The development of the proposals has been landscape-led and guided by a set of key principles to ensure the proposed development can be successfully integrated into the receiving townscape:
- Development Parcels which define strong, positive and active frontages to streets and spaces within the site and at its perimeter;
  - High quality brick and masonry utilised as the primary facing materials;
  - Massing of blocks which creates a series of blocks with greater height away from the perimeter of the site;
  - Key corner buildings should be designed as focal buildings to frame views and emphasise key pedestrian routes through the site to aid wayfinding;
  - Enhancements to the existing streetscape along Syon Lane, Grant Way and Macfarlane Lane, including retaining higher value trees where appropriate and additional tree planting;
  - Protecting and framing key views from within the site towards the iconic Gillette clock tower;
  - Restoration of the Water Gardens on the northern boundary as a publicly accessible public open space; and
  - Promotion of biodiversity and sustainability through wildlife friendly planting and ecological enhancements.
- 1.96 The buildings and spaces would respond to the existing context of the site, with consideration particularly given to the edge relationships. The proposed development would create defined building frontages on to Grant Way, Syon Lane and MacFarlane Lane, whilst the tallest buildings on the site are located towards the centre of the site, with height stepping down towards the more sensitive southern and western edges of the site.
- 1.97 Fronting Syon Lane, the building typology would respond to the height of the low-slung structure of the former Gillette Factory to the east, establishing a strong shoulder to Syon Lane at six storeys; whilst the buildings reference the height of the Gillette building, they turn ends to Syon Lane to reduce the scale of the buildings.
- 1.98 Responding to the existing western and southern edges of the site, the building typology is 2-3 storey terraces of houses, to mitigate any impacts on existing residents who overlook the site. Frontage widths repeat and reference those of the surrounding streets, with a common language of front doors and private defensible space at street level. The terraces would activate the frontages onto the surrounding streets.
- 1.99 Refer to ES Chapter 4: Proposed Development Description for further information.

## Townscape Receptors

- 1.100 The proposed development falls within TCA2 - Osterley & Spring Grove non-residential. It is considered that the proposed development would improve the townscape character of TCA2, creating a new, vibrant quarter and providing a focus for the community. The scale and design of the blocks would provide a transition between the large industrial grain present within TCA2 and the finer residential grain of the adjacent TCA5 - Osterley, Spring Grove and Isleworth

residential. This is demonstrated in representative views 2, 4, 5 and 6 set out in Technical Appendix 1.3 of this chapter. The proposed development would provide new public realm and improve the frontage along Syon Lane with sections of active frontages and generous areas of landscaping, which would retain trees along Syon Lane wherever possible. The proposed development would have a local, direct, permanent, long term, medium magnitude of impact on TCA2 and the effect would be **Minor Beneficial**.

- 1.101 TCA5 - Osterley, Spring Grove and Isleworth residential abuts the site to the south and west and Blocks C, D, E and J which front on to Syon Lane and Macfarlane Lane step down in height to address the lower rise residential dwellings within TCA5. Limited partial to glimpsed short to medium distance views are likely to be visible to the upper floors of the proposed development's buildings from further afield in TCA5 (illustrated in representative views 5 and 6). TCA1 - Great West Corridor abuts the site to the west; however, the larger scale of the built form within the TCA would block most views of the proposed development. Where the proposed development is visible, the variation in the proposed buildings massing would create a varied skyline and the taller blocks would highlight the new quarter (illustrated in representative views 1 and 2). Overall, it is considered that the proposed development would have a local, indirect, permanent, long term, low to medium magnitude of impact on TCA5 and TCA1 and the effect would be **Minor Beneficial**.
- 1.102 Limited glimpsed views to the upper floors of the proposed development's taller buildings would be visible from areas of TCA4 - Brentford and South Ealing residential, TCA6 - Osterley Park (illustrated in representative views 7, 8, 9 and 10) and from some areas of TCA7 - Arcadian Thames and historic landscapes (demonstrated in representative views 13, 14 and 15). The visibility from these areas would vary subject to the season with the mature trees present within these areas filtering views. It is considered that the proposed development would have a local, indirect, permanent, long term, very low magnitude of impact and a **Negligible Neutral** effect on TCA4 - Brentford and South Ealing residential, TCA6 - Osterley Park and TCA7 - Arcadian Thames and historic landscapes.
- 1.103 It is considered that intervening built form would prevent the majority of the views to the proposed development from TCA3 - Historic Brentford and Isleworth, as shown in representative views 12 and 16. It is therefore considered that it would have no impact and **No** effect.

Table 1.13: Completed Development Townscape Character Effects Summary			
Townscape Receptor	Sensitivity	Magnitude of Impact	Likely Effect
TCA1 - GWR Corridor	Low	Low to Medium	Minor Beneficial
TCA2 - Osterley & Spring Grove non-residential	Low	Medium	Minor to Moderate Beneficial

Table 1.13: Completed Development Townscape Character Effects Summary			
TCA3 - Historic Brentford and Isleworth	Medium to High	None	None
TCA4 - Brentford and South Ealing residential	Low	Very Low	Negligible Neutral
TCA5 - Osterley, Spring Grove and Isleworth residential	Low	Low to Medium	Minor Beneficial
TCA6 - Osterley Park	High	Very Low	Negligible Neutral
TCA7 - Arcadian Thames and historic landscapes	High	Very Low	Negligible Neutral

### Visual Receptors' Representative Views

- 1.104 The proposed development's ZTV would extend beyond the existing situation due to the relatively flat landform present within the study area and the height of the proposed development, with the proposed development being visible from further afield.
- 1.105 In near views, the proposed development would be visible from surrounding properties that have windows or gardens orientated towards it, in linear views from some of the roads orientated towards it, such as Syon Lane (representative view 1) and Oaklands Avenue (representative view 5), from junctions (representative views 2 and 6), and from areas of open space such as Goals Gillette Corner Sportsfield (representative view 4).
- 1.106 From further afield to the west, upper storeys of the proposed development would be intermittently visible, although views would often be obscured by intervening built form (representative view 24).
- 1.107 To the north-west from Osterley Park, there would be occasional glimpsed views (representative views 7, 8 and 10) although these would be generally screened by intervening tree cover and built form; the proposed development would not be visible for Osterley House (representative views 9). From the locations to the east, views of the development would also often be screened (representative views 3, 11 and 12).
- 1.108 Kinetic, glimpsed views of the proposed development would be gained from parts of Syon Park, but not from Syon House itself (representative views 13, 14, 15 and 25).
- 1.109 Views from the Royal Botanic Garden, Isleworth riverside and the Thames Path would be screened by intervening visual barriers (representative views 16, 17, 18, 19, 20, 21, 22 and 23).
- 1.110 Where effects on the visual receptor representative views resulting from the proposed development have been identified, these would be direct, permanent and long term. For a full description of the magnitude of impact and effect please refer to Technical Appendix 1.3, A summary is provided in Table 1.14.

**Table 1.14: Completed Development Visual Effects Summary**

RV	Location	Sensitivity	Magnitude of Impact	Likely Effect
1	Syon Lane Station	Low to Medium	Low	Minor Beneficial
2	Junction of Syon Lane and Great West Road (A4)	Low	Medium	Minor to Moderate Beneficial
3	Boston Manor Park (footpath)	Medium to High	Very Low	Negligible Neutral
4	Goals Gillette Corner Sportsfield	Low to Medium	Medium to High	Moderate Beneficial
5	Oaklands Avenue	Medium	Low to Medium	Minor to Moderate Neutral
6	Pavement of GWR (A4)	Low	Low to Medium	Minor Beneficial
7	Osterley Park (footpath)	Medium to High	Very low	Minor Neutral
8	Osterley Park (centre)	Medium to High	Low	Minor to Moderate Neutral
9	Osterley House	High	None	None
10	Osterley Park (bridleway)	Medium to High	Low	Minor to Moderate Neutral
11	Boston Manor House	Medium to High	None	None
12	St Paul's Recreation Ground	Medium to High	None	None
13	Syon Park (Gate Lodge)	Medium to High	Very low	Minor Neutral
14	Syon Park southern entrance footpath (north)	Medium to High	Low	Minor to Moderate Neutral
15	Syon Park southern entrance footpath (south)	Medium to High	Very low	Minor Neutral

**Table 1.14: Completed Development Visual Effects Summary**

RV	Location	Sensitivity	Magnitude of Impact	Likely Effect
16	Riverside Walk Isleworth	Medium to High	None	None
17	Riverside walk Kew	High	None	None
18	Old Deer Park	Medium	None	None
19	Botanical Gardens Kew, Cedar Vista east	High	None	None
20	Botanical Gardens Kew, Syon Vista/ Cedar Vista west	High	None	None
21	Botanical Gardens Kew, west of the Palm House	High	None	None
22	Botanical Gardens Kew, close to 'the Botanical' building	High	None	None
23	Botanical Gardens Kew, west of Elizabeth Gates	High	None	None
24	GWR and Jersey Road	Low	None	None
25	Syon House	High	Very Low	Negligible Neutral

## Enhancement Measures

1.111 No enhancement measures are proposed in respect of townscape and visual effects.

## Assessment of Residual Effects

### Additional Mitigation

1.112 No additional mitigation is recommended.

### Demolition and Construction Residual Effects

1.113 Since no additional mitigation is recommended, the residual demolition and construction effects remain as reported in the assessment of effects sections and summarised in Table 1.15.

## Completed Development Residual Effects

1.114 As no additional mitigation is recommended, the residual completed development effects remain as reported in the assessment of effects sections and summarised in Table 1.15. Ensuring reserved matters applications comply with the Design Code and the imposition of pre-commencement planning conditions would contribute to ensuring that the completed development is of sufficient quality.

## Summary of Residual Effects

1.115 Table 1.15 provides a tabulated summary of the outcomes of the townscape and visual assessment of the proposed development.

Table 1.15: 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
<b>Demolition and Construction</b>								
<b>Townscape Character Area Receptors</b>								
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		Minor to Moderate (not significant)		D			

Table 1.15: 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
	structures, the enclosure of the site with hoarding and presence of taller elements							
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	Glimpses of taller		Negligible (not significant)					

Table 1.15: 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	
				-	I	T	IR	Mt	Lt
historic landscapes	construction elements								
<b>Visual Receptors Representative Views</b>									
1	Syon Lane Station	Change in view due to the enclosure of the site with hoarding and presence of taller elements	Minor (not significant)	-					
2	Junction of Syon Lane and Great West Road (A4)	Change in view due to presence of taller elements	Minor to Moderate (not significant)	-					
3	Boston Manor Park (footpath)	Glimpses of taller construction elements	Minor (not significant)	-	D	T	IR	Mt	
4	Goals Gillette Corner Sportsfield	Change in view due to the enclosure of the site with hoarding and presence of taller elements	Moderate (significant)	-					
5	Oaklands Avenue	Change in view due to	Minor to Moderate (not significant)	-					

Table 1.15: 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	
				-	I	T	IR	Mt	Lt
	presence of taller elements								
6	Pavement of GWR (A4)	Change in view due to presence of taller elements	Minor (not significant)	-					
7	Osterley Park (footpath)	Glimpses of taller construction elements	Minor (not significant)	-					
8	Osterley Park (centre)	Glimpses of taller construction elements	Minor to Moderate (not significant)	-					
9	Osterley House	None	None	-					
10	Osterley Park (bridleway)	Glimpses of taller construction elements	Minor to Moderate (not significant)	-					
11	Boston Manor House	None	None	N/A	N/A	N/A	N/A	N/A	N/A
12	St Paul's Recreation Ground	None	None	N/A	N/A	N/A	N/A	N/A	N/A
13	Syon Park (Gate Lodge)	Glimpses of taller construction elements	Minor	-	D	T	IR	Mt	

**Table 1.15: 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
				-	I	T	IR	Mt
								Lt
14	Syon Park southern entrance footpath (north)		Minor to Moderate (not significant)	-				
15	Syon Park southern entrance footpath (south)		Minor	-				
16	Riverside Walk Isleworth		None	N/A	N/A	N/A	N/A	N/A
17	Riverside walk Kew		None	N/A	N/A	N/A	N/A	N/A
18	Old Deer Park		None	N/A	N/A	N/A	N/A	N/A
19	Botanical Gardens Kew, Cedar Vista east		None	N/A	N/A	N/A	N/A	N/A
20	Botanical Gardens Kew, Syon Vista/ Cedar Vista west		None	N/A	D	T	IR	Mt
21	Botanical Gardens Kew, west of the Palm House		None	N/A	N/A	N/A	N/A	N/A

**Table 1.15: 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
				-	I	T	IR	Mt
								Lt
22	Botanical Gardens Kew, close to 'the Botanical' building		None	N/A	N/A	N/A	N/A	N/A
23	Botanical Gardens Kew, west of Elizabeth Gates		None	N/A	N/A	N/A	N/A	N/A
24	GWR and Jersey Road		Negligible (not significant)	-	D	T	IR	Mt
25	Syon House		Negligible (not significant)	-	D	T	IR	Mt
<b>Completed Development</b>								
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

**Table 1.15: 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	
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			
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)	+	D	P	IR	Lt	
3	Boston Manor Park (footpath)	Glimpsed views of built form	Negligible (not significant)	+/-					
4	Goals Gillette	Introduction of built form	Moderate (significant)	+					
None required									

**Table 1.15: 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
	Corner Sportsfield							
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
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)	+/-	D	P	IR	Lt
14	Syon Park southern entrance	Glimpsed views of built form	Minor to Moderate (not significant)					

**Table 1.15: 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
				-	I	T	IR	Mt
								Lt
	footpath (north)							
15	Syon Park southern entrance footpath (south)		Minor (not significant)					
16	Riverside Walk Isleworth		None	N/A	N/A	N/A	N/A	N/A
17	Riverside walk Kew		None	N/A	N/A	N/A	N/A	N/A
18	Old Deer Park		None	N/A	N/A	N/A	N/A	N/A
19	Botanical Gardens Kew, Cedar Vista east		None	N/A	N/A	N/A	N/A	N/A
20	Botanical Gardens Kew, Syon Vista/ Cedar Vista west		None	N/A	N/A	N/A	N/A	N/A
21	Botanical Gardens Kew, west of the Palm House		None	N/A	N/A	N/A	N/A	N/A
22	Botanical Gardens Kew, close to 'the		None	N/A	N/A	N/A	N/A	N/A

**Table 1.15: 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
				-	I	T	IR	Mt
								Lt
	Botanical' building							
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	1R	Lt

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

### Intra-Project Effects

1.116 As explained in Chapter 2: EIA Process and Methodology, intra-project cumulative effects are discussed in Chapter 5: Cumulative Effects.

### Inter-Project Effects

1.117 Eight consented cumulative schemes have been identified as potentially relevant to the assessment of inter-project effects – a ninth scheme, the Homebase Syon Lane scheme, has also been identified as a cumulative scheme since it is due to be submitted at the same time as the proposed development (see Table 1.16).

1.118 To inform the assessment of cumulative effects, AVR's of the cumulative schemes have been prepared (see Technical Appendix 1.3).

**Table 1.16: Cumulative Schemes**

Reference	Scheme Name and Application Number	Planning Status	Approximate distance from site
1	New Horizons Court, Ryan Drive, Brentford, TW8 9EP (Ref: 02912/A/PA2, APP/F5540/W/16/3165799)	Approved 4 July 2017	300 m
2	4 and 8 Harlequin Avenue, Brentford, TW8 9EW (Ref: 00558/4-8/P1)	Approved 21 December 2018	175 m
3	1 Commerce Road, Brentford, London, TW8 8LE (Ref: 00297/H/P13)	Approved on 10 January 2019	1.12 km
4/5	891 Great West Road, Isleworth London TW7 5PD (Ref: 00505/891/P4_P5)	Allowed on appeal 4 April 2019	200 m
6	former Syon Gate Service Station, Land at South of Gillette Corner, Great West Road, Isleworth TW7 5NP (Ref: 00505/AF/P28)	Approved at Planning Committee 2 May 2019	220 m
7	Sky, Sites 6 & 7, Grant Way, Isleworth TW7 5QD (Ref: 00558/A/P69)	Approved 4 September 2019	140 m
8	Bolder Academy, 1 MacFarlane Lane, Isleworth, TW7 5PN (Ref: 01106/W/P9)	Approved 4 September 2019	270 m
9	Homebase, Syon Lane, Isleworth TW7 5NZ (Ref: TBC)	Submitted August 2020	255 m

1.119 Table 1.17 provides a summary of the likely cumulative effects resulting from the proposed development and the cumulative schemes. Further detail of the cumulative visual effects is provided in Technical Appendix 1.3 of this Volume.

**Table 1.17: Inter-Project Cumulative Effects**

Cumulative Development	Demolition and Construction		Completed Development	
	Cumulative Effects Likely?	Reason	Cumulative Effects Likely?	Reason
<b>Townscape Effects</b>				
Ref: 1) New Horizons Court, Ryan Drive, Brentford, TW8 9EP	No	Permission is for change of use. No changes in massing of existing built form.	No	Permission is for change of use. No changes in massing of existing built form.
Ref: 2) 4 and 8 Harlequin Avenue, Brentford, TW8 9EW	No	Development is of insufficient scale.	No	Scale (six storeys) is complementary to existing townscape and would not be visible in views towards the proposed development.
Ref: 3) 1 Commerce Road, Brentford, London, TW8 8LE	No	Distance from site.	No	Distance from site.
Ref: 4/5) 891 Great West Road, Isleworth London TW7 5PD	No	Development is of insufficient scale.	No	Scale (four/five storeys) is complementary to existing townscape and would not be visible in views towards the proposed development.
Ref: 6) former Syon Gate Service Station, Land at South of Gillette Corner, Great West Road, Isleworth TW7 5NP	No	Perception of construction activity would be limited.	No	Scale (four/five storeys) is complementary to existing townscape and to proposed development.

**Table 1.17: Inter-Project Cumulative Effects**

Cumulative Development	Demolition and Construction		Completed Development	
	Cumulative Effects Likely?	Reason	Cumulative Effects Likely?	Reason
Ref: 7) Sky, Sites 6 & 7, Grant Way, Isleworth TW7 5QD	No	Located within TCA2, however awareness of construction activity would be limited.	No	Scale is complementary to existing townscape and to proposed development.
Ref: 8) Bolder Academy, 1 MacFarlane Lane, Isleworth, TW7 5PN	No	Awareness of construction activity would be limited.	No	Scale (four/five storeys) is complementary to existing townscape and to proposed development.
Ref: 9) Homebase, Syon Lane, Isleworth TW7 5NZ	Yes	Proximity to site and scale of proposal.	Yes	Cumulative effect on TCAs 1 and 4 due to proximity and scale.
<b>Visual Effects</b>				
Ref: 1) New Horizons Court, Ryan Drive, Brentford, TW8 9EP	No	Permission is for change of use. No changes in massing of existing built form.	No	Permission is for change of use. No changes in massing of existing built form.
Ref: 2) 4 and 8 Harlequin Avenue, Brentford, TW8 9EW	No	Not visible in representative views due to intervening visual barriers/ distance from site	No	Not visible in representative views due to intervening visual barriers/ distance from site
Ref: 3) 1 Commerce Road, Brentford, London, TW8 8LE	No	Distance from site	No	Distance from site

**Table 1.17: Inter-Project Cumulative Effects**

Cumulative Development	Demolition and Construction		Completed Development	
	Cumulative Effects Likely?	Reason	Cumulative Effects Likely?	Reason
Ref: 4/5) 891 Great West Road, Isleworth London TW7 5PD	No	Not visible in representative views due to intervening visual barriers/ distance from site	No	Not visible in representative views due to intervening visual barriers/ distance from site
Ref: 6) former Syon Gate Service Station, Land at South of Gillette Corner, Great West Road, Isleworth TW7 5NP	No	Very limited glimpsed views of construction activity possible only in RV1, otherwise not visible in representative views due to intervening visual barriers.	No	Glimpsed views of eastern extent of development possible only in RV1, otherwise not visible in representative views due to intervening visual barriers.
Ref: 7) Sky, Sites 6 & 7, Grant Way, Isleworth TW7 5QD	No	Not visible in representative views due to intervening visual barriers/ distance from site	No	Not visible in representative views due to intervening visual barriers/ distance from site
Ref: 8) Bolder Academy, 1 MacFarlane Lane, Isleworth, TW7 5PN	No	Not visible in representative views due to intervening visual barriers/ distance from site	No	Not visible in representative views due to intervening visual barriers/ distance from site
Ref: 9) Homebase, Syon Lane, Isleworth TW7 5NZ	Yes	Construction activity visible in some representative	Yes	Visible in some representative views due to scale of proposals.

**Table 1.17: Inter-Project Cumulative Effects**

Cumulative Development	Demolition and Construction		Completed Development	
	Cumulative Effects Likely?	Reason	Cumulative Effects Likely?	Reason
		views due to scale of proposals.		

## Demolition and Construction Cumulative Effects

### Townscape Receptors

1.120 Due to the proximity and scale of cumulative scheme ref. 9 (Homebase, Syon Lane), construction activity associated with the cumulative scheme could be experienced in combination with the proposed development; however, the scale of effects associated with the construction activity would remain unchanged and there would be **No** cumulative townscape effects associated with the demolition and construction stage.

### Visual Receptors' Representative Views

1.121 Due to the proximity and scale of cumulative scheme ref. 9 (Homebase, Syon Lane), construction activity associated with the cumulative scheme would be visible in several representative views. Dependent on phasing and timing, this may result in a change in effect from that reported for the proposed development, as follows:

- RV1 Syon Lane Station – Magnitude of impact to High and effect to **Moderate to Major Adverse** and significant;
- RV13 Syon Park (Gate Lodge) - Magnitude of impact to Low and effect to **Minor to Moderate Adverse** and significant;
- RV15 Syon Park southern entrance footpath (south) - Magnitude of impact to Medium to Low and effect to **Moderate Adverse** and significant; and
- RV24 GWR and Jersey Road - Magnitude of impact to Low and effect to **Minor to Negligible Adverse**.

## Completed Development Cumulative Effects

### Townscape Receptors

1.122 No cumulative townscape effects associated with the completed proposed development have been identified.

## Visual Receptors' Representative Views

1.123 Due to the proximity and scale of cumulative scheme ref. 9 (Homebase, Syon Lane), on completion it would be visible in several of the representative views. There would be open views of it in the foreground of RV1 Syon Lane Station and it would obscure views of Block A of the proposed development; it would also be visible in several other views (see Technical Appendix 1.3 for further detail). This would result in a change in magnitude of impact and effect for the following views:

- RV1 Syon Lane Station – Magnitude of impact to Medium to High and effect to **Moderate to Major Beneficial** and significant; and
- RV15 Syon Park southern entrance footpath (south) - Magnitude of impact to Low to Medium and effect to **Moderate Neutral** and significant.

## Summary of Assessment

### Background

1.124 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.

1.125 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.

1.126 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.

1.127 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.

1.128 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.

## Demolition and Construction Effects

- 1.129 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.
- 1.130 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.
- 1.131 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 effects on the representative views:
- **Moderate Adverse** (significant) – RV4 Goals Gillette Corner Sportsfield;
  - **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.
- 1.132 The construction of the proposed development would not affect the remaining representative views. No mitigation measures are proposed.

## Completed Development Effects

- 1.133 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.
- 1.134 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.

- 1.135 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.
- 1.136 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); and RV14 Syon Park southern entrance footpath (north);
  - **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;
  - The proposed development would not affect the remaining representative views and would not be visible from the Royal Botanical Gardens at Kew. No mitigation measures are proposed.

## Cumulative Effects

- 1.137 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.
- 1.138 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;
  - **Moderate Adverse** (significant) - RV15 Syon Park footpath (north); and
  - **Minor Adverse** – RV13 Syon Park Gate Lodge

1.139 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 1.1:**

**Legislation Planning Policy and Guidance**

## APPENDIX 1.1 LEGISLATION, PLANNING POLICY AND GUIDANCE

## Legislation and Regulations

1.1. The European Landscape Convention (ELC) provides a basis for closer co-operation on landscape issues across Europe and was signed and ratified in the UK. This recognition of landscape matters raises their profile and the ELC has been set out to improve approaches to the planning, management and protection of landscapes throughout Europe.

1.2. The ELC defines landscape as *"an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors"* and it includes 'townscape', as well as all forms of rural landscape.

Planning Policy Context  
National Policy and Guidance

1.3. At a national level the National Planning Policy Framework (NPPF), published February 2019, sets out the Government's planning policies for England. Of the core objectives set out in the NPPF, the environmental objective is of relevance to this assessment. This is:

*"to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

1.4. Chapter 12 of the NPPF in paragraph 124 states that *"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."*

1.5. Paragraph 127 requires planning policies to ensure quality developments, which:

- *"function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *"are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *"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);*
- *"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; and*

- *"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."*

1.6. Chapter 15 of the NPPF (paragraphs 170 and 171) requires that planning policies and decisions should contribute to and enhance the natural and local environment by:

- *"protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)"* and
- *"distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure."*

1.7. The NPPF is supported by the National Planning Practice Guidance (2019). This is intended to provide more detailed guidance regarding the implementation of national policy set out in the NPPF and includes guidance on character and visual matters within its design category section.

1.8. Paragraph 003 of the Design Guidance category supports the need to evaluate and understand the defining characteristics of an area in order to identify appropriate design opportunities and policies. Paragraph 007 goes on to state that views into and out of larger sites should be carefully considered from the start of the design process.

1.9. The National Design Guidance states that *"creating high quality buildings and places is fundamental to what the planning and development process should achieve"*. It sets out how well-designed places that are *"beautiful, enduring and successful"* can be achieved. It forms part of the Government's collection of planning practice guidance.

1.10. The site falls with the National Character Area (NCA) Profile '111 Northern Thames Basin' and is described as extending from Hertfordshire in the west to the Essex coast in the east.

1.11. Key characteristics of NCA 11 include (in summary):

- *"The landform is varied with a wide plateau divided by river valleys. The prominent hills and ridges of the 'Bagshot Hills' are notable to the northwest and extensive tracts of flat land are found in the south.*
- *A diverse landscape with a series of broad valleys containing the major rivers Ver, Colne and Lea, and slightly steeper valleys of the rivers Stour, Colne and Roman. Numerous springs rise at the base of the Bagshot Beds and several reservoirs are dotted throughout the area*

- *The medieval pattern of small villages and dispersed farming settlement remains central to the character of parts of Hertfordshire and Essex.*
- *Brick-built dwellings are characteristic from the late 17th century onwards. Prior to this dwellings and farm buildings tended to be timber built with weatherboarding, now mainly painted white but traditionally black or tarred, and whitewashed plaster walls.\**

#### Local Policy, Guidance and Appraisals

##### Current Planning Policy

- 1.12. The development plan for the London Borough of Hounslow (LBH) comprises the London Plan: Spatial Development Strategy for London (2016), the LBH Local Plan 2015-2030 (2015) and development management supplementary planning documents (SPDs).
- 1.13. The London Plan was adopted in July 2011 and there have been alterations culminating in the 2016 consolidated Plan; it is the 'overall strategic plan for London'.
- 1.14. Chapter seven of the London Plan, 'London's Living Places and Spaces' is most relevant to townscape and visual impact. Within Policy '7.1(D) – Building London's Neighbourhoods and Communities', establishing the Mayor's strategic objective for new development within London, it states that the design of all new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood. This is reinforced with Policy '7.4 – Local Character', which provides that:  
*"development should have regard to the context of the area and scale, mass and orientation of surrounding buildings... development should build on the positive aspects of an area where character is ill-defined in order to contribute to establishing an enhanced character for the future function of the area."*
- 1.15. London Plan Policy '7.5 – Public Realm', states that development should aim to make the public realm "comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way".
- 1.16. London Plan Policy '7.6 – Architecture' provides that:  
*"buildings ... should be of the highest architectural quality; be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm; comprise details and materials that complement, not necessarily replicate, the local character; not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings."*
- 1.17. London Plan Policy '7.7 – Tall and Large Buildings' requires that:  
*"Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on*

*their surroundings ... should only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building... should not impact on local or strategic views adversely"*

- 1.18. London Plan Policies 7.11 and 7.12 concern the London View Management Framework and state that:  
*"The Mayor has designated a list of strategic views ... These views are seen from places that are publicly accessible and well used. They include significant buildings or urban landscapes that help to define London at a strategic level ... Development will be assessed for its impact on the designated view if it falls within the foreground, middle ground or background of that view.*  
*"New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate strategically important landmarks in these views."*
- 1.19. The London View Management Framework SPD 2012 seeks to designate, protect and manage views of London and some of its major landmarks, however the site does not fall within any of the 27 identified strategic views.
- 1.20. At a regional level, the London's Natural Signatures: The London Landscape Framework recognises the site as falling within the Landscape Character Type '11 Hounslow Gravels'.
- 1.21. It is described as:  
*"... characterised by recent industrial and interwar suburban development on flat land. Built development is interspersed by corridors and patches of open space along tributary streams. An example is the corridor of the River Crane, which runs from the east of Heathrow Airport, through Hounslow Heath to Twickenham. The whole area is dominated by Heathrow Airport"*.
- 1.22. Adopted in September 2015, LBH's Local Plan contains detailed planning and land use policies to be used by all decision makers considering development proposals for the use of land and building over the following 15 years.
- 1.23. LBH Local Plan Policy 'SV1 – Great West Corridor Plan'  
*"Our approach*  
*We will work with residents and stakeholders to explore and identify the potential capacity for additional employment-led mixed use development along the Great West Corridor and coordinate its regeneration.*  
*We will achieve this by*  
*Progressing a partial Local Plan review which will:*  
*(a) Identify the extent of the Great West Corridor;*

(b) Determine the location and sustainable quantum of additional employment and residential development above existing Local Plan levels for implementation through new site allocations;

(c) Coordinate the delivery of public and private investment in transport infrastructure throughout the Great West Corridor as identified in policy EC1;

(d) Progress the designation of the Great West Corridor as an Opportunity Area through the review of the London Plan;

(e) Support the growth of the media and digital sectors in line with the London Plan's identification of the area as a Strategic Outer London Development Centre;

(f) Improve linkages with Brentford town centre through public realm enhancements and improved connectivity and access to amenities and facilities for the businesses and workforce in the area;

(g) identify sites with suitability for tall buildings following further urban design work;

(h) Review existing employment designations, including the Locally Significant Industrial Sites, through an Employment Land Review and other appropriate evidence;

(i) Explore opportunities for mitigating and reducing the impact of noise and air pollution for existing and future residents;

(j) Review local infrastructure requirements through the preparation of an area-specific Infrastructure Delivery Plan; and

(k) Proceed with initial informal public consultation commencing before the end of 2015 and a target for adoption by the end of 2018."

#### 1.24. LBH Local Plan Policy 'SC4 - Scale and density of new housing development'

*"Our approach*

*We will ensure the scale and density of new housing development balances the need to make efficient use of land and achieves high quality design and accessibility, whilst responding to and reflecting local context and character and protecting existing residents' amenity. Large-scale developments will be required to include a mix of land uses and spaces to help create a sense of place and community neighbourhood.*

*We will achieve this by*

(a) *Optimising housing output, taking into account the policies for context and character, the design standards in the Local Plan and public transport accessibility on a case-by-case basis;*

(b) *Applying the design standards contained within this Local Plan to ensure the delivery of high quality developments which will not compromise the amenity of existing and future residents; and*

(c) *Having regard to the density ranges contained within the London Plan Policy 3.4 to help guide the design and scale of new housing developments. Notwithstanding this consideration, where opportunities to maximise housing densities at suitable larger sites in areas of good public transport accessibility exist or can be created, they should be explored where all other planning policies can be fully satisfied to achieve sustainable development.*

*We will expect development proposal to*

(d) *Meet the design standards set out in Building Regulations and the Local Plan and expanded upon within detailed supplementary guidance documents, including but not limited to, demonstrating compliance with prevailing daylighting standards (BRE Guidance 2011) and habitable room window separation guidance; and*

(e) *Respond to the Urban Context and Character Study, Conservation Area Appraisals, planning briefs, Neighbourhood Plan and other guidance prepared."*

#### 1.25. LBH Local Plan Policy 'CC1 Context and Character'

*"Our approach*

*We will recognise the context and varied character of the borough's places, and seek to ensure that all new development conserves and takes opportunities to enhance their special qualities and heritage.*

*We will achieve this by*

(a) *Improving and promoting the appreciation of the character and qualities of the distinctive areas of the borough, by securing development that sensitively and creatively responds to an area's character and by refusing poor quality design;*

(b) *Sustaining and conserving those areas which have a high quality, well established and coherent character that is sensitive to change;*

(c) *Enhancing those areas which have a medium quality, mixed character and which would benefit from sensitive improvement and intervention;*

(d) *Transforming those areas which have a low quality, poorly defined character and/or where an opportunity exists to establish a new coherent character, enhancing positive elements where they exist; and*

(e) *Monitoring and updating the Urban Context and Character Study and ensuring the study informs any supplementary planning documents.*

*We will expect development proposals to*

(f) *Have due regard to the Urban Context and Character Study and demonstrate how the proposal:*

i. *Responds to the design recommendations for each character area and urban type within which their development proposal is located.*

ii. *Responds to the wider context and history of the area, its communities, its natural landscape and its urban structure, form and function.*

iii. *Conserves and takes opportunities to enhance particular features or qualities that contribute to an area's character, e.g. mature trees.*

iv. *Provides opportunities to help form a new character or improve the poor aspects of an existing character that could benefit from enhancement; and*

v. *Responds to any local architectural vernacular that contributes to an area's character, for example bay windows."*

#### 1.26. LBH Local Plan Policy 'CC2 - Urban Design and Architecture'

*"Our approach*

*We will retain, promote and support high quality urban design and architecture to create attractive, distinctive, and liveable places.*

*We will achieve this by*

(a) Ensuring proactive urban design forms an integral part of council development plans, programmes and processes, and prioritising design guidance for areas of change and intensification;

(b) Working with applicants at an early stage (pre-application) to guide and shape the design of development proposals;

(c) Reviewing built and proposed developments, decisions and advice to help raise design standards and awareness of the value of good design;

(d) Working with housing providers to improve the design of estates as part of wider regeneration programmes;

(e) Working with local communities to understand and improve the urban design of their areas through, for example neighbourhood plans; and

(f) Using good practice guidance such as *By Design*, the *Urban Design Compendium*, the *Mayor's Housing Design Guide*, *Mayor's Housing SPG*, and *Building for Life* assessments.

We will expect development proposals to

(g) Understand, integrate and where possible add to the natural landscape; including the topography, geology, existing features, landscape context, local flora and fauna and wider ecological setting of an area. Schemes should ensure that trees are suitably sited, protected during detailed design and construction, and provide amenity for the long term through effective maintenance arrangements;

(h) Deliver the right land use mix, amount and density in the right places to support the rejuvenation of our town centres and the creation of healthy, diverse and varied places;

(i) Create places that are easy to get to and through, foster active lifestyles, are easy to understand and navigate and feel safe during the day and night, with a particular focus on pedestrians and cyclists;

(j) Function well in themselves and in their effect on surrounding areas, have a positive impact on the amenity of current and future residents, visitors and passers-by and help create Lifetime Neighbourhoods that foster social interaction and capital;

(k) Respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings. The orientation of buildings and uses on sites to make best use of opportunities for passive design and access to daylight/sunlight should be considered;

(l) Provide a clear distinction between private, semi-private and public space, through an understanding of fronts and backs of buildings, ground floor uses, and continuity of street frontages and enclosure of space to help foster comfortable, usable and safe places;

(m) Provide a high quality, comfortable, safe and attractive public realm, well-integrated into its surroundings through using clear, well-defined boundary and building lines to address and animate the public realm;

(n) Ensure buildings and spaces are designed to stand the test of time and are easily adaptable and resilient to social, economic and technological change, and can accommodate movement and car parking in a safe and useable way;

(o) Promote and support contemporary architecture that responds intelligently to

current and future lifestyles, needs and technology, whilst ensuring it's rooted in local context, at all scales;

(p) Promote low carbon design and incorporate energy efficiency measures that are themselves well integrated into the design and appearance of the development;

(q) Carefully consider external appearance, its composition and arrangement, through the use of high quality, durable materials and finishes and careful, considered detailing for building facades which add visual interest and richness to the street scene. A clear indication of how buildings are used and occupied should be presented, seizing opportunities for passive design wherever possible;

(r) Be designed to mitigate noise and air quality issues which significantly affect parts of the borough;

(s) Be designed so it is fully accessible to people with disabilities or impaired mobility;

(t) Provide adequate outlook, minimise overbearingness and overshadowing, and ensure sufficient sunlight and daylight to proposed and adjoining/adjacent dwellings; reduce reliance on single aspect dwellings, particularly if north facing, within noise bands C and D (as defined in the Noise Supplementary Planning Document) or containing 3 bedrooms or more; provide adequate levels of privacy and minimise direct overlooking through the careful layout, design and orientation of buildings and spaces; and

(u) Make well-designed provision for bicycles, and the acceptable storage of refuse, materials for recycling and composting and for convenient access for its deposit and collection in consultation with the council's waste services. Enclosures should be robust, well ventilated and attractively integrated with the building and screened for privacy and security."

#### 1.27. LBH Local Plan Policy 'CC3 Tall Buildings'

"Our approach

To contribute to regeneration and growth, we will support tall buildings of high quality in identified locations which accord with the principles of sustainable development.

We will achieve this by

(a) Supporting tall buildings in Hounslow town centre;

(b) Supporting a limited number of tall buildings in Feltham town centre;

(c) Supporting a limited number of tall buildings in Brentford town centre. These should be carefully designed and sensitively placed so as not to have a significant adverse impact on the setting of, views from and between heritage assets including Royal Botanic Gardens Kew World Heritage Site, Syon Park and the Thames foreshore landscape. They should also respect and respond to the area's special townscape and heritage value;

(d) Supporting tall buildings along sections of the A4 Golden Mile frontage. Specific sites will be identified in the Great West Corridor Plan subject to the delivery of strategic public transport improvements. These 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;

(e) Preserving the predominantly 2 to 3 storey (less than 10m) building heights across the rest of the borough with some limited scope for 4 to 6 storey (up to 20m) buildings/elements along main streets (for example London Road), to assist with way-finding and where the opportunity exists for higher density development;

(f) Not seeking to replace existing tall buildings which are in inappropriate locations (assessed against the criteria of this policy) and not allowing them to be a justification for the provision of new ones;

(g) Undertaking more detailed design analysis including a study to identify spatial sensitivities; and

(h) Working with our partners, particularly Historic England and Royal Botanic Gardens Kew World Heritage Site.

We will expect tall building development proposals to

(i) Be sensitively located and be of a height and scale that is in proportion to its location and setting, and carefully relate and respond to the character of the surrounding area;

(j) Be of the highest architectural design and standards; be attractive, robust and sustainable;

(k) Be of a scale that reflects their relevance and hierarchical importance when located within a grouping/cluster of tall buildings;

(l) Be designed to give full consideration to its form, massing and silhouette, including any cumulative impacts, and the potential impact of this on the immediate and wider context;

(m) Relate heights to widths of spaces to achieve comfortable proportions, and provide a positive edge to the public realm and a human scale through the careful treatment of ground floors and lower levels;

(n) Provide for a comfortable and pleasant microclimate which minimises wind vortices and over-shadowing;

(o) Provide for biodiversity within the building form and be sensitive to surrounding open spaces including waterways to ensure minimal impact;

(p) Take opportunities to enhance the setting of surrounding heritage assets, the overall skyline and views;

(q) Carefully consider the façade and overall detailing to ensure visual interest, vertical and horizontal rhythms, an indication of how the building is inhabited, internal thermal comfort and the visual break-up of the building visually at varying scales;

(r) Use materials and finishes that are robust, durable and of the highest quality, with facades providing innate interest, variety and function;

(s) Incorporate innovative approaches to provide high quality, usable, private and communal amenity space where residential uses are proposed; and

(t) Comply with the requirements of the Public Safety Zone."

#### 1.28. LBH Local Plan Policy 'CC4 – Heritage'

*'Our approach*

*We 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.*

*We will achieve this by*

*(a) Collating a borough-wide Heritage Strategy to guide a long-term, ambitious strategy for the continued conservation, enhancement and enjoyment of the significance of the borough's heritage assets, in consultation with the borough's local history societies and residents;*

*(b) Conserving and taking opportunities to enhance the significance of the borough's network of designated and non-designated heritage assets and their settings, identifying new assets where appropriate and recognising the cumulative positive impact of heritage assets in a given area in consultation with the borough's local history societies and residents. We will use Article 4 directions where appropriate to enhance conservation of character or fabric;*

*(c) Promoting heritage-led regeneration, particularly where this brings long term value and sense of place to development, such as in our town centres and along the Golden Mile.*

*We will aim to secure the regeneration of heritage assets at risk, including those within Gunnersbury Park, Hanworth Park, Boston Manor House and the former Hounslow Powder Mills sites;*

*(d) Working with Royal Botanic Gardens Kew World Heritage Site, London Borough of Richmond and Historic England to conserve and enhance the outstanding universal values of The Royal Botanical Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from this asset. This includes assisting in the implementation of the World Heritage Site Management Plan;*

*(e) Promoting the appropriate re-use of historic buildings and supporting schemes that conserve the significance of, and provide the heritage asset with a sustainable, long-term use;*

*(f) Working with our network of partners to ensure the borough's heritage is accessible, appreciated, valued and enjoyed by residents, workers and visitors;*

*(g) Conserving and enhancing the strategic and local views identified in the Urban Context and Character Study that give the borough its character, visual richness and coherence; and by maintaining and updating a schedule of views; and*

*(h) Conserving and enhancing the borough's beneficial and historic landmarks identified in the Urban Context and Character Study, which provide a strong visual and physical presence in the townscape.*

*We will expect development proposals to*

*(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;*

- (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.

#### Buildings and structures

- (n) In the case of alterations, extensions or changes of use of a heritage asset a proposal should demonstrate that:
- It is in keeping with the character of the building and harmonious with its surroundings and the wider character of the area; and, with particular respect to listed buildings or identified aspects of locally listed buildings, it preserves their special architectural or historic character and any features they may possess;
  - It is of a high quality design and sympathetic in terms of scale and form to the original building and in the use of materials and other details to the period and style of the original building;
  - Opportunities to mitigate or adapt to climate change through the re-use or adaptation are maximised as long as this is not to the detriment of important aspects of character;
  - That it maintains the character of interiors and retain internal features of interest including layouts, methods and means of construction where these are important;
  - That the original use is no longer viable and the benefits of the proposed use are demonstrated and would be in keeping with the character of the area; and
  - That a record is made and submitted of features of interest found, to be maintained and extended during works. Sustainability and salvage aspects should be factored into proposals.

#### Conservation areas

- (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; and
- (p) Retain and reuse any building in a conservation area which makes or can be adapted to make a positive contribution to the character of the area. Where a building makes little contribution to the area, consent for demolition will not be given unless there are approved plans for redevelopment or reuse of the land which will conserve and enhance the character of the area. Sustainability and salvage aspects should be factored into proposals.

#### World Heritage Site

- (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.

#### Sites of archaeological importance

- (r) We will expect the development proposal to submit an Archaeological Evaluation Report
- if the proposal falls within or adjacent to an Archaeological Priority Area;
- (s) We may require that an on-site assessment by trial work (archaeological field evaluation) is carried out before any decision on the planning application is taken; and
- (t) We will require any nationally important remains and their settings to be preserved permanently in situ, subject to consultation with Historic England as the borough's archaeological adviser. If preservation in situ is required the development proposal will need to accommodate this in the design.

#### Scheduled ancient monuments

- (u) Conserve and enhance a scheduled ancient monument and its setting if affected. Proposals must assess and submit an evaluation report if the proposal affects a scheduled ancient monument.

#### Strategic and local views

- (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.

#### Registered parks and gardens

- (w) Consider adding to the list and encouraging preservation and enhancement through appropriate management measures.

#### Listed Buildings at Risk

- (x) Continue to assist with Historic England's Register of Heritage at Risk, adding items where necessary but seeking their removal by developing a proactive strategy for working with owners to ensure the continued conservation of the significance of the boroughs heritage assets."

1.29. LBH committed in the Local Plan (Policy SV1) to conduct an area review to look in detail at local improvements, investment and development opportunities to provide housing and jobs in the Great West Corridor (Golden Mile). The Draft Consultation Great West Corridor Local Plan review (Great West Corridor Plan (GWCP) was published for consultation in July 2019 and contains draft policies of relevance to the proposed development.

1.30. LBH GWCP draft Policy 'GWC5: Design and Heritage'

#### How we are going to achieve this

##### "Our Approach

The Council will create a strong sense of place and identity for the Great West Corridor, through a strong urban design-led approach which seeks to knit the Great West Corridor well, into its surroundings, whilst protecting and enhancing heritage assets within the Corridor and in the wider area around it, and also creating a memorable journey for those visiting, living and working within the Corridor.

We will achieve this by:

a) Working with developers and partners including through the use of a Design Review Panel to create good, liveable holistic places to establish a series of interconnected local places with their own strong characters and identities that build on their strengths, heritage and special features, as well as distinctively express their role and function, through the scale and form of buildings, the quality of open spaces and the mix of their uses and activities.

b) Making best use of redevelopment opportunities whilst respecting and enhancing the area's distinctive character and historic environment.

c) Supporting Heritage trails, and other community-led initiatives that aim to celebrate and enhance the awareness of the area's history, and foster its identity, its sense of belonging and encourage opportunities for informal recreation.

d) Promoting positive enhancements to the quality of the public realm with well-designed and generous pavements, landscaping, tree planting, a consistent palette of materials, furniture, public art, signage and lighting, as well as enhancements to the underside of the elevated M4 in line with the emerging public realm strategy.

e) Supporting the creation of public squares at key locations which can help deliver a strong sense of place to the area with a welcoming and vibrant character that offer respite from the busy A4, M4 and railway corridors.

The Council will expect development proposals to:

f) Bring heritage assets back into meaningful use where they have been left empty, abandoned or underused, including using enabling development where appropriate.

g) Respond to the area's sensitive heritage locations and important views and accord with Great West Corridor Masterplan heights framework which identifies:

I. general building height parameters of 12 to 24 metres where appropriate to its context

II. clusters of (modestly scaled) tall buildings grouped around the focal buildings and ranging from 38 to 66 metres (AOD) where appropriate to establish a coordinated and distinct skyline, preserve long views and the open character of the remainder of the skyline at West Cross Campus Cluster, River Brent Cluster, London Gateway Cluster, Central Corridor Cluster, Brentford Stadium Clusters East and West (see figure below)

III. focal buildings with heights parameters of 61 to 82 metres (AOD) where appropriate at Golden Mile Station, Brent River Quarter, The Mille site, Phoenix site, Lionel

Road Station, Capital Interchange Way, Chiswick Roundabout, Grant Way and MacFarlane Lane

h) Design schemes that avoid any further harm to the setting and significance of the Royal Botanic Gardens, Kew WHS and other high value designated heritage assets in the Corridor and wider area around it

i) Include good design measures to optimise land use and mitigate against potential impacts between co-location of employment and residential uses in line with the Agent of Change principle.

j) Be subject to a high quality and comprehensive design review process

resulting in high quality design outcomes, proposals need to demonstrate that it:

I. has a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form;

II. is of the highest quality of architectural design and materials with an appropriate form and silhouette which contributes positively to the built heritage and image of the borough;

III. has had full regard to the significance of designated and non-designated heritage assets including the setting of, and views to and from, such assets, has no unacceptable harmful impacts, and should comply with Historic England guidance on tall buildings;

IV. interacts positively to the public realm and contributes to the permeability of the area;

V. is of a sustainable design and construction, including minimising energy use and the risk of overheating through passive design measures, and the design allows for adaptation of the space;

VI. has had full regard to circular economy principles in the design and implementation of energy (including heating and cooling), water and waste infrastructure as set out in new draft London Plan

VII. does not have a detrimental impact on the local environment in terms of microclimate, overshadowing, light spillage and vehicle movements;

VIII. respects the principles of Accessible and Inclusive Design and Secured by Design

IX. comprehensively design to ensure that tall buildings in clusters are not all built to the same height but create a variety of heights within the guide heights to support a lively skyline;

X. has an appropriate design at the base of tall buildings which provides ground floor activity;

k) Provide a balanced approach between security and design of development that maximises buildings' resilience and fire safety in accordance with the latest Building Regulations and London Plan policies. Applications for development above 25 metres containing 1 or more flats should submit the outcomes of Gateway one consultation with a Joint Competence Authority.

l) Contribute positively to the delivery of Healthy Streets and a high quality, inclusive, accessible and coordinated multi-functional public squares and public realm by

I. ensuring the design of the public realm is an integral part of the scheme's design;

II. ensuring a coordinated approach between sites to provide setbacks and maintain a consistent building line to improve existing public realm and provide new public realm that facilitate soft landscaping, urban greening and better animation of street scape.

III. delivering public realm and its component elements that respond to and enhance positive aspects of the character of the area and activate unused land such as the underside of M4 viaduct

IV. Requiring a well-designed public square at key locations, sheltered from road noise, have a sunny aspect, offer a range of public space amenities, be overlooked by development and animated by active ground floor uses

V. supporting the activation of the public realm through maximising the use of positive and / or active frontages;

VI. using coordinated high-quality durable, adaptable and sustainable materials, finishes and details;

m) Deliver a high standard of design of advertisements, which should be in scale and in keeping with the character of their location and should not have an unacceptable impact on road safety or negatively impact the townscape (visual clutter) and the human scale of the public realm. In terms of. Standalone totems/monolith features and advertisements on buildings will be resisted and the Council will seek signage and advertising features that are of appropriate scale and innovatively incorporated into the building elevations."

1.31. LBH GWCP draft Policy: 'P1'

*"Our Approach*

*Proposals should plan positively to deliver the place vision by:*

*Design and Heritage*

m) Requiring new development to preserve and enhance the listed Art Deco buildings and structures in the area, including their setting and distinctive frontages, to bring them back into use, to give them due prominence and to improve the surrounding public realm, including the landmark Gillette Building, Coty Cosmetics building (now Syon Clinic), JC Decaux building, and the central gates, gate piers and railings to the former Firestone Factory.

n) Supporting development that respond to the area's sensitive heritage locations and important views by delivering:

I. general building height parameters of 12 - 24 metres where appropriate to its local context,

II. Clusters of (modestly scaled) taller buildings with varying height parameters of 51 – 61m (AOD) in the West Cross Campus Cluster (shown in Figure below)

III. Focal building height parameters of up to 82metres (AOD) adjacent to the Golden Mile Station and 64m (AOD) at Gillette (shown in figure below)

o) Supporting development that deliver design excellence and contribute positively to creating a strong sense of place whilst responding sensitively to the area's heritage assets. The Design of tall buildings will be required to be of an exemplary standard and follow the criteria set out in Great West Corridor Masterplan and Policy GWC5

p) Supporting new development along the Great West Road with active frontages and adequate landscaping along the frontage consistent with that of the former Coty Cosmetics building (now Syon Clinic) and JC Decaux building and to establish a defined streetscape with a stronger sense of enclosure.

q) Supporting the creation of an attractive arrival square to the south west of the proposed Golden Mile Station, with active ground floor A1 – A4 retail uses.

r) Creating an attractive new diagonal street connecting the Sky Campus to the proposed 'Golden Mile' Station with active ground-floor frontages and a green space at the heart of the West Cross Campus."

1.32. LBH's Local Plan recognises 'local views' within the spatial strategy diagrams for the ten districts within the borough, however no local views are identified within Brentford. Two local views are established within Osterley Park and four local views are located alongside the historic riverside of Isleworth.

1.33. LBH's Urban Context and Character Study (2014) recognises further views associated within the ten districts within the borough and establishes that the grade II listed Gillette Building clock tower is a major landmark at the eastern gateway into the Great Western Corridor.

[Supporting Evidence Base Documents](#)

[GREAT WEST CORRIDOR MASTERPLAN AND CAPACITY STUDY \(MARCH 2019\)](#)

1.34. The GWC Masterplan establishes a vision and spatial framework for the Great West Corridor and locates the site in the West Cross Quarter. Concerning the site, it states: *The Tesco Site with its large surface car park presents a significant opportunity for intensification.*

*The masterplan retains the current store in situ and proposes residential development on part of its car park. This would provide an edge with new housing to the west of the store and the wrapping of the store and its servicing yard with residential development on the east towards Grant Way. This creates a better enclosed and animated environment at the entrance into the Sky campus (Grant Way) and provides definition and overlooking to MacFarlane Lane which leads to the proposed Bolder Academy. Additional store parking could be provided in a podium beneath and wrapped by residential development. The green space to the rear of the store would be enhanced and accommodate a direct pedestrian link that forms part of the pedestrian route between the Bolder Academy and the Golden Mile Station. This project could be realised with the Tesco Store continuing trading during the development. However it does not bring comprehensive change to the area, and as it retains a large portion of surface car parking it does not make the most efficient use of land.*

*The masterplan has explored an alternative development scenario for the Tesco site. This would require the relocation of the superstore to an alternative location nearby. One potential location could be the Homebase Site on Syon Lane, where an efficient new store stacked above parking and wrapped by residential uses could be developed. Relocating the Tesco store would free up a large site for comprehensive redevelopment with a sizable new residential quarter.*

*Development could be structured by urban street blocks arranged around an internal green space that would give the area its identity and offer amenities to residents. This scenario could provide a high quality living environment with a mix of units including for families located close to facilities, public transport, schools and open spaces.*

*This development scenario could establish defined building frontages towards Grant Way, Syon Lane and MacFarlane Lane, and accommodate legible walking routes across the development to facilitate access to both schools from the Golden Mile Station link. Development height and form should respond sensitively to the neighbouring Grade II*

listed Gillette Factory and not compete with or detract from its iconic clock tower in local views.

*This alternative scenario would deliver benefits as it brings comprehensive change, makes more efficient use of land and delivers more housing. It also offers a strong placemaking potential in line with the wider vision for the area.*

- 1.35. Great West Corridor Appendix: View Assessment (March 2019) complements the Great West Corridor Masterplan and Capacity Study and comprises background studies and height testing undertaken in support of the masterplan.
- 1.36. Seven LBH Conservation Areas are located within 2 km of the site and local views are identified in several of the Conservation Area appraisals:  
Grand Union Canal & Boston Manor Conservation Area Appraisal establishes that *“The character and quality of the conservation area is greatly enhanced by its rich variety and extent of waterways and green open spaces, which create dynamic views in many places”*  
Isleworth Riverside Conservation Area Appraisal identifies the *“The most picturesque view of this part of the village [Isleworth Riverside] is from the river and from Kew Gardens, with the trees, Syon House, the rebuilt church and churchyard, ribbon of houses, and public house, and buildings around the curve until hidden by the tree-covered island of Isleworth Ait. The curve provides a similar view, particularly of the church tower, from the Isleworth river edge further (south) west.”*  
Osterley Park Conservation Area Appraisal establishes the *“potential erosion of long-distance views from as well as of the Park”*.
- 1.37. The London Borough of Richmond upon Thames (LBRuT) establishes local views and landmarks within their Proposal Maps, several of which are relevant to the Site, namely the view from The River Thames Path; the vista from Syon Vista/ Cedar Vista west; and the vista from the A316.
- 1.38. LBRuT also discuss views within their conservation area statements and the following conservation areas are located within 2 km of the Site:  
Royal Botanic Gardens, Kew Conservation Area Appraisal identifies the *“finely framed view towards Syon House”*  
  
The Old Deer Park Conservation Area Appraisal does not identify any specific views but recognises development pressure which may *“harm the balance of the river and landscape dominated setting, and the obstruction or spoiling of views, skylines and landmarks”*.
- 1.39. The Royal Botanic Gardens, Kew World Heritage Site Management Plan sets out a framework for the management of the World Heritage Site (WHS) to ensure conservation of its Outstanding Universal Value and defines a buffer zone for the WHS.

- 1.40. Figure 4 of the plan identifies formal or designed views and vistas, none of which are directly orientated towards the site. Figure 5 goes onto establish present day views out which includes the following views that are oriented towards the site:
- Syon Vista
  - Unnamed Gate
- 1.41. Figure 6 of the Royal Botanic Gardens World Heritage Site Management Plan establishes the Syon Vista Terrace as:  
*“the last substantial remnant of the open relationship that Richmond Gardens once had with the Thames, through both the famous Terrace in Queen Caroline’s garden and through Capability Brown’s later visual unification of Richmond Gardens, Syon Park and the Thames in between into one seamless design. It is a key space in terms of maintaining and understanding the visual connections between RBG Kew, Syon Park and the Thames”*
- 1.42. The Thames Landscape Strategy is a 100-year blueprint and landscape strategy for the River Thames between Hampton and Kew and it identifies vistas between the river’s landmarks, two of which are relevant to the site.
- o Vista from the A316 and;
  - o Vista from the King’s Observatory to Syon House

#### Emerging Planning Policy

- 1.43. The Intend to Publish (ItP) London Plan (December 2019) is a material consideration in planning decisions since it is anticipated that it will be adopted in 2020; it provides a strategic plan which will shape how London evolves and develops over the next 20-25 years.
- 1.44. Chapter 3 Design contains policies relevant to townscape and visual matters.
- 1.45. The supporting text for Policy ‘D1 –London’s form, character and capacity for growth’ in paragraph 3.1.7 recognises that:  
*“As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place’s distinctive character, recognising that not all elements of a place are special and valued.”*
- 1.46. Policy ‘D3 – Optimising site capacity through the design-led approach’ recognises that development design should (in summary):  
*“enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and*

proportions” and

*“respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character; and*

*“be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.”*

- 1.47. Further relevant policies within Chapter 3 include Policy ‘D9 - Tall Buildings’ which states that tall buildings should be part of a plan-led approach and that local authorities should identify in Development Plans locations where tall buildings are appropriate in principle and indicate general building heights that would be appropriate. Policy D9 puts the onus on London Boroughs to define what constitutes a tall building in their Development Plans. It states that:

*“Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London”.*

- 1.48. Where a local definition of tall buildings has not been determined, the Tall Buildings policy applies to buildings over 25m in the Thames Policy Area, and above 30m elsewhere in London.

- 1.49. Policy D9 - C identifies the following impact criteria that will determine the appropriateness of a location for tall buildings:

- Contribute to skyline and not adversely affect strategic views;
- Reinforce the spatial hierarchy of the local and wider context;
- Assist legibility and wayfinding;
- Respect heritage and preserve the Outstanding Universal Value (OUV) of World Heritage Sites;
- Be of exemplary architectural quality;
- Be supported by transport and social infrastructure;
- Maximise economic and regeneration benefits.

- 1.50. In Chapter 7 of the Intend to Publish London Plan, Policies ‘HC3 – Strategic and Local Views’ and ‘HC4 – London View Management Framework’ consider development proposals within both strategic and borough views. The Mayor has identified Strategic Views and Strategically Important Landmarks which fall within the views and 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. Supplementary Planning Guidance on the management of the designated views – the London View Management Framework Supplementary Planning Guidance (LVMF SPG) - seeks to designate, protect and manage views of London and some of its major landmarks,

however the Site does not fall within any of the 27 identified strategic views.

- 1.51. Policy ‘HC3’ also requires that Boroughs should clearly identify local views in their Local Plans and strategies.

- 1.52. The recommended approach to development in the Great West Corridor is stated in the Intend to Publish London Plan as follows:

*“The Great West Corridor is one of London’s key approaches and presents unique opportunities for place-making. It inspired high-quality Art Deco architecture in the 1930s, creating a distinctive local character. The route is surrounded by some of London’s most significant historic landscapes including the River Thames, Syon Park, Gunnersbury Park, Osterley Park and The Royal Botanic Gardens Kew World Heritage Site. Masterplanning in the corridor should carefully consider these natural and historic assets, utilising the latest modelling techniques. The opportunities to integrate and draw inspiration from the area’s heritage should be fully explored.”*

- 1.53. Policy ‘SD1 – Opportunity Areas’ of the Intend to Publish London Plan identifies the Great West Corridor as an Opportunity Area describing it as:

*“one of London’s key approaches, presenting unique opportunities for place-making. It inspired high-quality Art Deco architecture in the 1930s, creating a distinctive local character. The route is surrounded by some of London’s most significant historic landscapes ... Masterplanning in the corridor should carefully consider these natural and historic assets, utilising the latest modelling techniques. The opportunities to integrate and draw inspiration from the area’s heritage should be fully explored.”*

#### Technical Standards and Guidance

- 1.54. The TVIA is based on the methodology set out in the:

- GLVIA3
- GLA Shaping Neighbourhoods: Character and Context SPG
- An Approach to Landscape Character Assessment

- 1.55. GLVIA3 was written in collaboration between the Landscape Institute and the Institute of Environmental Management and Assessment (IEMA) and was published in April 2013. It provides detailed advice on the process of assessing the townscape and visual effects of developments and their significance.

- 1.56. The Character and Context SPG (2013) sets out an approach and process to help understand the character and context of a place to help inform the planning and design process, and guide change in a way which is responsive to individual places and locations.

1.57. Natural England published 'An Approach to Landscape Character Assessment' in October 2014. It provides guidance on preparing character assessments and establishes approaches to desk-top and field studies. It recognises the importance of capturing the combination of elements that make a particular contribution to creating a distinctive character.

**APPENDIX 1.2:**

**TVIA Assessment Methodology**

## APPENDIX 1.2 TVIA ASSESSMENT METHODOLOGY

## Determination of Baseline Conditions

1.1 Preliminary desk studies were undertaken to establish the physical components of the public realm, building form and mass, vegetation, topography and land use of the site and its surroundings to inform the townscape receptors assessment. Ordnance Survey (OS) maps were utilised to identify these features, supplemented by aerial photography.

1.2 Field studies were undertaken by urban design specialists from Arc in March, July and September 2019. Features of the site and its surrounding area were identified along with the visual receptors established in the desk study. The field studies also involved travelling throughout the study area and producing a photographic record.

## Baseline Townscape Assessment

1.3 The baseline assessment of townscape receptors effects includes a mixture of desk study and field work to identify and record the character of the townscape. This includes a summary of associated elements, features and aesthetic and perceptual factors which contribute to the townscape. Once these factors are established the townscape receptors and their associated key characteristics are identified. Consideration has also been given to the London Borough of Hounslow (LBH) Urban Character and Context Study (2014) and the draft Great West Corridor Masterplan (2019).

1.4 An understanding of distinct character areas which share common features and characteristics has been gained through providing a concise description of the existing townscape situation (such as land form, land use, movement and urban grain). These areas have recognisable patterns of elements, which together create the particular sense of place for the site and the surrounding townscape.

1.5 The value attached to these townscape receptors is then considered and assessed using the criteria set out in Table 1.1. This is based on and accounts for whether the area in question is covered by a townscape designation at a national, regional or local level. Good practice guidance states that undesignated landscapes and townscapes do, under certain circumstances, have value and should be judged drawing upon the following list:

- Landscape, or townscape, quality and scenic quality;
- Rarity and representativeness – presence of a rare or important element or feature;
- Conservation interest – presence of wildlife, earth science or archaeology or historical and cultural interest;
- Recreational value;
- Perceptual aspects – notably wildness and/or tranquillity; and
- Associations - with people or events that contribute to perceptions of natural beauty.

Value	Typical Criteria	Typical Scale of Importance/Rarity	Typical Examples
Exceptional	High importance and rarity. No or limited potential for substitution.	International, National	World Heritage Site.
High	High importance and rarity. Limited potential for substitution.	National, Regional, Local	National Park, Area of Outstanding Natural Beauty (AONB), and/or typically an area containing Conservation Areas, a high proportion of listed buildings, and/or listed buildings, Registered Parks and Gardens.
Medium	Moderate importance and rarity. Limited potential for substitution.	Regional, Local	Undesignated areas but value expressed through non-official publications and/or demonstrable use and/or local listing.
Low	Minor importance and rarity. Considerable potential for substitution.	Local	Areas identified as having some redeeming feature or features and possibly identified for improvement.
Poor	Minor importance and rarity.	Local	Areas identified for recovery.

## Baseline Visual Assessment

1.6 The baseline assessment of visual effects establishes the area in which the site and the proposed development may be visible; the different groups of people who may experience the views of the proposed development; and the areas where views can or are likely to be possible; and the nature of these views. These factors interrelate, but for the purpose of the assessment are dealt with in that order.

1.7 The broad Zone of Theoretical Visibility (ZTV) has been identified using both a desktop study of mapping information and fieldwork to interpret views to the site. It was considered that a bare earth, computer-generated ZTV would not provide an accurate illustration of the potential visibility of the proposed development due to the quantum of intervening visual barriers. Within this ZTV the groups of people who are likely to experience views to the site have been identified and their associated viewing points, or features, have been referred to within the assessment as visual receptors (such as residential properties, employment areas, public highways, public rights of way, areas of open space and formally identified viewpoints).

1.8 25 representative views have been identified and they have been tested to inform design development of the proposed development and to support this assessment's findings. The following criteria have been used to inform the representative views selection:

- Public viewpoints;
- Public highways;
- Townscape or transport nodes;
- Heritage features;
- Open spaces;
- Where the proposed development might be prominent, or visible from concentrations of residential properties;
- Places where people work; and
- Any other sensitive receptors.

1.9 The locations of the representative views were provided to LBH for consideration in the scoping report submitted in July 2019; no comment was made on the proposed view locations in the scoping response from LBH dated 11 October 2019.

1.10 The evaluation of the identified representative viewpoints has taken into account the following characteristics:

- Type and relative numbers of people, and their occupation or activity;
- Location, nature and characteristics;
- Nature, composition and characteristics of the views (including direction); and
- Elements which may interrupt, filter or otherwise influence the views.

1.11 The distance from the site was also considered within the following definitions: adjacent; short being 1-to 500 metres; medium being 500 m to 1 km; and long being 1 km plus. Aspects of this evaluation are discussed below and have informed the 'susceptibility of the visual receptor to change', when the predicted significant impacts are considered.

*Extent and Proportion of Visibility*

1.12 The extent of visibility of the site from the identified visual receptor representative viewpoints is considered in light of the following criteria which identify the proportion of the site visible from each viewpoint:

- No View - The site is not visible (or difficult to perceive).
- Glimpse - The site, or proposed development, has an obscured (e.g. by intervening vegetation or built form) view or distant view of part of the context in the wider view.
- Partial - A clear view of part of the site or proposed development; a partial view of most of it; or a distant view in which it forms a major proportion of a wider view.
- Open - A panoramic view of most of the site or proposed development, occupying most of the field of vision.

*Value Attached to the View*

1.13 The value attached to the visual receptor representative views is based upon the criteria set out in Table 1.2. This takes into account:

- Existing recognition of the value of the view (through identification under a designated heritage asset, or through planning policy); and
- Indicators of the value attached to views by visitors (through identification in guidebooks or on tourist maps, and reference in literature and art).

Value	Criteria
Exceptional	The view from the representative viewpoint is: highly exceptional nature, identified with a designated heritage asset, or a planning policy designation; and/or mentioned in a number of guidebooks or on tourist maps; and/or referenced in art and literature.
High	Where the views have a generally high scenic value. The view may be within, from or towards a designated heritage asset, or a planning policy designation; and/or mentioned in a number of guidebooks or on tourist maps; and/or referenced in art and literature but there may be some incongruous features or elements within in the view.
Medium	The view from the representative viewpoint has a view of scenic value, with moderate local importance and scenic quality; it is typically identified to a heritage asset; and/or of local visual amenity importance. Limited potential for substitution of some elements within the view
Low	The view from the representative viewpoint is not related to designated, or non-designated, heritage asset, or a planning designation; and/or mentioned in a guidebooks or on tourist maps; and/or referenced in art and literature; and/or of little visual amenity importance. Considerable potential for substitution of some elements in the view.
Poor	The view from the representative viewpoint is unsightly and of low importance. Considerable potential for substitution of some or all elements in the view.

*Identifying Likely Significant Effects*

1.14 The interactions between the existing townscape receptors and the visual receptors representative views identified at the baseline assessment and the components of the proposed development at various different development phases are considered at this stage of the assessment. The methodology for determining the effects of the 'demolition and construction effects' and the effects of the completed development effects are broadly the same and any differences are identified in the report.

1.15 The visual impact assessment has been informed by a series of Accurate Visual Representations (AVRs) that have been prepared for each of the visual receptors' representative views, set out in Appendix 1.3. The AVRs have been prepared through overlaying photographs from the representative viewpoints with a 3D model of the proposed development and the methodology for producing the AVRs is set out in Appendix 1.5.

*Sensitivity of Receptor*

1.16 In order to identify the sensitivity of the townscape receptors and visual receptors representative views to the proposed development, the following factors were considered:

- Susceptibility to change (as set out in Tables 1.3 and 1.4); and
- Value (as set out in Tables 1.1 and 1.2).

**Table 1.3: Townscape Receptor Susceptibility to Change to Proposed Development**

Susceptibility to Change	Criteria
High	An area possessing particularly distinctive townscape elements, characteristics or sense of place, with a few townscape detractors. A townscape with limited tolerance to change of the type proposed.
Medium	An area with some distinctive townscape elements, characteristics, or clearly defined sense of place, but with some landscape detractors. A townscape which is partially tolerant to change of the type proposed.
Low	An area with recognisable townscape character, but few distinctive townscape elements, characteristics, and some, or a number of townscape detractors. The landscape is tolerant to change of the type proposed OR the area is separated by distance or features and has little or no direct relationship with the Site and/or Development.

**Table 1.4: Visual Receptor Representative Views Susceptibility to Change to Proposed Development**

Susceptibility to Change	Criteria
High	People engaged in outdoor recreation activity such as using public rights of way whose attention is likely to be focused on the landscape/townscape or on particular views. Visitors to heritage assets or visitor attractions where views of the landscape/townscape or surroundings are an important part of the experience. Residents at home or using their gardens, or where views contribute to the townscape setting of a residential area.
Medium	People visiting retail outlets or other destinations as a leisure activity, or at a place of work, where the views to the landscape or surroundings are part of the experience OR where the receptor, normally categorised as High is located in an area of poor scenic value where the views to the surrounding area are unlikely to be the main focus of attention (e.g. walking routes to work).
Low	People engaged in outdoor sport or recreation that does not depend on an appreciation of the view.

**Table 1.4: Visual Receptor Representative Views Susceptibility to Change to Proposed Development**

	People travelling by road or rail (unless the route is specifically identified for its views). People at work or in a workplace or a place of education where the views to the landscape or surroundings are not important.
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1.17 The matrix shown in Table 1.5 broadly demonstrates how sensitivity is determined through combining the Townscape Receptor's and Visual Receptor Representative View's value with their susceptibility to change. It is important to note that this is a quantitative approach, which GLVIA3 strives to avoid, so will be linked back to evidence gathered at the baseline stage. GLVIA3 states that *"there should be more emphasis on narrative text describing the landscape and visual effects and the judgements made about their significance"* and that *"Tables and matrices should be used to support and summarise description text, not replace it"*.

**Table 1.5: Sensitivity of Townscape Receptors and Visual Receptor Representative View**

Susceptibility to Change	Value				
	Exceptional	High	Medium	Low	Poor
High	High	High	Medium to/or high	Medium	Low to/or medium
Medium	Medium to/or high	Medium to/or high	Medium	Medium to/or low	Low
Low	Medium	Medium	Low to/or medium	Low	Low

1.18 The predicted effects are a straight comparison between the existing situation and that occurring at prescribed fixed stages in the future. The effect of the proposed development will vary depending on time (i.e. demolition/construction through to completed and operational stage) with the appearance and effect of the proposed development changing with time:

- Demolition and construction effects, which include site clearance, change in land use with effects created by the construction works and the absence of long term mitigation measures; and
- Effects of the completed development, which include the effects from the first year of operation.

*Magnitude of Impact*

1.19 The magnitude of impact considers the size or scale of the proposed development, along with the geographical extent of the area influenced and its duration.

1.20 Size and scale is described within the assessment as the loss and addition of features being high, medium, low, or negligible/none. This relates to the loss or addition of particular elements; the

degree to which aesthetic or perceptual aspects of the townscape are altered; and the change to the key characteristics.

- Geographical extent is the area over which the impact will be felt and ranges from site level, to character area, and onto a larger scale;
- Duration, for the purpose of this assessment, relates to temporary (during construction) and permanent (once the proposed development is complete); and
- Nature of effect (whether direct or indirect, reversible or irreversible).

1.21 It is anticipated that construction of the proposed development would be undertaken in nine main phases, with completion after circa ten years (2025 – 2035).

1.22 The overall magnitude of impact of the proposed development on the identified townscape receptors and visual receptor representative views is defined as either being high, medium, low, very low or none and the criteria are set out in Table 1.6.

Magnitude of Impact Criteria	Definition
High	Where the proposals (or works to facilitate them) would result in the total loss or major alteration of the elements that make up the character of the baseline townscape or make up the view from a particular location. Where the introduction of elements are considered to be wholly uncharacteristic in the particular setting and/or context. Where the proposals would be experienced over a large scale and/or townscape type/character area or would be visible over a large scale and / or at close range. Loss of or major alteration to key elements / features / characteristics of the baseline. The duration of this effect may be permanent and non-reversible
Medium	Where the proposals (or works to facilitate them) would result in the partial loss or alteration of one or more of the key elements that make up the character of the baseline townscape or make up the view from a particular location. Where the introduction of new features may be prominent but not necessarily wholly uncharacteristic in the particular context. Where the proposals would be largely experienced within the townscape type/character area within which they will sit. Where the proposals would be largely seen from further afield or as only part of a view. Partial loss of or alteration to one or more key elements / features / characteristics of the baseline. The duration of this effect may be semi-permanent and partially reversible
Low	Where the proposals (or works to facilitate them) would result in minor loss or alteration of one or more of the key elements that make up the character of the baseline townscape or make up the view from a particular location. Where the introduction of elements would not generally be considered uncharacteristic in the particular setting and/or context. Where the proposal occur within other character areas or types and their introduction by virtue of distance will have limited or no effect on the baseline character area or view. Minor loss of or alteration to one or more key elements / features / characteristics of the baseline. The duration of this effect may be temporary and reversible

Very Low / None	Where the proposal (or works to facilitate it) would result in a very minor loss or alteration of one or more of the key elements that make up the character of the baseline townscape or view from a particular location. The introduction of elements that may not be uncharacteristic in the particular context Where the proposal occurs within other character areas or types and their introduction by virtue of distance will have limited or no effect on the baseline character area. Where the effects of the proposals would only be seen from a distance and be imperceptible within the context of the wider view.
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*Scale of Effects*

1.23 Effects have been assessed in relation to duration and spatial scale using the following criteria:

- Duration - 'short-' to 'medium-term' effects are considered to be those associated with the Works, and 'long-term' effects are those associated with the completed and operational development.
- Spatial scale - 'Local' effects are those affecting neighbouring receptors of the proposed development, whilst effects upon receptors within the wider Borough are considered to be at a 'District' level. 'Sub-Regional' effects are those affecting adjoining Boroughs, whilst effects upon Greater London are considered to be at a 'Regional' level. Effects upon different parts of the country, or England as a whole, would be considered to be 'National'.

1.24 The matrix shown in Table 1.7 provides a guide on how the magnitude of impact and sensitivity of the townscape receptors and visual receptor representative views are combined to provide the scale of effect. To allow a robust understanding of the effect of the proposed development on the identified townscape receptors and visual receptor representative views during the recognised stages, a supporting narrative has been provided to ensure that the resultant effects are clearly explained within the assessment.

Sensitivity of Receptor	Magnitude of Impact			
	High	Medium	Low	Very Low/ None
High	Major	Moderate to/ Major	Moderate	Negligible to/ Minor to/ None
Medium	Moderate to/ Major	Moderate	Minor to/ Moderate	None
Low	Moderate	Minor to/ Moderate	Negligible to/ Minor	None

1.25 The effects can be beneficial, adverse or neutral and the criteria applied are set out in Table 1.8. This corresponds to the extent to which the proposed development improves and has a beneficial effect, causes damage and has an adverse effect or has a neutral effect on the existing townscape receptors and visual receptor representative views. Neutral effects are those where the effect would be neither beneficial nor adverse or a balance of adverse and beneficial influences. These judgements take into account whether the proposed development:

- conforms with the pattern, scale, mass, grain and historic features of the identified townscape character;
- creates a loss or restoration of key townscape features;
- contributes to the identified townscape character;
- affects identified townscape receptors and representative viewpoints; and accords with national, regional and local planning policy and guidelines

Table 1.8: Type of Effect

Beneficial criteria – where the proposed development:
Fits comfortably within the characteristics of the townscape or visual receptor’s view. Increases characteristic features or enhances the contribution to the wider context. Improves the view or an element within the visual receptor’s view. Does not result in an incongruous feature within the prevailing pattern of townscape. Does not obstruct views towards a high quality or scenic townscape. Does not obstruct views or detracts from the visual amenity of a view towards a heritage asset. Provides ability to include adequate or appropriate mitigation. Complements local/national planning policies or guidance to protect townscape character or visual amenity or specific views.
Adverse Criteria – Where the proposed development:
Results in a change that is out of scale with surrounding townscape / landform and/or pattern of the townscape. Results in a loss of positive townscape feature or characteristics, including within a particular visual receptor’s view. Results in incongruous features within the prevailing pattern of townscape. Obstructs a view towards a high quality or scenic townscape. Obstructs views or detracts from the visual amenity of a view towards a heritage asset. Lacks ability to include adequate or appropriate mitigation. Conflicts with local/national planning policies or guidance to protect /manage townscape character or visual amenity or specific views.
Neutral Criteria – Where the proposed development:
Where the change (whatever the magnitude of impact) resulting from the proposed development will have an indiscernible effect on the character or characteristics of an area. Where the change would be imperceptible within the context of the view, due to distance or screening of built form or vegetation. Where any change will see one or more elements replaced with another of similar form/extent so as to result in an effect to the character or view that on balance is neither positive or negative. Where the proposal has an equal balance of positive or negative influences on the character or view.

1.26 The significance of effect on townscape and representative viewpoints has been determined by considering their sensitivity with the likely magnitude of impact of the proposed development. It is considered that ‘major’ to ‘moderate’ scale of effects are significant and ‘moderate to minor’, ‘minor’ to ‘negligible’ significance of effects are not significant. Effects that are assessed to be not significant are not disregarded and are still considered within this TVIA.

*Cumulative Assessment*

- 1.27 The inter-project cumulative townscape and visual effects of the proposed development with identified cumulative committed schemes has also been assessed.
- 1.28 The assessment of cumulative construction effects has considered the worst case scenario i.e. that the construction of the cumulative schemes and the proposed development occur at the same time.
- 1.29 The assessment of cumulative operational effects did not seek to re-assess aspects of design quality of the cumulative schemes. Instead it focussed on the effects relating to matters such as scale, mass and the magnitude of the combined cumulative change on the townscape receptor and visual receptor’s representative views.
- 1.30 Cumulative effects have not been established where the proposed development continues to have no effect on the identified receptor.

**APPENDIX 1.3:**  
**Visual Impact Assessment**

APPENDIX 1.3 VISUAL IMPACT ASSESSMENT

- 1.1 A number of representative views have been identified to recognise and assess the likely visual and townscape effects of the proposed development. These have been agreed during pre-application consultation with officers at LBH.
- 1.2 In identifying the representative views, consideration has been given to view-associated planning policy of the London Plan; the Intend to Publish London Plan; LBH Local Plan 2015-2030; LBH's Urban Context and Character Study; relevant Conservation Area Appraisals; LBH's Great West Corridor: Appendix View Assessment (March 2019); LBRuT Proposal Maps; the Thames Landscape Strategy (1994 and 2012 review); and the Royal Botanic Gardens World Heritage Site Management Plan.
- 1.3 An Accurate Visual Representation (AVR) has been prepared by AVR London for each of these representative views and the associated methodology for how these are produced is provided in Technical Appendix 1.5, which should be read in conjunction with this appendix. The AVRs have been prepared using a three-dimensional model of the maximum heights as shown in the Maximum Building Heights Parameter Plan (ref JTP-DR-MP-PP-003).
- 1.4 The AVRs provide two-dimensional representations of a complex scenic experience and as such are indicative. They have, however, been selected to give an impression of the maximum effect of the proposed development in the viewing experience. These views are kinetic and variable in nature when experienced within the townscape.
- 1.5 The imagery is no substitute for the actual visual experience from a representative view. It is essential when considering these views that the individual is aware of the viewing experience at each location and of traffic noise, weather, the surrounding buildings and any other similar matters. It is therefore recommended that this document is taken on site to fully appreciate the nature of the viewing experience from each representative view location.
- 1.6 Within the AVRs, each parcel of the proposed development is shown in a different colour (see Figure 1.1 of this appendix) to differentiate them. Where the buildings fall behind built form, or significant vegetation, the proposed development's mass has been shown with a dash demonstrating that it is unlikely to be seen within the view.
- 1.7 Nine cumulative schemes were identified in the scoping report. For each representative view, a second AVR has been prepared which includes the cumulative schemes as appropriate. The approved schemes are shown as magenta wirelines within the AVRs and cumulative scheme ref. 9, which is not approved, as a cyan wireline. When more than one cumulative scheme is present within a view, they have been described in the order in which they present from left to right. The cumulative schemes are summarised in Table 1.1.

Table 1.1: Cumulative Schemes			
Reference	Scheme Name and Application Number	Planning Status	Approximate distance from site
1	New Horizons Court, Ryan Drive, Brentford, TW8 9EP (Ref: 02912/A/PA2, APP/F5540/W/16/3165799)	Approved 4 July 2017	300 m
2	4 and 8 Harlequin Avenue, Brentford, TW8 9EW (Ref: 00558/4-8/P1)	Approved 21 December 2018	175 m
3	1 Commerce Road, Brentford, London, TW8 8LE (Ref: 00297/H/P13)	Approved on 10 January 2019	1.12 km
4/5	891 Great West Road, Isleworth London TW7 5PD (Ref: 00505/891/P4_P5)	Allowed on appeal 4 April 2019	200 m
6	Former Syon Gate Service Station, Land at South of Gillette Corner, Great West Road, Isleworth TW7 5NP (Ref: 00505/AF/P28)	Approved at Planning Committee 2 May 2019	220 m
7	Sky, Sites 6 & 7, Grant Way, Isleworth TW7 5QD (Ref: 00558/A/P69)	Approved on 4 September 2019	140 m
8	Bolder Academy, 1 MacFarlane Lane, Isleworth, TW7 5PN (Ref: 01106/W/P9)	Approved on 4 September 2019	270 m
9	Homebase, Syon Lane, Isleworth TW7 5NZ (Ref: TBC)	Submitted August 2020	255 m

- 1.8 Technical Appendix 1.6. provides illustrative rendered views for representative views 8, 13, 14 and 15. These have been prepared using design information from the Design Code and illustrate how the proposed development could appear in the view from these locations

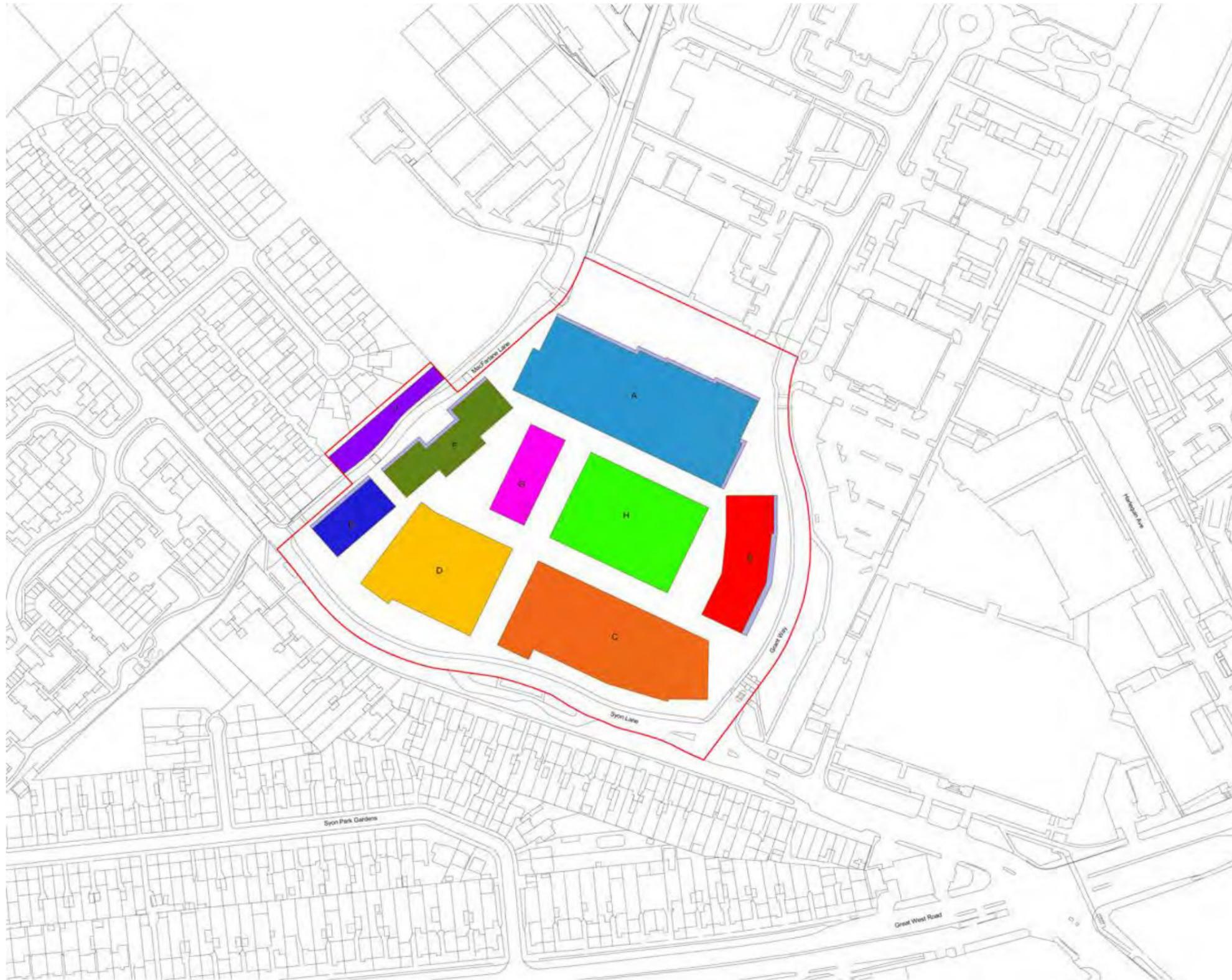


Figure 2.1 Development Parcels

View 01 Syon Lane Station

VIEWPOINT MAP



Baseline Conditions

1.9 This representative view is situated at the exit of Syon Lane Station, on the western pavement of Syon Lane, approximately 445 m to the south-west of the site.

1.10 To the west (left) of the view a brick wall associated with the bridge over the railway can be seen, whilst evergreen vegetation prevents a view to the semi-detached, residential properties which line the western side of Syon Lane. To the east (right) of the view, vegetation screens views of the Homebase store; signage for the Homebase store is visible above the intervening vegetation.

1.11 Significant street furniture and telecommunications infrastructure such as signage, a mobile phone mast traffic lights and bus stops clutter the view. The Grade II listed former Gillette Factory and its clock tower can be seen in the far middle ground of the view to the northwest (centre) of the view, beyond the Great West Road (GWR). The Gillette building is identified as a heritage asset sensitive to potential tall buildings proposals in the LBH's GWC: Appendix View Assessment. The site is not visible in this view since it is screened by the Former Gillette Factory.



© AR LONDON

1.6 m above ground

13:50 11 March 2019

Existing

View 01 Syon Lane Station

1.12 Due to the sight lines towards the former Gillette Factory, and particularly the clock tower, the view is identified as a key vista of the listed Gillette building within LBH's GWC: Appendix View Assessment (Ref. SS01 – Gillette Factory Clock Tower). LBH's GWC: Appendix View Assessment concludes that development on the site has the potential to significantly alter the street scene in the view, and that any development should ensure the view to the Gillette tower remains intact, framing the view and providing a stronger emphasis to the clock tower.

1.13 Whilst identified within the LBH's GWC: Appendix View Assessment as a key vista, the experience of the view is influenced by the noise of vehicles using Syon Lane and the amount of visual clutter present. Overall it is considered to have a medium value, due to having local importance but there being considerable potential for substitution of some elements in the view.

Assessment of Effects

1.14 The representative view would be experienced by people moving along Syon Lane and exiting the station and is considered to have a low susceptibility to change and a low to medium sensitivity to the proposed development. The former is based on occupation or activity of people, which in the case of this view is predominately people travelling to work. The latter is based on the baseline condition's identified value combined with the susceptibility to change. The approach to determining the view's 'susceptibility to change' and 'sensitivity', is set out in the supporting methodology within Table 1.5 of Technical Appendix 1.2.

Effects during Demolition and Construction Stage

1.15 There may be intermittent glimpses of tower cranes along with a glimpsed view of the scaffolding associated with the construction of the proposed development above the roofline of the former Gillette Factory to the north of the GWR. These would be experienced in the context of the existing visual clutter and vertical elements in the view and it is considered that this would have a local, direct, medium term, temporary and low magnitude of impact. Through combining this magnitude of impact with the medium to low sensitivity the demolition and construction stage of the proposed development would have a Minor Adverse effect.

Effects during Completed Development Stage

1.16 Upper storeys of Development Parcels A, B, H and C would be visible in the background of the view, behind the former Gillette factory.



Proposed

View 01 Syon Lane Station

1.17 The former Gillette Factory's clock tower rises above the proposed development and remains the prominent feature in the view, preserving the key vista identified in LBH's GWC: Appendix View Assessment and its status as a local landmark. 2.18 The materials palette for the façade of Development Parcel A, which falls behind the clock tower in the view, is for brick in complementary colours which would ensure the proposed development recedes in the view, allowing the clock tower to be read clearly against it.

1.18 It is considered that the proposed development would have a local, direct, permanent, low magnitude of impact. This is due to the proposed development's buildings introducing built form behind the focal point of the view. Combining this magnitude of impact with the medium to low sensitivity, the proposed development would have a Minor **Beneficial** effect. It is considered that the effect would be **beneficial because the proposed development would be experienced as a complementary element of built form within the townscape, would assist in way-finding and would not obstruct views or detract from the visual amenity of the view towards the clock tower.**

Cumulative Effects during Construction Phase

1.19 The construction of the proposed development would, subject to programming and phasing, be read in conjunction with cumulative scheme ref. 6 (Former Syon Gate Service Station) which would be glimpsed on the northwest side of Syon Lane and cumulative scheme ref. 9 (Homebase, Syon Lane) which would be visible in the foreground of the view to the east of Syon Lane. The construction of the proposed development, in combination with cumulative scheme ref. 9 (Homebase, Syon Lane) would have an increased high magnitude of impact and the scale of effect would increase to **Moderate to Major** Adverse effect. **The effect would be significant.**

Cumulative Effects during Completed Development Stage

1.20 A glimpsed view would be gained to cumulative scheme ref. 6 (Former Syon Gate Service Station), whilst there would be open views of cumulative scheme ref. 9 (Home base, Syon Lane) in the foreground of the view, obscuring views of Block A of the proposed development. In combination with these cumulative schemes, the proposed development would have an increased medium to high magnitude of impact and the scale of effect would increased to **Moderate to Major Beneficial** effect. **The effect is considered to be beneficial since the proposed development fits comfortably within the view, does not result in an incongruous feature within the prevailing pattern of townscape, does not obstruct views towards a high quality or scenic townscape and does not obstruct views or detract from the visual amenity of the view towards the heritage asset.**



Cumulative

View 02 Junction of Syon Lane and Great West Road (A4)

VIEWPOINT MAP



Baseline Conditions

1.21 Situated approximately 245 m to the south of the site, this representative view illustrates the character of the GWR and its relationship with the former Gillette Factory, which is located at the junction of the GWR and Syon Lane. For this viewpoint a vertical shift lens has been used to ensure that the clock tower is accommodated within the view. For reference, the view is provided with a central horizon in Technical Appendix 1.4 of this volume. This does not alter the findings of this assessment.

1.22 The foreground is dominated by the wide carriageway of the GWR, which consists of seven vehicle lanes and two pedestrian crossing islands. This, along with the low rise built form in the middle ground, provides a relatively open view.

1.23 In the middle ground of the view, two storey, semi-detached, residential dwellings which front the carriageway and a Shell petrol service station are visible. The façade and architectural treatment of the dwellings is broadly representative of the style and age of the residential buildings within the area.

1.24 The former Gillette Factory clock tower is a dominant vertical element within the view and there is an open view of the grand main entrance to the building. The view towards the site from this location is blocked by the intervening built form.



Existing

View 02 Junction of Syon Lane and Great West Road (A4)

1.25 Notwithstanding the sight lines towards the former Gillette Factory, and particularly the clock tower, the experience of the view is influenced by the noise of vehicles using the GWR and the amount of visual clutter present. It is therefore considered to have a low value, due to there being considerable potential for substitution of some elements in the view.

Assessment of Effects

1.26 It is considered that the representative view would have a low susceptibility to change as the view is unlikely to be the main focus of attention (e.g. the road is used as a route to work through a residential area) and a low sensitivity to the proposed development.

Effects during Construction Phase

1.27 There would be glimpses of tower cranes and scaffolding associated with the construction of the proposed development above the **roofline of the former Gillette Factory**. These would be experienced in the context of the existing visual clutter in the view and it is considered that this would have a local, direct, medium term, temporary and medium to low magnitude of impact. Through combining this magnitude of impact with the low sensitivity the demolition and construction stage of the proposed development would have a Minor Adverse effect.

Effects during Completed Development Stage

1.28 The upper storeys of Blocks A, B, C and H of the proposed development would be visible in the centre of the view beyond the former Gillette Factory. Its clock tower would, however, remain the dominant feature in the view.

1.29 The varied building heights and massing of the Development Parcels provide a varied skyline and visual interest within the view and the Design Principles established within the Design Code document establish that the façade materials should be complementary to the former Gillette Factory.

1.30 The proposed development would have a local, direct, permanent, medium magnitude of impact. Therefore, through combining this magnitude of impact with the low sensitivity, the proposed development has a **Minor to Moderate Beneficial** effect.



Proposed

View 02 Junction of Syon Lane and Great West Road (A4)

Cumulative Effects during Construction Phase

1.31 None of the cumulative schemes would be visible from this viewpoint and the effect during the construction phase would therefore remain unchanged. Accordingly there will be no cumulative effect.

Cumulative Effects during Completed Development Stage

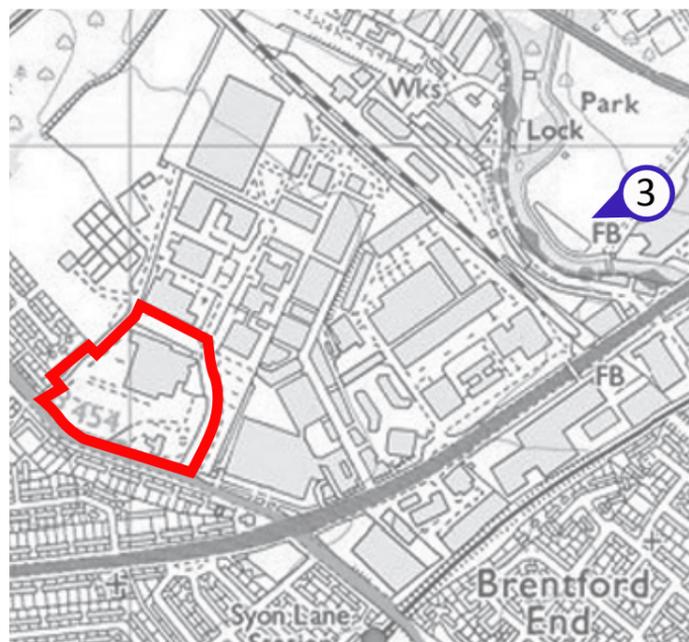
1.32 None of the cumulative schemes would be visible from this viewpoint and the effect during the operational phase would therefore remain unchanged. Accordingly there will be no cumulative effect.



Cumulative

View 03 Boston Manor Park (footpath)

VIEWPOINT MAP



Baseline Conditions

1.33 Located 785 m to the northeast of the site, this representative view is taken from a footpath within Boston Manor Park, a well-used area of public open space.

1.34 The foreground of the view is dominated by open amenity parkland with some scattered trees. Looking towards the site, the western boundary of the park is delineated by a belt of trees, which also mark the course of the River Brent. Even in winter when they are bare, the relatively dense tree cover screens views of the majority of the larger scale industrial and commercial buildings beyond. The distinctive façade of the Sky campus and the wind turbine can be seen above the trees. The site is not visible from this viewpoint.

1.35 In summer, when the trees are in leaf, visibility of the built form to the west would reduce, although the Sky wind turbine would remain a distinctive feature within this view.

1.36 Boston Manor Park falls within the Grand Union and Boston Manor Conservation Area.

1.37 There are no dominant visual detractors in the view and it is considered to have a medium value.



Existing

View 03 Boston Manor Park (footpath)

Assessment of Effects

1.38 The representative view would have a high susceptibility to change and a high to medium sensitivity to the proposed development.

Effects during Construction Phase

1.39 During the construction phase of the proposed development, there would be glimpses of tower cranes and scaffolding rising above the trees in the background of this representative view. The construction of the proposed development would have a local, direct, medium term, temporary, low magnitude of impact. Through combining this magnitude of impact with the high to medium sensitivity, it is considered that the construction stage of the proposed development would have a Minor Adverse effect.

Effects during Completed Development Stage

1.40 In the winter there would be a limited glimpsed view of the upper storeys of the proposed development's Development Parcels A, B and H above the trees which line the River Brent. They would be experienced in the context of the Sky Isleworth Campus and other existing built form and from this viewpoint appear to be of a similar height. In the summer, when the trees along the River Brent are in leaf, it is considered that the proposed development would not be visible from this viewpoint.

1.41 The proposed development would have a local, direct, permanent, very low magnitude of impact. Therefore, through combining this magnitude of impact with the high to medium sensitivity, the proposed development would have a **Negligible Neutral** effect. The effect of the proposed development is considered to be neutral because there would be an indiscernible effect on the existing visual amenity of the view.



Proposed

View 03 Boston Manor Park (footpath)

Cumulative Effects during Construction Phase

1.42 The construction of the proposed development would, subject to programming and phasing, be read in conjunction with cumulative scheme ref. 9 (Homebase, Syon Lane); the effect, in combination with this cumulative scheme, would remain unchanged.

Cumulative Effects during Completed Development Stage

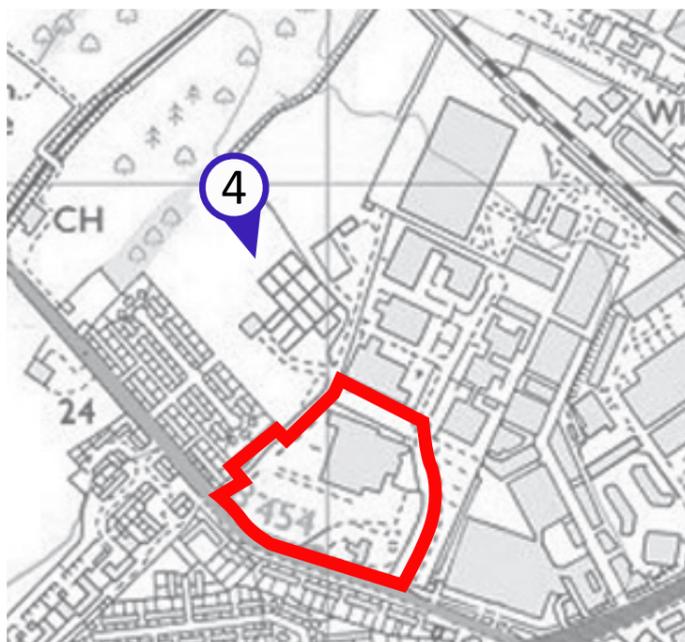
1.43 Cumulative scheme ref. 9 (Homebase, Syon Lane) would be experienced as a minor element of built form in the view in the winter months; the effect when combined with this cumulative scheme, would remain unchanged.



Cumulative

View 04 Goals Gillette Corner Sportsfield

VIEWPOINT MAP



Baseline Conditions

1.44 This representative view provides a typical townscape view from the north of the site and is situated approximately 300 m from the site. It falls within the Osterley Park Conservation Area.

1.45 The viewpoint is located within the private Goals Gillette Corner Sportsfield, which dominates the view. The distinctive pavilion, which is Grade II listed, is visible in the centre of the view. To the east (left) of the view, the former Gillette Factory clock tower can be seen rising above the intervening trees which line MacFarlane Lane.

1.46 To the west (right) of the view, residential properties on Oakland Avenue can be seen, representative of the generally lower-rise scale of the area to the north and west of the site.

1.47 Despite its proximity, the built form within the site is not visible from this location due to intervening tree cover; light columns associated with the parking area can be seen above the trees. The view has some scenic quality and looks towards the former Gillette Factory clock tower, identified as a local landmark by LBH; it is considered that the view is of medium value.



Existing

View 04 Goals Gillette Corner Sportsfield

Assessment of Effects

1.48 The representative view would have a low susceptibility to change and a medium to low sensitivity to the proposed development.

Effects during Construction Phase

1.49 An open to partial view would be gained to the tower cranes and scaffolding associated with the proposed development from this representative view. This would have a local, direct, medium term, temporary, high to medium magnitude of impact. Through combining this magnitude of impact with the medium to low sensitivity the construction stage of the proposed development would have a **Moderate** Adverse effect.

Effects during Completed Development Stage

1.50 There would be open views of the upper storeys of the proposed development from this viewpoint above the intervening tree cover. The massing steps down towards the lower rise residential properties on Oaklands Avenue, creating a sympathetic transition from the taller elements of the proposed development to the two-storey houses. The intervening trees obscure views of the lower storeys of the proposed development, providing a softer transition at ground level. While the proposed development would introduce new elements of built form **within the view**, the Design Code specifies that the material palette and articulation and façade treatment would provide interest and mitigate against the blocks appearing too dominant.

1.51 The proposed development would have a local, direct, permanent, high magnitude of impact. Therefore, through combining this magnitude of impact with the medium to low sensitivity, the proposed development has a **Moderate Beneficial** effect on the representative view.



Proposed

View 04 Goals Gillette Corner Sportsfield

Cumulative Effects during Construction Phase

1.52 The construction of the proposed development would, subject to programming and phasing, be read in conjunction with cumulative scheme ref. 9 (Homebase, Syon Lane). The effect, in combination with this cumulative scheme, would remain unchanged.

Cumulative Effects during Completed Development Stage

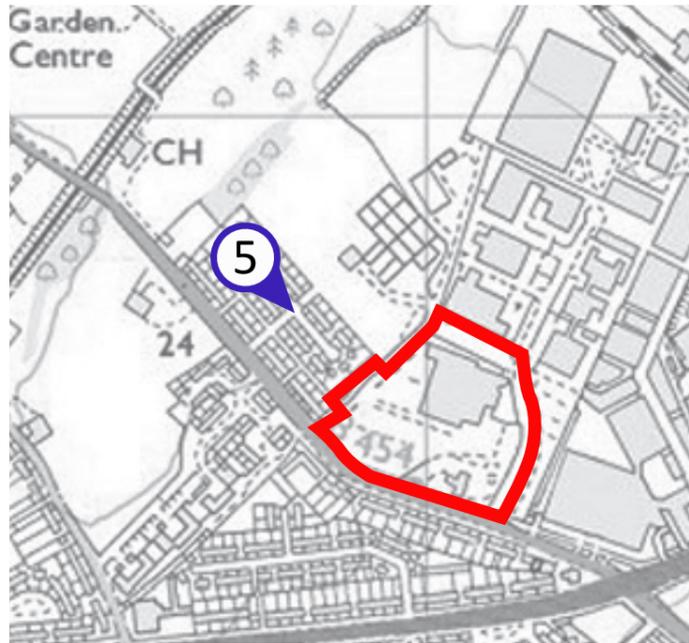
1.53 Cumulative scheme ref. 9 (Homebase, Syon Lane) would be experienced as a minor element of built form in the view and when combined with this cumulative scheme, the effect would remain unchanged.



Cumulative

View 05 Oaklands Avenue

VIEWPOINT MAP



Baseline Conditions

1.54 Positioned within the Osterley Park Conservation Area, this representative view is taken from the western pavement of Oaklands Avenue and is 120 m north west of the site boundary. It provides a typical townscape view from the residential area north of Macfarlane Lane.

1.55 The linear view is dominated by the carriageway, which is lined by occasional street trees which influence the visibility depending on the season. Oaklands Avenue is flanked by late interwar and early postwar two storey semi-detached houses; the Osterley Park Conservation Area Appraisal identifies the houses as positive contributors to the Conservation Area and identifies a view from Oaklands Avenue which encompasses the pavilion to the east and the houses.

1.56 The built form can be seen extending from the fore ground to the far middle ground of the view.

1.57 It is considered that the view is of medium value since it falls within a Conservation Area.



Existing

View 05 Oaklands Avenue

Assessment of Effects

1.58 The representative view would have a medium susceptibility to change and a medium sensitivity to the proposed development.

Effects during Construction Phase

1.59 In the background of the view, views would be possible of the scaffolding and tower cranes associated with the proposed development, rising above the roofs of the properties on Oakland Avenue. The construction of the proposed development would have a local, direct, medium term, temporary, medium term to low magnitude of impact. Through combining this magnitude of impact with the medium sensitivity, the construction stage of the proposed development has a **Minor to Moderate** Adverse effect.

Effects during Completed Development Stage

1.60 The proposed development's Blocks A, G, H and D would be visible in the background of the linear view along Oakland Avenue, **albeit that views towards them would be significantly reduced in the summer when the intervening trees lining the road are in leaf. The articulated rooflines would break up the perception of mass and the proposed development would not appear overly dominant in the views and would not detract from the existing properties, identified as positive contributors in the Osterley Park Conservation Area Appraisal.**

1.61 It is considered that there would be a local, direct, permanent, medium to low magnitude of impact. Therefore, through combining this magnitude of impact with the medium sensitivity, the proposed development has a **Minor to Moderate Neutral** effect. The effect is considered to be neutral because the change would have neither a **beneficial nor adverse effect on the character or characteristics of an area.**



Proposed

View 05 Oaklands Avenue

Cumulative Effects during Construction Phase

1.62 None of the cumulative schemes would be visible from this viewpoint and the effect during the construction phase would therefore remain unchanged.

Cumulative Effects during Completed Development Stage

1.63 None of the cumulative schemes would be visible from this viewpoint and the effect during the operational phase would therefore remain unchanged.



Cumulative

View 06 Pavement of Great West Road (A4)

VIEWPOINT MAP



Baseline Conditions

1.64 Positioned on the southern pavement of the GWR, this typical townscape view illustrates the character of this major arterial route and the residential areas which front onto it. The viewpoint is taken approximately 330 m to the south of the site.

1.65 The GWR carriageway within the view includes three vehicle lanes either side of the central reservation. The pavement to the north of the carriageway includes a grass verge with occasional tree planting and a segregated cycle path.

1.66 In the centre of the view, the view extends northwards along Syon Park Gardens. The houses facing on to the GWR are two storey, semi-detached, inter-war residential dwellings, set back slightly from the road.

1.67 This view is of poor amenity value and there is potential for substitution of many elements within it; it is therefore considered to be of poor value.



Existing

View 06 Pavement of Great West Road (A4)

Assessment of Effects

1.68 The representative view would have a low susceptibility to change and a low sensitivity to the proposed development.

Effects during Construction Phase

1.69 In the background of the view, there would be views of the scaffolding and tower cranes associated with the proposed development, rising above the rooves of the houses on Syon Park Gardens. The construction of the proposed development would have a local, direct, medium term, temporary, medium to low magnitude of impact. Through combining this magnitude of impact with the low sensitivity the construction stage of the proposed development has a Minor Adverse effect.

Effects during Completed Development Stage

1.70 Upper storeys of the proposed development would be visible in the background of the view, however they would not be experienced as incongruous elements within the wider townscape.

1.71 Overall the proposed development would have a local, direct, permanent, medium to low magnitude of impact. Therefore, through combining this magnitude of impact with the low sensitivity, the proposed development has a Minor **Beneficial** effect. The effect is **considered to be beneficial because the proposed development would fit comfortably within the visual receptor's view and would be experienced as complementary elements of built form within the townscape.**



Proposed

View 06 Pavement of Great West Road (A4)

Cumulative Effects during Construction Phase

1.72 None of the cumulative schemes would be visible from this viewpoint and the effect during the construction phase would therefore remain unchanged.

Cumulative Effects during Completed Development Stage

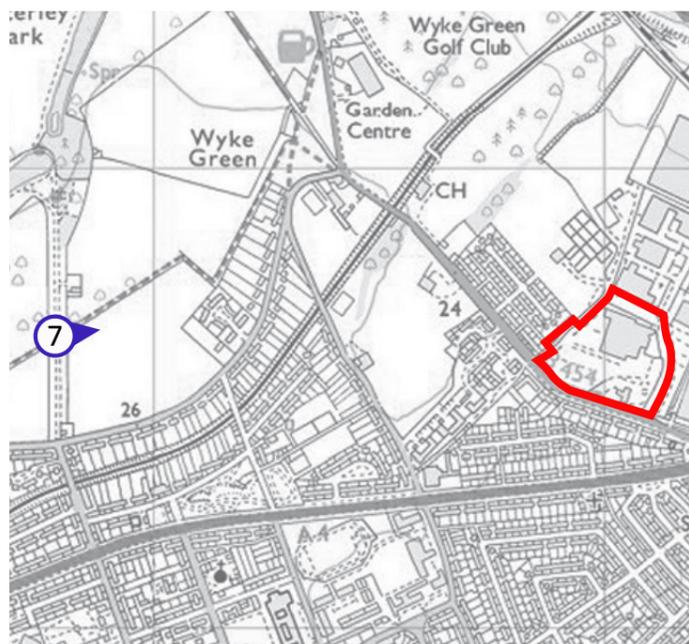
1.73 None of the cumulative schemes would be visible from this viewpoint and the effect during the operational phase would therefore remain unchanged.



Cumulative

View 07 Osterley Park (entrance)

VIEWPOINT MAP



Baseline Conditions

1.74 This representative view is the first of a suite of views (nos. 7, 8, 9 and 10) taken from within Osterley Park, which is a Registered Park and Garden and falls within an associated conservation area. The viewpoint is taken from the junction of a public right of way and the access road into Osterley Park and is located 1 km northwest of the site.

1.75 The fore and middle ground of the view takes in a pasture field that is not publicly accessible. Beyond the field in the background of the view the residential dwellings of Jersey Road and Ashley Drive can be seen. These two storey detached and semi-detached properties address and back onto the pasture field.

1.76 Rising above the Ashley Drive residential dwellings in the far distance to the east (left), the upper storeys of the GSK office and the top of the Sky Campus wind turbine can be glimpsed. In the winter, a limited glimpsed view can also be gained to the Former Gillette Factory clock tower through the mature trees lining Jersey Road. The view to the site is screened by this intervening visual barrier and built form.

1.77 The view has some scenic quality and is across a conservation area with limited potential for substitution of some elements within the view and it is therefore considered to have a medium value.



© AR LONDON

1.6 m above ground

15:26 05 April 2019

Existing

View 07 Osterley Park (entrance)

Assessment of Effects

1.78 The representative view would be experienced by walkers and visitors to Osterley Park and is considered to have a high susceptibility to change and a high to medium sensitivity to the proposed development.

Effects during Construction Phase

1.79 A limited view could be gained to the cranes associated with the construction of the proposed development from this representative view. It would have a local, direct, medium term, temporary, very low magnitude of impact. Through combining this magnitude of impact with the high to medium sensitivity the construction stage of the proposed development would have Minor and Adverse effect.

Effects during Completed Development Stage

1.80 The representative view demonstrates that the intervening boundary trees screen views towards the proposed development. In the summer, when the trees are in leaf, the proposed development would not be visible from this viewpoint. It is therefore considered that the proposed development would have a local, direct, permanent, very low magnitude of impact. Through combining this magnitude of impact with the high to medium sensitivity it would have Minor **Neutral** effect.



© AVR LONDON

1.6 m above ground

15:26 05 April 2019

Proposed

View 07 Osterley Park (entrance)

Cumulative Effects during Construction Phase

1.81 The construction of the proposed development may, subject to programming and phasing, be read in conjunction with the construction of cumulative scheme ref. 9 (Homebase, Syon Lane). The effect, in combination with this cumulative scheme, would remain unchanged.

Cumulative Effects during Completed Development Stage

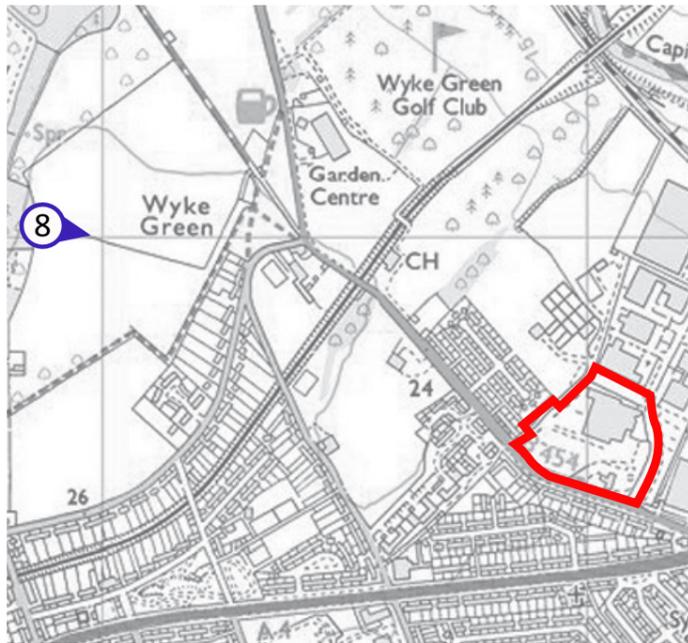
1.82 The proposed development would be visible within the context of glimpsed views of the upper storeys of cumulative scheme ref. 9 (Homebase, Syon Lane). The effect, in combination with this cumulative scheme, would remain unchanged.



Cumulative

View 08 Osterley Park (centre)

VIEWPOINT MAP



Baseline Conditions

1.83 Located approximately 1 km from the site, this representative view is taken from a non-designated footpath within Osterley Park, which is a Registered Park and Garden and falls within a conservation area.

1.84 The fore and middle ground of the view is dominated by a pasture field that is not publicly accessible. The boundary of Osterley Park is defined by a buffer of mature trees that screens most of the view towards the wider townscape. In the winter a glimpsed view can be gained to the residential dwellings on Jersey Road, which back onto the park, and to the former Gillette Factory clock tower. The site is not visible from this location.

1.85 The view has some scenic quality and is across a conservation area with limited potential for substitution of some elements within the view and it is therefore considered to have a medium value.



Existing

View 08 Osterley Park (centre)

Assessment of Effects

1.86 The representative view would be experienced by visitors to Osterley Park and is considered to have a high susceptibility to change and a high to medium sensitivity to the proposed development.

Effects during Construction Phase

1.87 A limited view would be gained to the cranes and scaffolding associated with the construction of the proposed development from this representative view. It would have a local, direct, medium term, temporary, low magnitude of impact. Through combining this magnitude of impact with the high to medium sensitivity the construction stage of the proposed development would have **Minor to Moderate** Adverse effect.

Effects during Completed Development Stage

1.88 The majority of the proposed development would be screened within this view by the buffer of mature trees on the southern boundary of Osterley Park. A limited view will be possible of Blocks A and G; the interlocking of solid and framed elements on Block B and the addition of bolt on balconies will assist in articulating the facade and breaking up the mass. It is therefore considered that the proposed development would have a local, direct, permanent, low magnitude of impact, in the long term. Through combining this magnitude of impact with the high to medium sensitivity it would have **Minor to Moderate Neutral** effect. It is considered that the effect would be neutral because whilst the proposed development would not enhance the view, it would not detract from the visual receptor's appreciation of the fore and middle ground **of the views and would therefore have neither a beneficial nor adverse effect** on the character of the view.

*A rendered view has been prepared to illustrate how the proposed development could be experienced in this representative view. The rendered view is provided in Technical Appendix 1.6 of this Volume and is based on the Design Code.*



Proposed

View 08 Osterley Park (centre)

Cumulative Effects during Construction Phase

1.89 The construction of the proposed development would, subject to programming and phasing, be read in conjunction with the construction of cumulative scheme ref. 9 (Homebase, Syon Lane). The effect, in combination with this cumulative scheme, would remain unchanged.

Cumulative Effects during Completed Development Stage

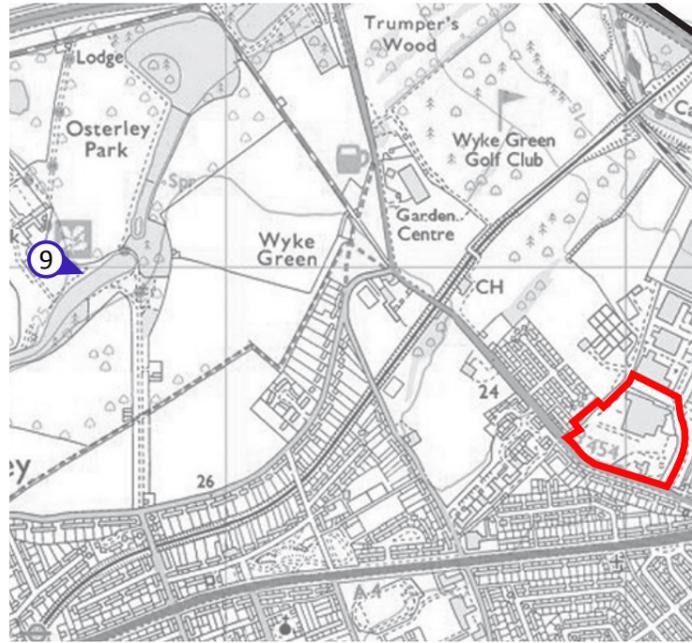
1.90 The proposed development and intervening trees and built form would block views of cumulative scheme ref. 9 (Homebase, Syon Lane) and the effect would remain unchanged.



Cumulative

View 09 Osterley Park (Osterley Park House)

VIEWPOINT MAP



Baseline Conditions

1.91 This representative view has been taken from the top of the steps leading to Osterley Park House, a Grade I listed building. It is located within Osterley Park a Registered Park and Garden and falls within a conservation area. The viewpoint lies approximately 1.35 km northwest of the site and it illustrates the parkland character of Osterley Park that falls around the house. This area is publicly accessible from 7am to 7.30pm.

1.92 The view is identified within the GWC: Appendix View Assessment (Ref. OP1 – Osterley House) as a key view from Osterley House which looks over the intact, open, designed landscape, providing an authentic experience of the heritage assets.

1.93 The stairs and wall, crowned with an eagle sculpture, are important features in the foreground. The view is relatively contained to the south (right) due to mature trees which frame the view, but is more open to the northeast (left) with the open parkland area to the front of the house providing a wider panorama towards the middle lake, visible in the background to the north east (left). A path leads from the foreground towards the lake.



© AR LONDON

1.6 m above ground

15:03 11 March 2019

Existing

View 09 Osterley Park (Osterley Park House)

1.94 In the middle and background of the view is the informal parkland which includes lakes and groups of evergreen and deciduous trees. This woodland group screens views to the car park and built form beyond.

1.95 The site is not visible due to the intervening vegetation. Vehicular noise can be heard from the M4, which runs close by and outside the view, to the northeast, existing tall buildings associated with Ealing Town Centre can be glimpsed in the far background.

1.96 The representative view is taken from a Grade II\* registered garden and is located in front of a Grade I listed building and therefore has a high value.

Assessment of Effects

1.97 Visual receptors experiencing this view would be the public visiting the Osterley Park or the House and the representative view would have a high susceptibility to change and a high sensitivity to the proposed development.

Effects during Construction Phase

1.98 The mature trees present in the middle ground prevent a view to the cranes and construction site of the proposed development, resulting in no impact and **No Effect**.

Effects during Completed Development Stage

1.99 The view to the proposed development would be prevented due to the mature trees which frame it, resulting in no impact and **No Effect**.



Proposed

View 09 Osterley Park (Osterley Park House)

Cumulative Effects during Construction Phase

1.100 Mature trees block any views of the cumulative schemes and the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

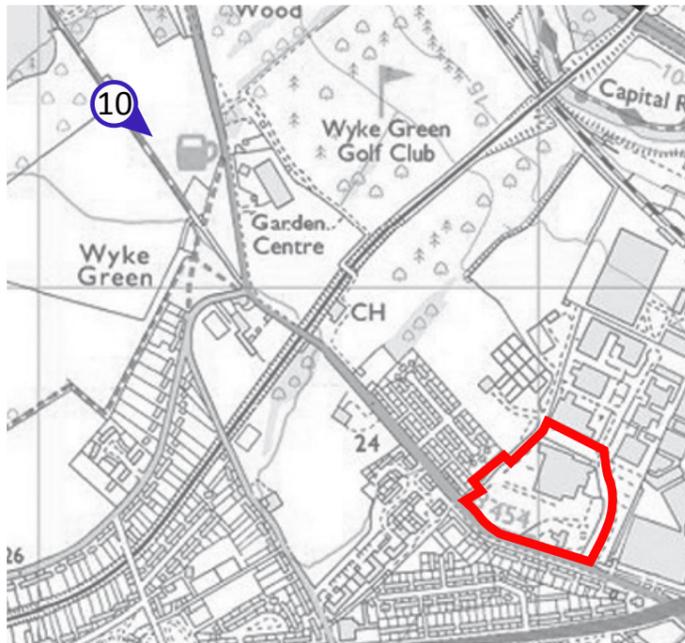
1.101 Mature trees block any views of the cumulative schemes and the operational effect would remain the same.



Cumulative

View 10 Osterley Park (Bridleway)

VIEWPOINT MAP



Baseline Conditions

1.102 This representative view looks south along Osterley Lane, a bridleway within Osterley Park, approximately 1 km north east of the site. The viewpoint falls within the associated Registered Park and Garden and conservation area.

1.103 The bridleway is framed by managed native hedges, which channel the view towards the Entrance Lodges to Osterley Park in the background of the view. These two white rendered buildings are Grade II listed along with the associated gate piers to the park. The gate prevents vehicle access to the northern extent of the track.

1.104 Beyond the Entrance Lodges is Wyke Green, which contains a number of mature trees that limit the view to the surrounding townscape. A glimpsed view can, however, be gained to the Former Gillette Factory clock tower in the winter.

1.105 The view has some scenic quality and is across a conservation area with limited potential for substitution of some elements within the view and it is therefore considered to have a medium value.



Existing

View 10 Osterley Park (Bridleway)

Assessment of Effects

1.106 The representative view would be experienced by walkers, horse riders and visitors to Osterley Park and is considered to have a high susceptibility to change and a medium sensitivity to the proposed development.

Effects during Construction Phase

1.107 A limited view would be possible of the cranes and scaffolding associated with the construction of the proposed development from this representative view. It would have a local, direct, medium term, temporary, low magnitude of impact. Through combining this magnitude of impact with the high to medium sensitivity the construction stage of the proposed development would have **Minor to Moderate** Adverse effect.

Effects during Completed Development Stage

1.108 The majority of the proposed development would be screened within this view by intervening tree cover and built form. A limited view would be possible of Blocks A, H and G. It is considered that the proposed development would have a local, direct, permanent, low magnitude of impact, in the long term. Through combining this magnitude of impact with the high to medium sensitivity it would have a **Minor to Moderate Neutral** effect. It is considered that the effect would be neutral because **the proposed development would have neither a beneficial nor adverse effect on the character of the view.**



Proposed

View 10 Osterley Park (Bridleway)

Cumulative Effects during Construction Phase

1.109 The construction of the proposed development may, subject to programming and phasing, be read in conjunction with the construction of cumulative scheme ref. 9 (Homebase, Syon Lane). The effect, in combination with this cumulative scheme, would remain unchanged.

Cumulative Effects during Completed Development Stage

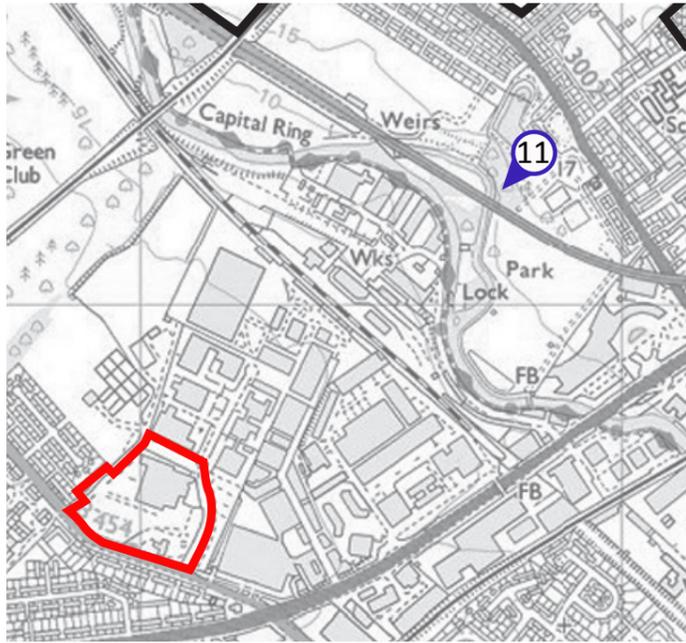
1.110 None of the cumulative schemes would be visible from this viewpoint and the effect during the operational phase would therefore remain unchanged.



Cumulative

View 11 Boston Manor

VIEWPOINT MAP



Baseline Conditions

1.111 This representative view is taken from the gardens of Boston Manor House, which are publicly accessible from 8am to dusk. The gardens are located within the Grand Union Canal & Boston Manor Conservation Area, and the viewpoint is approximately 960 m to the northeast of the site.

1.112 Boston Manor House itself is situated behind the viewpoint and is identified within LBH's GWC: Appendix View Assessment as a heritage asset sensitive to potential tall buildings proposals and this view is tested within the View Assessment (Ref. BM1 – Rear of the Boston Manor House).

1.113 The foreground of the view is relatively open, occupied by the formal lawns associated with the manor house with the occasional tree present in the middle ground which is predominantly evergreen specimen conifers. In the background the evergreen trees become denser and screen the majority of the view to the elevated carriageway of the M4, although vehicular noise can be heard from the M4 as it travels past Boston Manor. The site is not visible due to the intervening vegetation.



Existing

View 11 Boston Manor

1.114 Outside the field of vision of the view, to the south, existing tall buildings associated with the GSK head office are visible, providing an urban character to the park itself.

1.115 The representative view is located within a conservation area and has a high scenic value. It is therefore considered to have a medium value.

Assessment of Effects

1.116 Visual receptors experiencing this view would be visitors of the park and the representative view would have a high susceptibility to change and a high to medium sensitivity to the proposed development.

Effects during Construction Phase

1.117 The mature trees present in the middle ground prevent a view to the cranes and construction site of the proposed development, resulting in no magnitude of impact and No **Effect**.

Effects during Completed Development Stage

1.118 The view to the proposed development would be prevented due to the mature trees which frame it, resulting in no magnitude of impact and No **Effect**.



Proposed

View 11 Boston Manor

Cumulative Effects during Construction Phase

1.119 There may be glimpses of the cranes associated with the construction of cumulative scheme ref. 9 (Homebase, Syon Lane), however the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

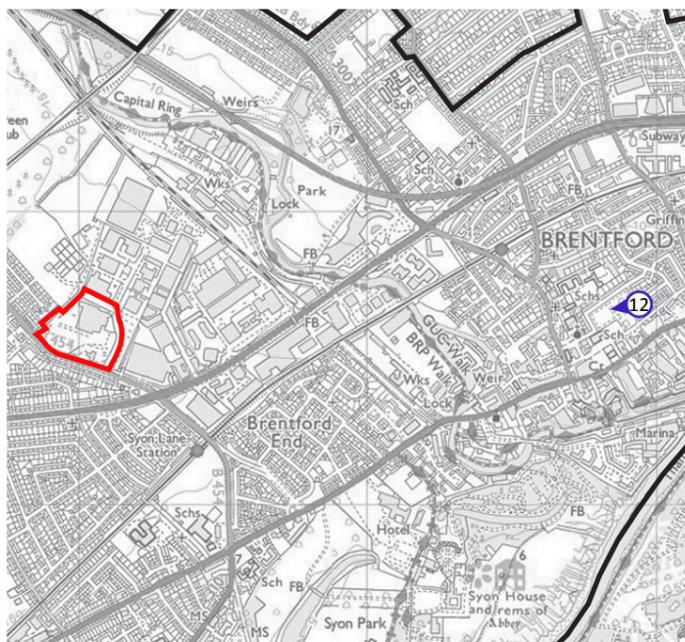
1.120 Mature trees prevent the view to the cumulative schemes and the operational effect would remain the same.



Cumulative

View 12 St Paul's Recreation Ground

VIEWPOINT MAP



Baseline Conditions

1.121 This representative view is located within the eastern extent of St Paul's Recreation Ground falls within the St Pauls Brentford Conservation Area, 1.7 km from the site.

1.122 The foreground of the view is dominated by the open area of amenity space, framed by mature trees. The formal layout of the recreation ground is integral to the planned Victorian character of the area and the space is contained by two storey 19th century residential terraces. This is typical of the roads in the St Paul's Conservation which are well preserved and of good architectural quality, giving the area variety, clarity and interest.

1.123 The site is not visible from this location due to intervening visual barriers. A glimpsed view can be gained to Great West House to the north (right) of the view, marking the Great West Road and M4 junction. These roads are audible from within this recreation ground.

1.124 The representative view is located within a conservation area and has limited detracting elements; it is therefore considered to have a medium value.



Existing

View 12 St Paul's Recreation Ground

Assessment of Effects

1.125 The representative view would have a high susceptibility to change and a high to medium sensitivity to the proposed development.

Effects during Construction Phase

1.126 There would be no views of the construction activity associated with the proposed development due to the built form that frames the recreation ground, resulting in no magnitude of impact and No **Effect**.

Effects during Completed Development Stage

1.127 The view to the proposed development would be prevented due to the built form that frames the recreation ground, resulting in no magnitude of impact and No **Effect**.



Proposed

View 12 St Paul's Recreation Ground

Cumulative Effects during Construction Phase

1.128 There may be glimpses of the cranes associated with the construction of cumulative scheme ref. 9 (Homebase, Syon Lane), however the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

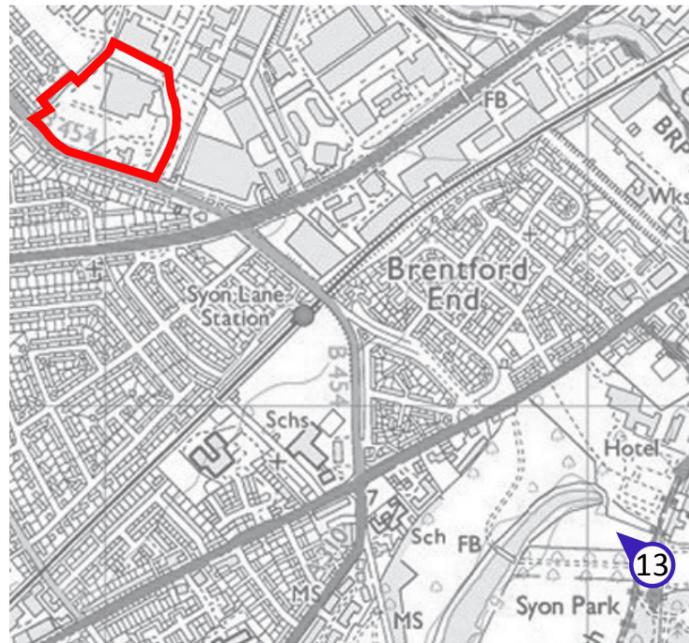
1.129 Built form prevent the view to the cumulative schemes and the operational effect would remain the same.



Cumulative

View 13 Syon Park (Gate Lodge)

VIEWPOINT MAP



Baseline Conditions

1.130 This representative view is the first of a suite of three views (nos. 13, 14 and 15) taken from within Syon Park, a Grade I registered park to the south of the site. It is positioned 1.25 km to the southwest of the site and falls within the Isleworth Riverside Conservation Area and the buffer zone surrounding the Royal Botanic Gardens World Heritage site.

1.131 The view is located beside the Gate Lodges, which are Grade I listed, and shows the landscaped setting of the heritage asset. Syon Park is identified within LBH's GWC: Appendix View Assessment as a heritage asset sensitive to potential tall buildings proposals and this view, amongst others, is tested within the View Assessment (Ref. SP03 – Syon House).

1.132 The view is located in front of Syon House, beside the Gate Lodges and looks northwest. The view is generally open with the wide area of grass in the fore ground, the Park Road and the wider estate beyond. The northern tree line that frames the Great Lime Avenue leading to the trout Fishery Pond is an important feature of the middle ground to the west (left). Dense vegetation associated with the fishery pond and park boundary terminate the view. The site is not visible due to existing vegetation.



Existing

View 13 Syon Park (Gate Lodge)

1.133 Albeit that the view looks over part of the original Capability Brown landscape, it is slightly compromised by the visibility of existing tall buildings in the London Gateway, including GSK and the Great West House in the winter.

1.134 The representative view has a medium to high value as it is taken from a Grade I registered Park which is also part of a conservation area and the view to the west is a designed vista which takes in the Lime Avenue.

Assessment of Effects

1.135 Visual receptors experiencing this view would be people passing through the park and visiting Syon House on foot or by vehicle on Park Road; the representative view would have a high susceptibility to change and a high to medium sensitivity to the proposed development.

Effects during Construction Phase

1.136 There may be glimpses of the cranes associated with the construction of the proposed development in the background of the view; this would have a local, direct, medium term, temporary, very low magnitude of impact. Through combining this magnitude of impact with the high to medium sensitivity the construction stage of the proposed development would have a Minor Adverse effect.

Effects during Completed Development Stage

1.137 The proposed development will be screened by intervening tree cover in views from this location and the proposed development will have a local, direct, permanent, very low magnitude of impact in the winter. It is considered that the proposed development will not be visible in the summer when the trees are in leaf. Therefore, through combining this magnitude of impact with the high to medium sensitivity, the proposed development has a Minor **Neutral** effect. It is considered that the effect would be neutral because the proposed development would have an indiscernible effect on the character of the view and the change would be imperceptible due to distance and screening by vegetation.

*A rendered view has been prepared to illustrate how the proposed development could be experienced in this representative view. The rendered view is provided in Technical Appendix 1.6 of this Volume and is based on the Design Code.*



Proposed

View 13 Syon Park (Gate Lodge)

Cumulative Effects during Construction Phase

1.138 The construction of the proposed development would, subject to programming and phasing, be read in conjunction with the construction of cumulative scheme ref. 9 (Homebase, Syon Lane), increasing the magnitude of impact to low and the effect to **Moderate to Minor Adverse**.

Cumulative Effects during Completed Development Stage

1.139 On completion, upper storeys of cumulative scheme ref. 9 (Homebase, Syon Lane) would be visible in the view. The operational effect would remain the same.



Cumulative

View 13 Syon Park (Gate Lodge)



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Existing

1.6 m above ground 12:44 11 March 2019



© AWR LONDON  
Proposed

1.6 m above ground 12:44 11 March 2019

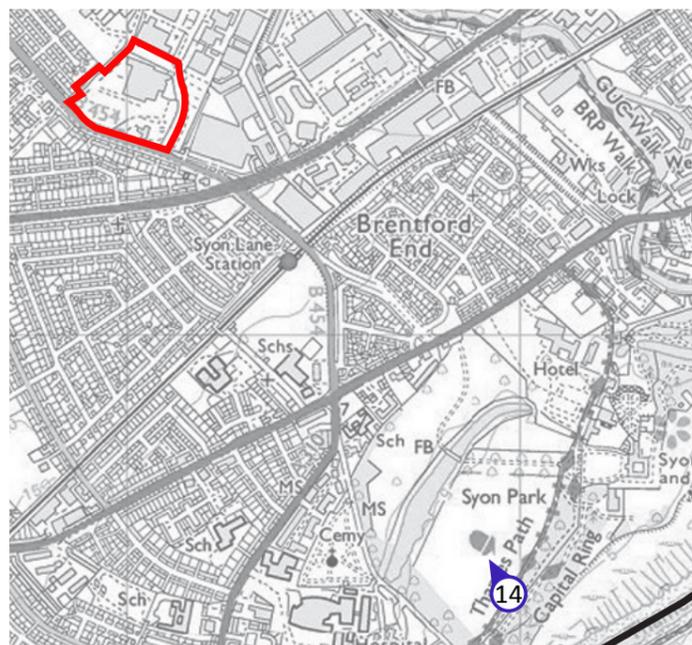


© AWR LONDON  
Cumulative

1.6 m above ground 12:44 11 March 2019

View 14 Syon Park southern entrance footpath (north)

VIEWPOINT MAP



Baseline Conditions

1.140 This kinetic representative view from a footpath is positioned within Syon Park, approximately 1.35 km to the southeast of the site, and it illustrates the views experienced by pedestrian of the open, parkland, character of Syon Park.

1.141 The view illustrates the open character of this part of the park, with the fore and middle ground occupied by a large extent of grass. Crossing the middle ground of the view is an estate metal fence, associated with Park Road; some isolated trees beyond indicate the position of the trout fishery pond which is a remnant of the 18th century Capability Brown redevelopment.



Existing

View 14 Syon Park southern entrance footpath (north)

1.142 This representative view provides a wide vista over the landscape which is designed to look natural and give the viewer an impression of being in the countryside. The view provides a sense of the naturalistic landscape as designed and intended by Capability Brown. A dense line of vegetation on the boundary of Syon Park terminates the view, with glimpsed wintertime views of the buildings beyond on London Road and Busch Close, as well as the clock tower of the Former Gillette Factory (Grade II) which can be seen rising above the trees to the northwest (centre). In the winter, to the north, a glimpsed view can be gained to **the GSK Office beyond the park's boundary. Existing vegetation screens** the view toward the site.

1.143 Outside of the view, to the northeast, existing tall buildings associated with Brentford (including GSK Office, Great West House and Key Eye Tower) can be glimpsed in the far background and provides an urban character.

1.144 This representative view is also identified within the GWC: Appendix View Assessment (Ref. SP2 – Park Road 2). It is considered to have a medium to high value as it is taken from a Grade I registered Park which is also part of the Isleworth Riverside Conservation Area and the buffer zone surrounding the Royal Botanic Gardens World Heritage site. It has a scenic value and has limited potential for substitution for elements within the fore and middle ground of the view.

Assessment of Effects

1.145 Visual receptors experiencing this view would be people passing through the park and visiting Syon House on foot or by vehicle on Park Road; the representative view would have a high susceptibility to change and a high to medium sensitivity to the proposed development.

Effects during Construction Phase

1.146 In the short term the construction of the proposed development would have a local, direct, medium term, temporary, low magnitude of impact. Through combining this magnitude of impact with the high to medium sensitivity, the construction stage of the proposed development would have a **Minor to Moderate Adverse** effect.

Effects during Completed Development Stage

1.147 A glimpsed view would be gained of the upper storeys of Blocks A and B in this view. The Gillette clock tower would still break the skyline.



Proposed

View 14 Syon Park southern entrance footpath (north)

1.148 The visibility of the proposed development within the view would be reduced in the summer when the trees present within Syon Park are in leaf.

1.149 Overall the proposed development would have a local, direct, permanent, low magnitude of impact. Therefore, through combining this magnitude of impact with the high to medium sensitivity, the proposed development has a **Minor to Moderate Neutral** effect.

*A rendered view has been prepared to illustrate how the proposed development could be experienced in this representative view. The rendered view is provided in Technical Appendix 1.6 of this Volume and is based on the Design Code.*

Cumulative Effects during Construction Phase

1.150 The construction of the proposed development would, subject to programming and phasing, be read in conjunction with the construction of cumulative scheme ref. 9 (Homebase, Syon Lane). Views towards other cumulative schemes would be obscured by the intervening tree cover. The construction effect would remain the same.

Cumulative Effects during Completed Development Stage

1.151 On completion, upper storeys of cumulative scheme ref. 9 (Homebase, Syon Lane) would be visible in the view. Views towards other cumulative schemes would be obscured by the intervening tree cover. The operational effect would remain the same.



Cumulative

View 14 Syon Park southern entrance footpath (north)

Existing



Proposed

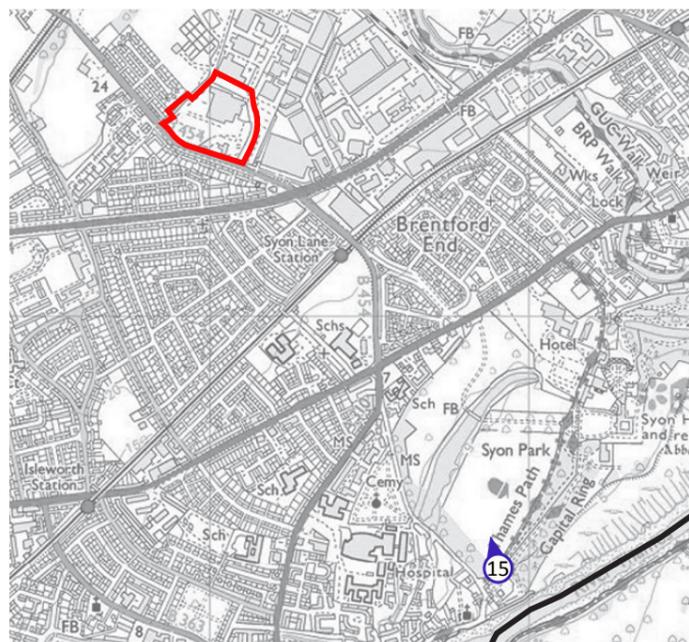


Cumulative



View 15 Syon Park southern entrance footpath (south)

VIEWPOINT MAP



Baseline Conditions

1.152 This kinetic representative view is positioned approximately 1.45 km to the southeast of the site, also from the southern entrance footpath but closer to the entrance than View 14. It also illustrates the fleeting view experienced by vehicles of the open, parkland, character of Syon Park.

1.153 The foreground of the view is occupied by Park Road and associated metal estate fencing, with informal parkland beyond. The line of mature trees denoting the linear lake, which is a remnant of the 18th century Capability Brown redevelopment, are visible beyond.

1.154 Predominately deciduous trees line the park's boundary and there are glimpsed winter-time views to the built form beyond. The site is not visible from this viewpoint.

1.155 Outside of the view, to the northeast, existing tall buildings associated with Brentford (including the Key Eye Tower) can be glimpsed in the far background above Syon House's Gate Lodges aiding with legibility and providing an urban character.



Existing

View 15 Syon Park southern entrance footpath (south)

1.156 This view is also identified within the GWC: Appendix View Assessment (Ref. SP1 – Park Road 1). It considered to have a medium to high value as it is taken from a Grade I registered Park which is also part of the Isleworth Riverside Conservation Area and the buffer zone surrounding the Royal Botanic Gardens World Heritage site. It has a scenic value and has limited potential for substitution for elements within the fore and middle ground of the view.

Assessment of Effects

1.157 Visual receptors experiencing this view would be people passing through the park and visiting Syon House on foot or by vehicle on Park Road; the representative view would have a high susceptibility to change and a high to medium sensitivity to the proposed development.

Effects during Construction Phase

1.158 In the short term the construction of the proposed development would have a local, direct, medium term, temporary, very low magnitude of impact. Through combining this magnitude of impact with the high sensitivity, the construction stage of the proposed development would have a Minor Adverse effect.

Effects during Completed Development Stage

1.159 There would be glimpses of the uppermost storeys of Block H in this view; the visibility of the proposed development within the view would be reduced in the summer when the trees present within Syon Park are in leaf.

1.160 Overall the proposed development would have a local, direct, permanent, very low magnitude of impact. Therefore, through combining this magnitude of impact with the high sensitivity, the proposed development has a Minor **Neutral** effect.

*A rendered view has been prepared to illustrate how the proposed development could be experienced in this representative view. The rendered view is provided in Technical Appendix 1.6 of this Volume and is based on the Design Code.*



Proposed

View 15 Syon Park southern entrance footpath (south)

Cumulative Effects during Construction Phase

1.161 The construction of the proposed development would, subject to programming and phasing, be read in conjunction with the construction of cumulative scheme ref. 9 (Homebase, Syon Lane). The magnitude of impact would increase to low and the scale of effect to **Moderate Adverse**.

Cumulative Effects during Completed Development Stage

1.162 On completion, upper storeys of cumulative scheme ref. 9 (Homebase, Syon Lane) would be visible in the view. Views towards other cumulative schemes would be obscured by the intervening tree cover. The magnitude of impact would increase to low and the scale of effect to **Moderate Neutral**.



Cumulative

View 15 Syon Park southern entrance footpath (south)

Existing



Proposed

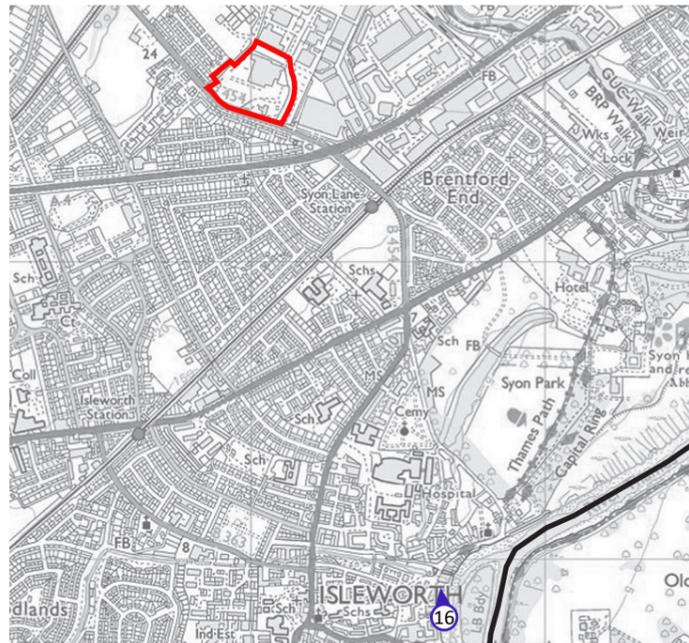


Cumulative



View 16 Riverside Walk Isleworth

VIEWPOINT MAP



Baseline Conditions

1.163 Located within the Isleworth Riverside Conservation Area, 1.8 km south of the site, this representative view looks north along the Isleworth Promenade. The Thames Landscape Strategy recognises the visual link between states:

*"Isleworth retains a distinct historic waterfront, enclosed down a side-channel of working boatyards located on converted barges moored off the island's tree lined riverbank."* (para 4.10.24)

1.164 The recently completed residential development of Lion Wharf can be seen to the left (northwest) of the view, with the Town Wharf Public House beyond. The River Thames, which is tidal in this location, curves slightly to the northeast (right), and the wooded Isleworth Ait can be seen on the opposite side of this waterway.

1.165 The townscape present within the middle ground of the view includes late 20th century and early 21st century redevelopment of historic wharfs, which includes residential and office uses. In the background are the early 18th century properties that line Church Street. Rising above these properties a glimpsed view can be gained to GSK Office.



Existing

View 16 Riverside Walk Isleworth

1.166 It is considered that this representative view has a medium value since it is of moderate local importance and is situated within a conservation area and the buffer zone surrounding the Royal Botanic Gardens World Heritage site.

Assessment of Effects

1.167 The representative view would have a high susceptibility to change as it is taken from the Thames Path and a high to medium sensitivity to the proposed development.

Effects during Construction Phase

1.168 The built form of Town Wharf Public House present in the middle ground is considered to prevent a view to the cranes and construction site of the proposed development, resulting in no magnitude of impact and No **Effect**.

Effects during Completed Development Stage

1.169 The view to the proposed development would be prevented due to the existing built form of Isleworth, resulting in no magnitude of impact and No **Effect**.



Proposed

View 16 Riverside Walk Isleworth

Cumulative Effects during Construction Phase

1.170 Built form prevents the view to the cumulative schemes and the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

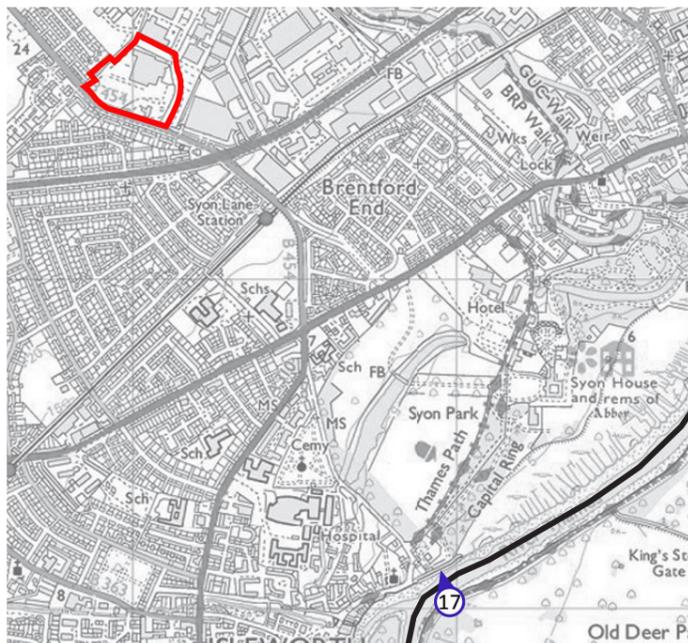
1.171 Built form prevent the view to the cumulative schemes and the operational effect would remain the same.



Cumulative

View 17 Riverside walk Kew

VIEWPOINT MAP



Baseline Conditions

1.172 The Thames Path that travels along the eastern side of the river between Richmond and Kew is described within the Thames Landscape Strategy as having a “remote, rural character.” (para 4.10.9). The path is framed within riverside trees and the occasional gap provides framed views of the surrounding townscape, helping with orientation. This viewpoint is taken through such a gap at a bend in the river approximately 1.7 km away from the site. It takes in the River Thames and the Grade I listed Syon Park Boat House on the opposite bank.

1.173 The view is located within the Old Deer Park Conservation Area, which is south and east of the river, looking towards Syon Park and the Isleworth Riverside Conservation Area, which is north of the river. The view also falls within the Royal Botanic Gardens World Heritage site Buffer Zone, and is identified by LBRuT’s on their Proposal Map as a view which should be protected under Policy DM HD7. The view is also identified in the LBH Urban Context and Character Study.



Existing

View 17 Riverside walk Kew

1.174 The River Thames can be seen in the foreground and a glimpsed view can be gained in the winter to Ferry House and Green School House. Beyond these properties is Syon Park, which is not visible from this viewpoint. To the west (left) outside the photo is the Grade II\* listed Church of All Saints on the opposite side of the river. The tower of which is recognises as a local landmark.

1.175 This representative view has a high value since it is protected in planning policy (LBRuT Policy DM HD7) and is taken from within Old Deer Park Conservation Area, looking towards Isleworth Riverside Conservation Area. It is also of high scenic value.

Assessment of Effects

1.176 The representative view would have a high susceptibility to change and a high sensitivity to the proposed development.

Effects during Construction Phase

1.177 The built form of Green School House in the middle ground is considered to prevent a view to the cranes and construction site of the proposed development, resulting in no magnitude of impact and **No Effect**.

Effects during Completed Development Stage

1.178 The view to the proposed development would be prevented due to the existing built form of Green School House, resulting in no magnitude of impact and **No Effect**.



Proposed

View 17 Riverside walk Kew

Cumulative Effects during Construction Phase

1.179 Built form prevents the view to the cumulative schemes and the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

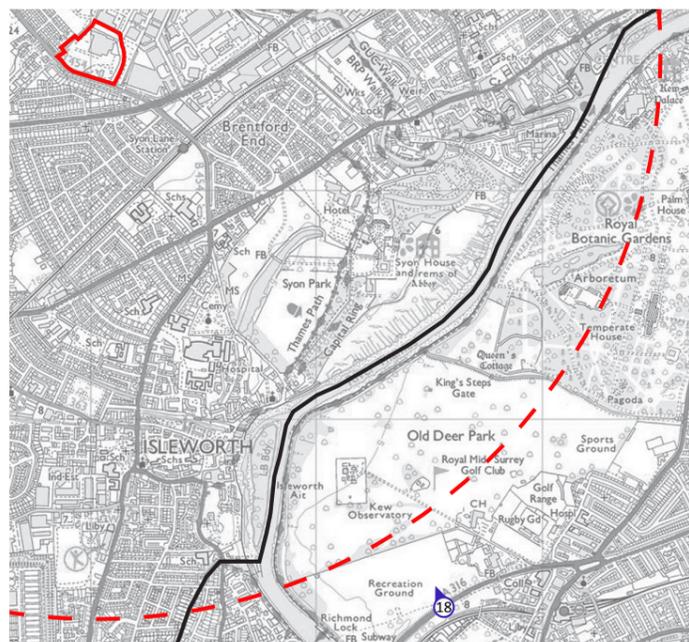
1.180 Built form prevent the view to the cumulative schemes and the operational effect would remain the same.



Cumulative

View 18 Northern footpath along A316

VIEWPOINT MAP



Baseline Conditions

1.181 This viewpoint is situated on the northern footpath of the A316, approximately 2.65 km south of the site, within the LBRuT.

1.182 It is situated within Old Deer Park Conservation Area and is identified within LBRuT's Proposal Map as a Vista towards a Landmark (Kew Observatory). LBRuT Policy DM HD7 seeks to protect the quality of the views indicated on the Proposals Map. The Thames Landscape Strategy identifies views across the Old Deer Park as a vista.

1.183 The fore and middle ground of the view takes in the Old Deer Park, which is laid out with both football and rugby pitches. There are some vehicles associated with a seasonal fun fair visible parked to the northeast (right) of the view.

1.184 A dense boundary of mature trees along the northern extent of the Old Deer Park screens views of the Royal Mid-Surrey Golf Course, the River and the site to the north. A limited glimpsed view can be gained to the Kew Observatory behind this boundary vegetation in the winter.



Existing

View 18 Northern footpath along A316

1.185 It is considered that this view has a medium value due to its generally scenic value, its location within Old Deer Park Conservation Area and its LBRuT planning policy designation. Although not visible in the view, the viewer's experience is, however, influenced by the location adjacent to the busy A316 and associated vehicle noise etc.

Assessment of Effects

1.186 The representative view would have a medium susceptibility to change as it would be experienced by people travelling to work, where the view to the Old Deer Park is part of the kinetic experience. It would have an overall medium sensitivity to the proposed development.

Effects during Construction Phase

1.187 Very limited, intermittent views could be possible of the cranes associated with the construction of the proposed development from this representative view. It would have a local, direct, medium term, temporary, very low magnitude of impact. Through combining this magnitude of impact with the medium sensitivity the construction stage of the proposed development would have No **Effect**.

Effects during Completed Development Stage

1.188 The view to the proposed development would be prevented due to the dense northern boundary of mature trees that frame the Old Deer Park, resulting in no magnitude of impact and No **Effect**



Proposed

View 18 Northern footpath along A316

Cumulative Effects during Construction Phase

1.189 Mature trees block any views of the cumulative schemes and the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

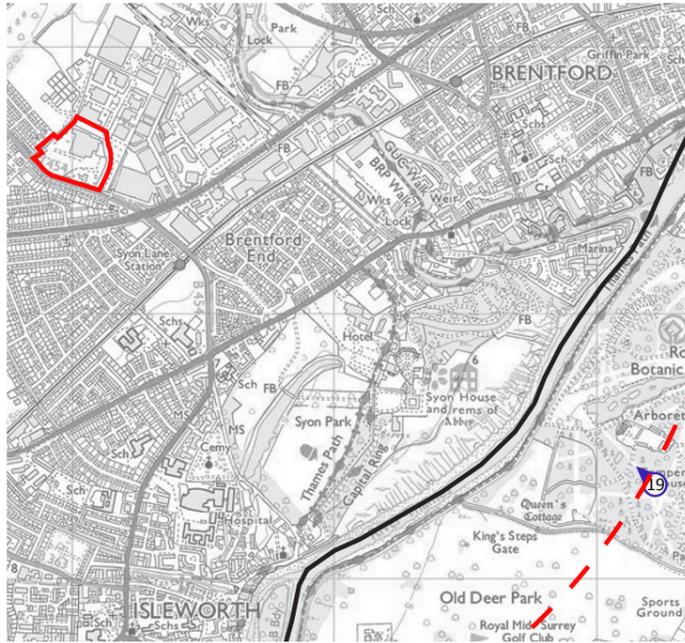
1.190 Intervening tree cover and built form prevent views to the cumulative schemes and the operational effect would remain the same.



Cumulative

View 19 Kew Gardens, Cedar Vista east

VIEWPOINT MAP



Baseline Conditions

1.191 This representative view is the first of a set of five representative views located within the Royal Botanic Gardens, Kew which is a planned landscape of international importance, reflected in its status as a World Heritage site, a Registered Park and Garden and a conservation area containing listed buildings (Grade I and Grade II) and Scheduled Monuments.

1.192 It is orientated northwest along the Cedar Vista, which is a designed vista, and is located approximately 2 km southeast of the site. The Royal Botanic Gardens are identified as a heritage asset which is sensitive to tall buildings proposals in the area in the GWC: Appendix View Assessment and this view is one of the views tested (Ref. BG11 – Pagoda Syon Vista).

1.193 Taken at the midpoint of the Cedar Vista, which connects the Great Pagoda to Syon Park, the view is a kinetic view. It is terminated to the southeast by the Great Pagoda and northwest by Syon Park. The evergreen, wooded character of the view originates from the Plantation Era of the gardens. The trees are predominantly specimen conifers, and they are positioned to provide a linear view towards Syon Park to the northwest.



Existing

View 19 Kew Gardens, Cedar Vista east

1.194 The representative view takes in designed vista and considered to be of exceptional value due to its international importance and scenic quality.

Assessment of Effects

1.195 The representative view would have a high susceptibility to change as it is experienced by people visiting the Royal Botanic Gardens whose attention is likely to be focused on the landscape. Through combining the value and susceptibility to change is considered that the view has a high sensitivity to the proposed development.

Effects during Construction Phase

1.196 The trees associated with the Cedar Vista would prevent views of the cranes associated with the construction of the proposed development, resulting in no magnitude of impact and No **Effect**.

Effects during Completed Development Stage

1.197 The view to the proposed development would be prevented due to the trees associated with the Cedar Vista, resulting in no magnitude of impact and No **Effect**.



Proposed

View 19 Kew Gardens, Cedar Vista east

Cumulative Effects during Construction Phase

1.198 Intervening visual barriers, principally trees within Kew Gardens, prevent views of the cumulative schemes and the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

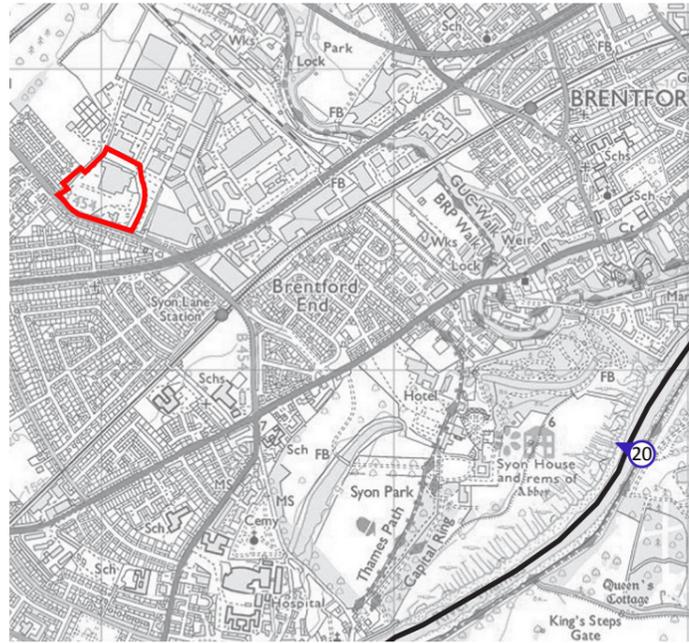
1.199 Intervening visual barriers, principally trees within Kew Gardens, prevent views of the cumulative schemes and the operational effect would remain the same.



Cumulative

View 20 Kew Gardens, Syon Vista/Cedar Vista west

VIEWPOINT MAP



Baseline Conditions

1.200 Positioned 1.9 km to the southeast of the site, this representative view has been taken from the Syon Vista Terrace at the eastern edge of the Royal Botanic Gardens, at the meeting point of the Botanical Gardens Syon Vista and Cedar Vista. The Botanic Gardens are a Grade I Registered Park and Garden and World Heritage site, and are located within the Royal Botanic Gardens Conservation Area.

1.201 This view looks west towards the River Thames and links the Royal Botanical Gardens to Syon House. The Royal Botanic Gardens World Heritage site Management Plan establishes the Syon Vista Terrace as:

*“the last substantial remnant of the open relationship that Richmond Gardens once had with the Thames, through both the famous Terrace in Queen Caroline’s garden and through Capability Brown’s later visual unification of Richmond Gardens, Syon Park and the Thames in between into one seamless design. It is a key space in terms of maintaining and understanding the visual connections between RBG Kew, Syon Park and the Thames”*



Existing

View 20 Kew Gardens, Syon Vista/Cedar Vista west

1.202 The viewpoint is identified within the GWC: Appendix View Assessment (BG10 – Syon Vista) and in the Royal Botanical Gardens World Heritage site Management Plan as a present day view.

1.203 A ha-ha designed by Capability Brown can be seen in the foreground which allows uninterrupted views to and across the river and is a key part of the Arcadian Thames landscape; one of the few locations where the Arcadian landscape is visible on both sides of the river simultaneously. The River Thames can be seen in the middle ground and the photo was taken at high tide.

1.204 On the opposite bank, a gap in the riparian vegetation facilitates an unobstructed view of the southern façade of Syon House, a Grade I listed building and the Grade I Registered Park and Garden of Syon Park. The riparian vegetation prevents a view to the site.

1.205 The representative view takes in a highly exceptional design view and falls within the Royal Botanic Gardens, which is a World Heritage site, Registered Park and Garden and part of a conservation area. It is therefore considered to have an exceptional value.

Assessment of Effects

1.206 Visual receptors experiencing this view would be public visiting the Botanic Gardens and the representative view would have a high susceptibility to change and a high sensitivity to the proposed development.

Effects during Construction Phase

1.207 The riparian vegetation present in the far middle ground of the view would prevent a view to the construction cranes of the proposed development, resulting in no magnitude of impact and No **Effect**.

Effects during Completed Development Stage

1.208 The view to the proposed development would be prevented due to the riparian vegetation present along the River Thames, resulting in no magnitude of impact and No **Effect**



Proposed

View 20 Kew Gardens, Syon Vista/Cedar Vista west

Cumulative Effects during Construction Phase

1.209 Intervening visual barriers, principally trees within Kew Gardens, prevent views of the cumulative schemes and the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

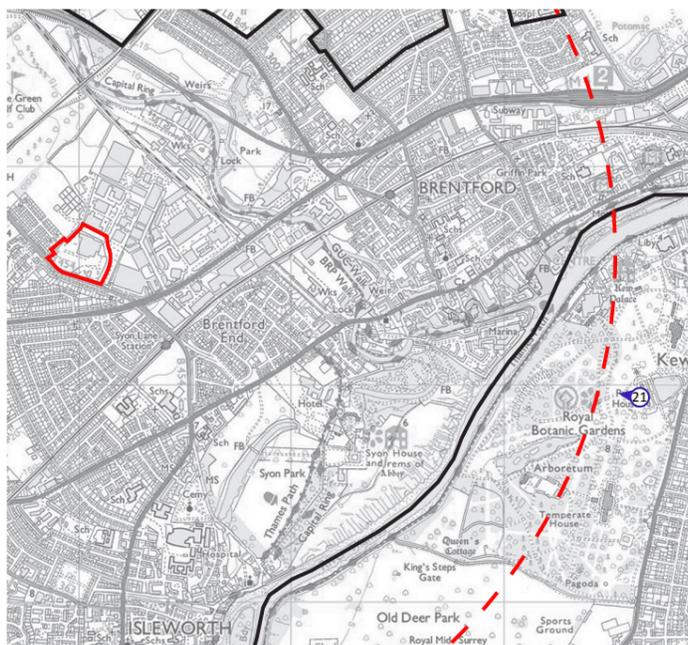
1.210 Intervening visual barriers, principally trees within Kew Gardens, prevent views of the cumulative schemes and the operational effect would remain the same.



Cumulative

View 21 Kew Gardens (west of the Palm House)

VIEWPOINT MAP



Baseline Conditions

1.211 This representative long distance view from within the Royal Botanic Gardens is identified within the GWC: Appendix View Assessment (BG7 – Rear of the Palm House) and is approximately 2.6 km south of the site. The Grade I listed Palm House is situated behind the view.

1.212 The Syon Vista visible to the southwest (left) of the view and also identified in the Royal Botanical Gardens World Heritage site Management Plan. It provides a planned vista between the Palm House and Syon Park, which is experienced as part of a kinetic view.

1.213 The view looks towards the west and takes in the steps of the Palm House in the foreground of the view, along with the formal lawns and planting beds in the middle ground.

1.214 The representative view takes in a highly exceptional design view and falls within the Royal Botanic Gardens, which is a World Heritage site, Registered Park and Garden and part of a conservation area. It is therefore considered to have an \_ value.



Existing

View 21 Kew Gardens (west of the Palm House)

Assessment of Effects

1.215 Visual receptors experiencing this view would be public visiting the Botanic Gardens and the representative view would have a high susceptibility to change and a high sensitivity to the proposed development.

Effects during Construction Phase

1.216 The trees and vegetation present in the far middle ground of the view would prevent a view to the construction cranes of the proposed development, resulting in no magnitude of impact and No **Effect**.

Effects during Completed Development Stage

1.217 The view to the proposed development would be prevented due to the trees and vegetation associated with the Royal Botanic Gardens, resulting in no magnitude of impact and No **Effect**.



Proposed

View 21 Kew Gardens (west of the Palm House)

Cumulative Effects during Construction Phase

1.218 Intervening visual barriers, principally trees within Kew Gardens, prevent views of the cumulative schemes and the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

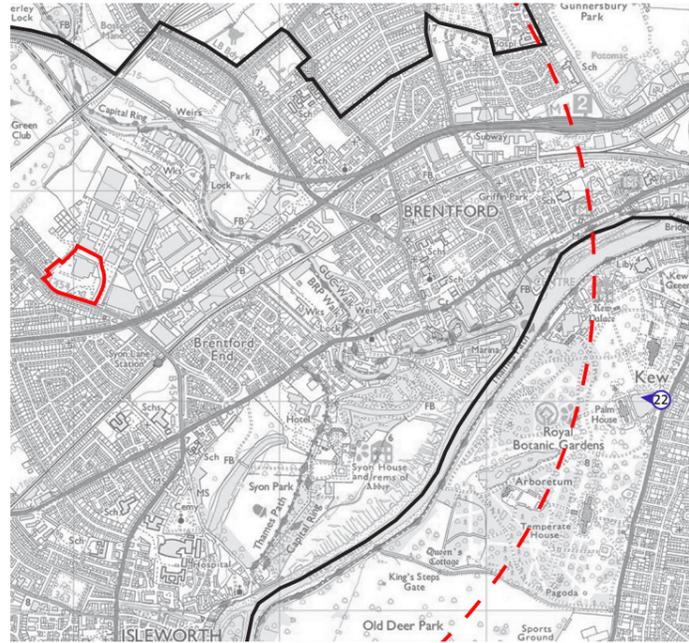
1.219 Intervening visual barriers, principally trees within Kew Gardens, prevent views of the cumulative schemes and the operational effect would remain the same.



Cumulative

View 22 Kew Gardens ('The Botanical' building)

VIEWPOINT MAP



Baseline Conditions

1.220 This representative view, located 2.8 km south of the site, is located within the Royal Botanic Gardens looking towards the site, which cannot be seen.

1.221 Identified within the GWC: Appendix View Assessment (BG9 – Opposite Palm House), this view is also identified in the Royal Botanical Gardens World Heritage site Management Plan and is a historically planned view from the Grade II listed Museum Number 1 towards the Grade I listed Palm House, over the lake. This view represents how the Palm House and lake were intended to be viewed from outside the front of Museum Number 1. The view is dominated by the lake, which provides a setting to the Palm House and is framed by trees. It is considered to be an unspoilt view with no visual detractors.

1.222 The representative view affords an uninterrupted vista across the lake towards the Grade I listed Palm House. It is located within a World Heritage site, Registered Park and Garden and part of a conservation area. It is considered to have an exceptional value.



Existing

View 22 Kew Gardens ('The Botanical' building)

Assessment of Effects

1.223 Visual receptors experiencing this view would be public visiting the Botanic Gardens and the representative view would have a high susceptibility to change and a high sensitivity to the proposed development.

Effects during Construction Phase

1.224 The trees and vegetation present in the far middle ground of the view would prevent a view to the construction cranes of the proposed development, resulting in no magnitude of impact and No **Effect**.

Effects during Completed Development Stage

1.225 The view to the proposed development would be prevented due to the trees and vegetation associated with the Royal Botanic Gardens, resulting in no magnitude of impact and No **Effect**.



Proposed

View 22 Kew Gardens ('The Botanical' building)

Cumulative Effects during Construction Phase

1.226 Intervening visual barriers, principally trees within Kew Gardens, prevent views of the cumulative schemes and the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

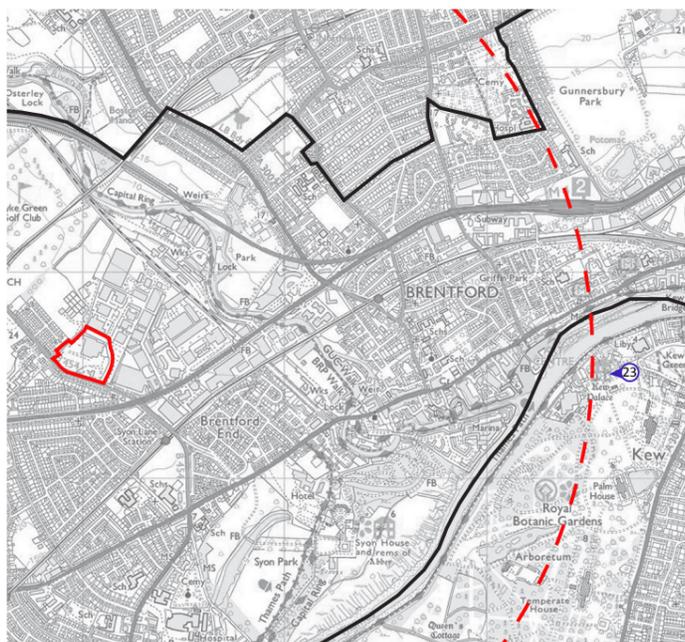
1.227 Intervening visual barriers, principally trees within Kew Gardens, prevent views of the cumulative schemes and the operational effect would remain the same.



Cumulative

View 23 Kew Gardens (west of Elizabeth Gates)

VIEWPOINT MAP



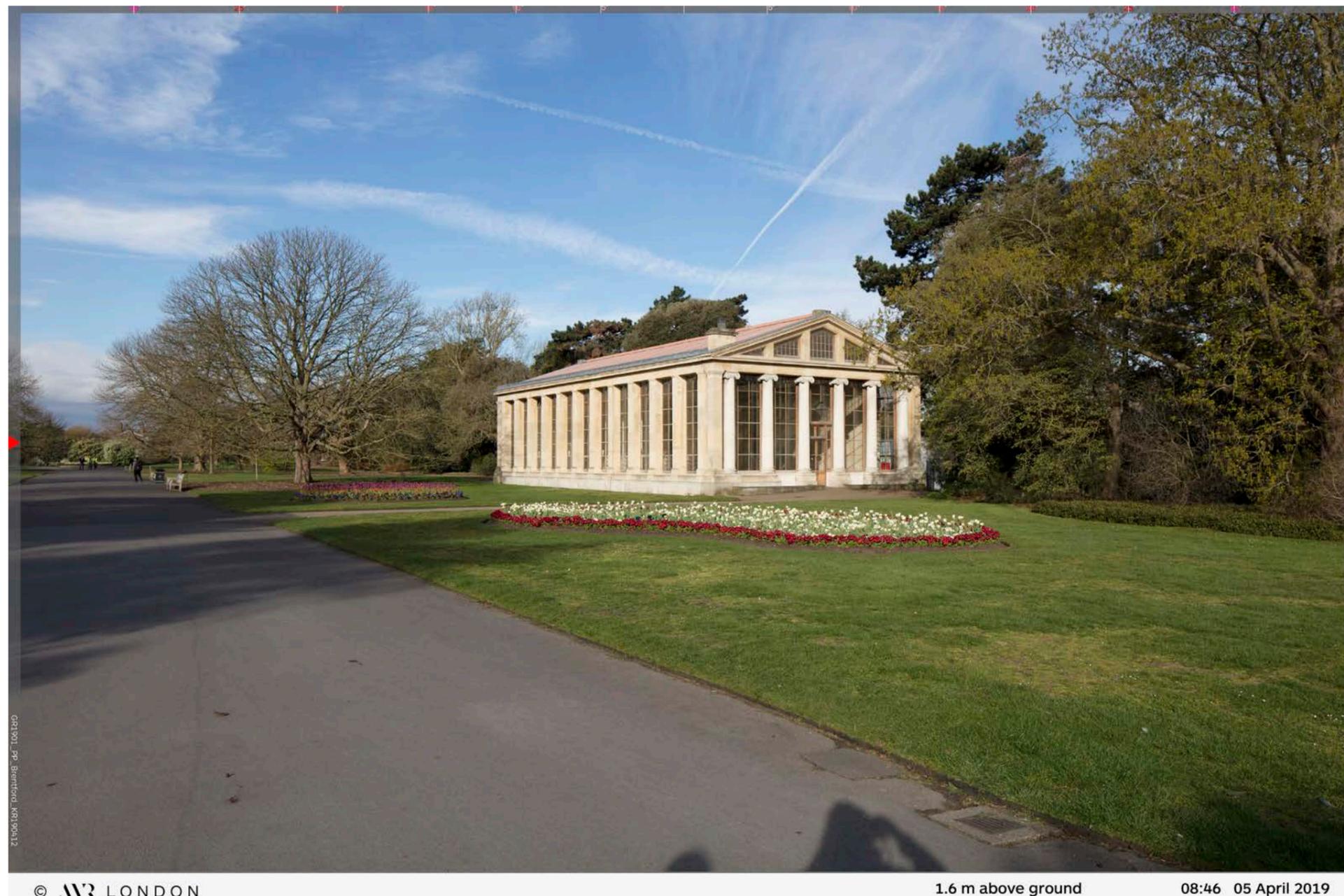
Baseline Conditions

1.228 Identified within the GWC: Appendix View Assessment (BG4 – Queen Elizabeth Gate) this representative views is located in the Royal Botanical Gardens, 2.2 km from the site. The Grade II\* listed Queen Elizabeth Gate falls behind the view.

1.229 The view is identified in the Royal Botanical Gardens World Heritage site Management Plan and is located at one of the main entrances and exits to the Royal Botanical Gardens for visitors. Its viewpoint is positioned at the first major intersection as visitors enter the gardens. The Grade II\* listed Aroid House Number 1 is visible to the north (right) of the view.

1.230 The view is dominated by the wide avenue of the Broad Walk and lined with formal lawns, trees and areas of ornamental planting, which provides a long linear view. The significant amount of tree cover in the gardens mean that views towards the site are screened.

1.231 The representative view is located within a World Heritage site, Registered Park and Garden and part of a conservation area. It is considered to have an exceptional value.



Existing

View 23 Kew Gardens (west of Elizabeth Gates)

Assessment of Effects

1.232 Visual receptors experiencing this view would be public visiting the Botanic Gardens and the representative view would have a high susceptibility to change and a high sensitivity to the proposed development.

Effects during Construction Phase

1.233 Aroid House Number 1 present in the middle ground of the view would prevent a view to the construction cranes of the proposed development, resulting in no magnitude of impact and No **Effect**.

Effects during Completed Development Stage

1.234 The view to the proposed development would be prevented due to the built form of Aroid House Number 1, resulting in no magnitude of impact and No **Effect**.



Proposed

View 23 Kew Gardens (west of Elizabeth Gates)

Cumulative Effects during Construction Phase

1.235 Aroid House Number 1 prevents a view to the cumulative schemes and the construction effect would remain the same.

Cumulative Effects during Completed Development Stage

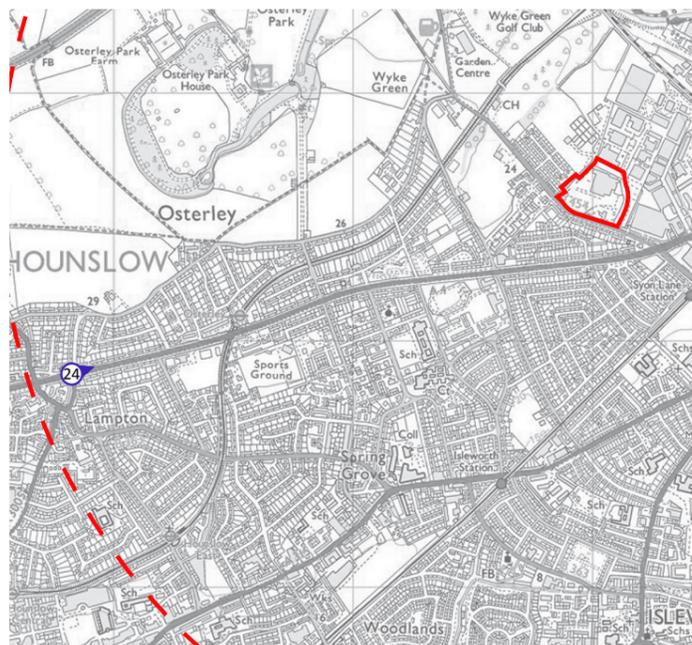
1.236 Aroid House Number 1 prevents a view to the cumulative schemes and the operational effect would remain the same.



Cumulative

View 24 Junction of GWR and Jersey Road

VIEWPOINT MAP



Baseline Conditions

1.237 This typical, long distance, townscape representative view is positioned at the junction of Great West Road and Jersey Road, approximately 2.1 km west of the site.

1.238 This open linear view is taken from the central pedestrian crossing of the Great West Road, which extends from the fore to background of the view and consist of five vehicular lanes and wide pavements that include footpaths, cycleway and grass verges. The road is framed by two storey, semi-detached, residential properties, set within generous front gardens, many including semi-mature and mature trees.

1.239 In the far background the top of the Former Gillette Factory clock tower punctuates the linear view of the Great West Road. Whilst to the southeast (right) of the view the spire of the Church of St Mary's can be glimpsed.

1.240 The experience of the view is influenced by the noise of vehicles using the Great West Road and it is considered to have a poor value.



Existing

View 24 Junction of GWR and Jersey Road

Assessment of Effects

1.241 The representative view would have a low susceptibility to change and a low sensitivity to the proposed development.

Effects during Construction Phase

1.242 There may be glimpses of the cranes associated with the construction of the proposed development from this representative view. It would have a local, direct, medium term, temporary, very low magnitude of impact. Through combining this magnitude of impact with the low sensitivity the construction stage of the proposed development would have **Negligible** Adverse effect.

Effects during Completed Development Stage

1.243 The view to the proposed development would be prevented due to intervening built form, resulting in no magnitude of impact and **No Effect**.



Proposed

View 24 Junction of GWR and Jersey Road

Cumulative Effects during Construction Phase

1.244 The construction of the proposed development would, subject to programming and phasing, be read in conjunction with the construction cranes of cumulative scheme ref. 9 (Homebase, Syon Lane). The construction effect would remain the same.

Cumulative Effects during Completed Development Stage

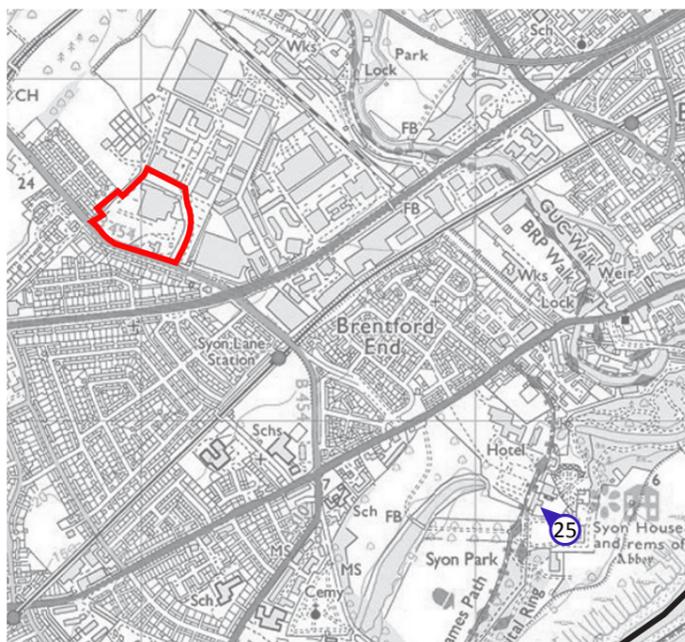
1.245 Intervening built form blocks views of the cumulative schemes and the operational effect would remain the same.



Cumulative

View 25 Syon House (east entrance)

VIEWPOINT MAP



Baseline Conditions

1.246 Taken from the portico of Syon House this representative view is located 1.4 km to the southwest of the site. The Grade I listed Syon House falls behind the viewpoint, which falls within the Grade I registered Syon Park, Isleworth Riverside Conservation Area and the buffer zone surrounding the Royal Botanic Gardens World Heritage site.

1.247 The foreground of the view takes in the entrance drive, lawn and one of the two Grade I listed Gate Lodges to the west (left). Whilst to the northwest (centre) of the view the boundary wall and greenhouses of Wyevale Garden Centre can be glimpsed along with Syon House's Visitor Centre. The latter is the Grade II Listed Former Riding School.

1.248 The northern tree line that frames the Lime Avenue leading to the trout Fishery Pond can be seen to the middle ground to the west of the view. Dense vegetation associated with the park boundary terminate the view. The site is not visible due to existing vegetation.

1.249 The representative view has a generally high scenic value and is considered to have an overall high value as it is taken from a Grade I registered Park which is also part of a conservation area. The view to the west takes in the Lime Avenue and is a designed vista.



Existing

View 25 Syon House (east entrance)

Assessment of Effects

1.250 Visual receptors experiencing this view would be the people visiting the park and the representative view would have a high susceptibility to change and a high sensitivity to the proposed development.

Effects during Construction Phase

1.251 There may be glimpses of the cranes associated with the construction of the proposed development from this representative view. It would have a local, direct, medium term, temporary, very low magnitude of impact. Through combining this magnitude of impact with the low sensitivity the construction stage of the proposed development would have **Negligible** Adverse effect.

Effects during Completed Development Stage

1.252 There may be limited glimpses of the top of Block H during winter months when intervening trees are bare of leaves. Overall the proposed development would have a local, direct, permanent, very low magnitude of impact. Therefore, through combining this magnitude of impact with the high sensitivity, the proposed development would have a **Negligible Neutral** effect.



Proposed

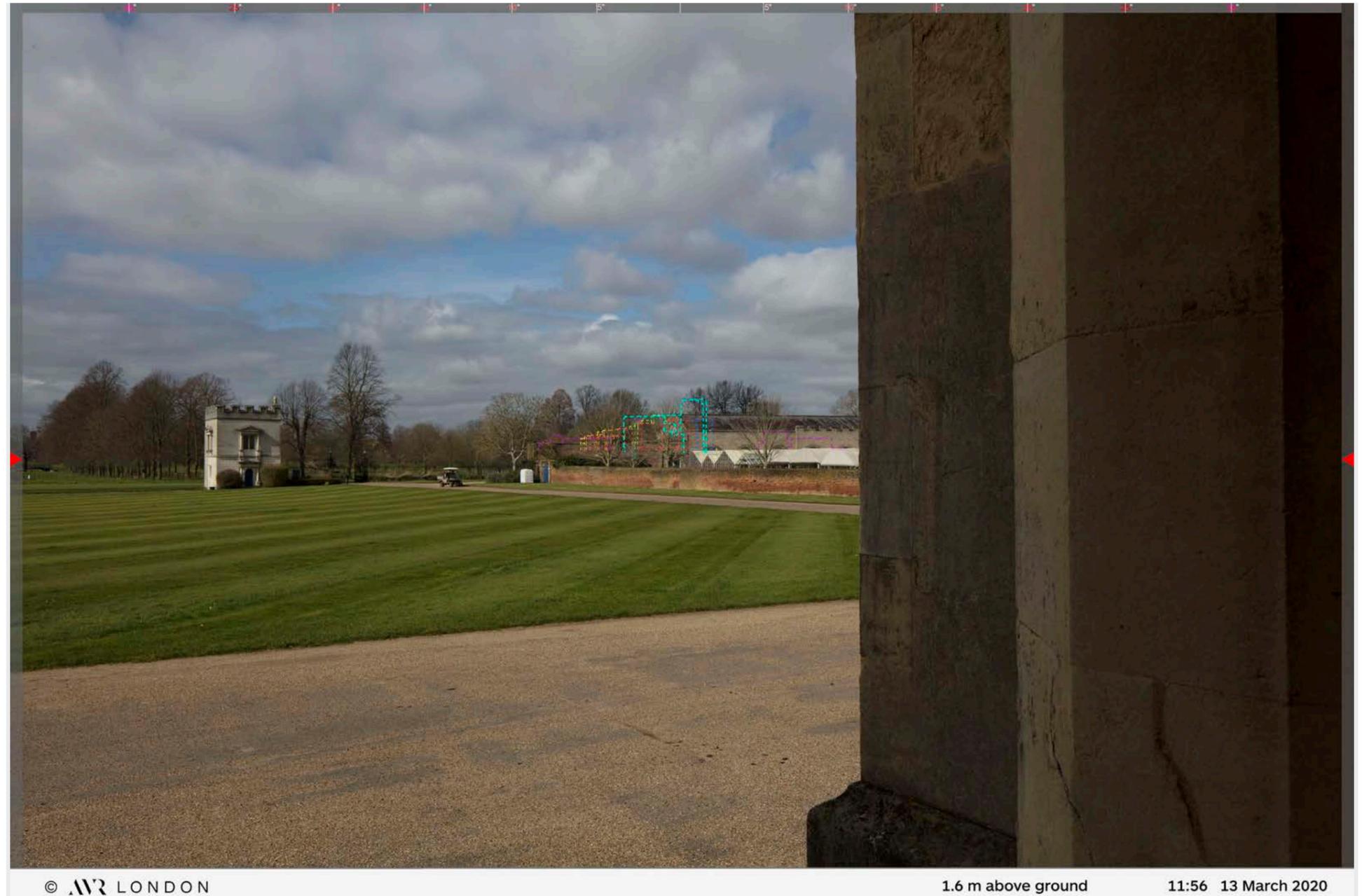
View 25 Syon House (east entrance)

Cumulative Effects during Construction Phase

1.253 The construction of the proposed development would, subject to programming and phasing, be read in conjunction with the construction cranes of cumulative scheme ref. 9 (Homebase, Syon Lane). The construction effect would remain the same.

Cumulative Effects during Completed Development Stage

1.254 There would be glimpsed views of the upper storeys of cumulative scheme ref. 9 (Homebase, Syon Lane), however the operational effect would remain the same.



Cumulative



**Technical Appendix 1.4**

**Viewpoint 2 with Central Horizon**

View 02 Junction of Syon Lane and Great West Road (A4)



Existing

View 02 Junction of Syon Lane and Great West Road (A4)



Proposed



## Technical Appendix 1.5

### Accurate Visual Representations Methodology

## AVR LONDON VERIFIED VIEW METHODOLOGY

**Project:** Tesco Brentford

**Date:** July 2020

AVR London was commissioned by the client to produce a number of verified views of the proposals for Tesco Brentford. The AVR positions were identified by Arc Landscape Design and Planning Ltd.

2D plans, Ordnance Survey Mapping, local survey data, and the 3D model for the proposed development were provided by JTP Architects.

### 1. Photography

#### Equipment

Canon 5DMKII / 5DS / 5DSR  
 Canon TS-E 24mm f/3.5L II  
 Canon 50mm f/1.4L

1.1 All photography is undertaken by AVR London's in-house professional photographers.

1.2 In professional architectural photography, having the camera level with the horizon is desirable in order to prevent three point perspective being introduced to the image and to ensure the verticals within the photographed scene remain parallel. This is standard practice and more realistically reflects the viewing experience.

1.3 The lens used by the photographer has the ability, where necessary, to shift up or down while remaining parallel to the sensor, allowing for the horizon in the image to be above, below or central within the image whilst maintaining two point perspective. This allows the photographer to capture the top of a taller proposed development which would usually be cropped, without introducing three point perspective.

When the shift capability of the lens is not used the image FOV and dimensions are the same as a prime lens of equal focal length.

1.4 Once the view positions are confirmed by the townscape consultant, AVR London takes professional photography from each location. At each location the camera is set up over a defined ground point using a plumb line to ensure the position can be identified later.

1.5 The centre of the camera lens is positioned at a height of 1.60 metres above the ground to simulate average viewing height. For standard verified photography, each view is taken with a lens that gives a 68 degree field of view, approximately, a standard which has emerged for verified architectural photography. The nature of digital photography means that a record of the time and date of each photograph is embedded within the photo file; this

metadata allows accurate lighting timings to be recreated within the computer model.

1.6 Once the image is taken, the photographer records the tripod location by photographing it in position to ensure the position can be accurately located for surveying (figure 1).

1.7 Each image is processed by the photographer to ensure it visually matches the conditions on site when the photograph is taken.

1.8 For 360 degree photography a panoramic head is used to ensure the lens is orientated around the nodal point preventing parallax distortion and an overlap of 33 - 50% is maintained between images to provide adequate control points for stitching. The camera/lens is set up in portrait orientation to provide greater vertical context.

1.9 Night time photography is taken after 'astronomical twilight', officially night, once the sun is 18 degrees below the horizon, to ensure all the images are at the same level of darkness. View positions are visited in daylight before the night photos are taken so the photographer is familiar with the locations and environment. Head torches are often used to ensure safe working. Ground positions are clearly marked by the surveyor (using pins, stakes and UV paint) in daylight before night photography commences. This ensures positions can be identified consistently in the dark by the photographers. GPS is also used if necessary. The photographs are exposed to accurately represent the lighting conditions experienced by the photographer

onsite. Stitching of night time 360 degree photography is completed using proprietary stitching software which brightens each image to ensure accuracy of control points before returning it to the original exposure.

#### Regarding 24mm focal length in an urban environment

1.10 When we observe a scene, we can focus on 6-10degrees, however, without moving our head, the scene beyond is observed using our peripheral vision. Once we move our eyes we can observe almost 180degrees without moving our head. In reality we do not view the world through one fixed position, we move our eyes around a scene and observe, height, width and depth.

This is acknowledged by the Landscape Institute's Technical Guidance Note, Visual Representation of Development Proposals. The appreciation of the wider context seen through peripheral vision or by moving our eyes (changing the focal point) is key to our experience of a scene.

While photography cannot replicate the human experience entirely, it is widely acknowledged that the use of a 24mm lens in an urban environment allows the viewer a more realistic experience than a 50mm lens. For this reason the 24mm lens is used as standard in the creation of urban photo montage as outlined by the London View Management Framework (2012).

POINT ID	EASTING	NORTHING	HEIGHT	POINT DESCRIPTION	VIEW NO.
2	516233.617	177341.591	22.021	Camera position for View 2a at ground height	VIEW 2
201	516158.37	177367.698	31.954	Top right corner of chimney	VIEW 2
202	516185.493	177365.293	28.106	Top left corner of canopy	VIEW 2
203	516220.242	177346.559	22.096	Bottom left corner of roadmarking	VIEW 2
204	516171.212	177367.257	26.225	Top right corner of white building	VIEW 2
205	516218.724	177349.815	23.394	Top left corner of railing	VIEW 2
206	516185.24	177377.027	26.567	Top left corner of v-power sign	VIEW 2
207	516223.198	177351.283	23.287	Bottom right corner of yellow traffic controller	VIEW 2
208	516223.062	177351.213	25.989	Top center of traffic light post	VIEW 2
209	516227.888	177352.342	23.259	Top left corner of railing	VIEW 2
210	516199.866	177389.41	28.434	Top left corner of shell sign	VIEW 2
211	516227.722	177352.815	25.54	Top right corner pedestrian crossing light	VIEW 2
212	516207.886	177408.372	25.697	Top right corner of roadname board	VIEW 2
213	516216.935	177435.071	65.921	Center of clockface	VIEW 2
214	516212.608	177433.823	35.327	Top left corner of concrete on building face	VIEW 2
215	516227.37	177376.606	23.773	Top right corner of electric junction box	VIEW 2

Table 1: Surveying data



Figure 1: Tripod location as documented by photographer



Figure 2: Survey points as highlighted by surveyor

## AVR LONDON VERIFIED VIEW METHODOLOGY

### 2. Survey

#### Equipment

*Leica Total Station Electronic Theodolite which has 1" angle measuring accuracy and 2mm + 2ppm distance accuracy.*

*Leica Smart Rover RTK Global Positioning System.*

*Wild/Leica NAK2 automatic level which a standard deviation of +/- 0.7mm/km*

2.1 The photographer briefs the surveyor, sending across the prepared photographs, ground positions and appropriate data.

2.2 The surveyor establishes a line of sight, two station baseline, coordinated and levelled by real time kinetic GPS observations, usually with one of the stations being the camera location. The eastings and northings are aligned to the Ordnance Survey National Grid (OSGB36) and elevation to Ordnance Survey Datum (OSD) using the OSTN15 GPS transformation program.

2.3 Once the baseline is established, a bearing is determined and a series of clearly identifiable static points across the photograph are observed using the total station. These observations are taken throughout the depth of field of the photograph and at differing heights within the image.

2.4 The survey control stations are resected from the OS base mapping and wherever possible, linked together to form a survey network. This means that survey information is accurate to tolerances quoted by GPS survey methods in plan and commensurate with this in level.

2.5 Horizontal and vertical angle observations from the control stations allow the previously identified points within the view to be surveyed using line of sight surveying and the accurate coordination of these points determined using an intersection program. These points are then related back to the Ordnance Survey grid and provided in a spreadsheet format showing point number, easting, northing and level of each point surveyed, together with a reference file showing each marked up image (Figure 2 and Table 1).

2.6 The required horizon line within the image is established using the horizontal collimation of the theodolite (set to approximately above the ground) to identify 3 or 4 features that fall along the horizon line.

2.7 Using the surveyed horizon points as a guide, each photograph is checked and rotated, if necessary, in proprietary digital image manipulation software to ensure that the horizon line on the photograph is level and coincident with the information received from the surveyor.



Figure 3: Example AVR London graticule

### 3. Accurate Visual Representation Production

#### Process

3.1 The 3D computer model is precisely aligned to a site plan on the OS coordinate grid system.

3.2 Within the 3D software a virtual camera is set up using the coordinates provided by the surveyor along with the previously identified points within the scene. The virtual camera is verified by matching the contextual surveyed points with matching points within the overlaid photograph. As the surveyed data points, virtual camera and 3D model all relate to the same 3-dimensional coordinate system, there is only one position, viewing direction and field of view where all these points coincide with the actual photograph from site. The virtual camera is now verified against the site photograph.

3.3 For fully-rendered views a lighting simulation (using accurate latitude, longitude and time) is established within the proprietary 3D modelling software matching that of the actual site photograph. Along with the virtual sunlight, virtual materials are applied to the 3D model to match those advised by the architects. The proprietary 3D modelling software then uses the verified virtual camera, 3D digital model, lighting and material setup to produce a computer generated render of the proposed building.

3.4 The proposal is masked where it is obscured behind built form or street furniture.

3.5 Using the surveyed information and verification process described above, the scale and position of a proposal with a scene can be objectively calculated. However, using the proprietary software currently available the exact response of proposed materials to their environment is subjective so the exact portrayal of a proposal is a collaboration between illustrator and architect. The final computer generated image of the proposed building is achieved by combining the computer-generated render and the site photography within proprietary digital compositing software.

### 4. Presentation

#### Graticule

4.1 Each Accurate Visual Representation is framed by a graticule which provides further information including time and date of photography, horizon markers and field of view of the lens (Figure 3).

4.2 The Field of View is represented along the top of the image in the form of markers with degrees written at the correct intervals.

4.3 The horizon markers indicate where the horizontal plane of view from the camera lies, this is defined as described above, by the surveyor.

4.4 The date and time stamp documents the time the photograph was taken and this information is taken directly from the EXIF data of the camera.

### 5. References

5.1 GLA - London View Management Framework: Supplementary Planning Guidance (2012)

5.2 Landscape Institute - Visual Representation of Development Proposals - Technical Guidance Note (September 2019)

5.3 Landscape Institute - Guidelines for Landscape and Visual Impact Assessment: 3rd edition (April 2013)

## AVR LONDON VERIFIED VIEW METHODOLOGY

View	Location	Render/ Wireline	Single/ Multiple	Panels	Camera Height	Date	Time	Lens (mm)	Horizontal FOV	Easting	Northing	Elevation	Compass Direction	Distance to site (approx)
1	Syon Lane Station	Wireline	Single	1	1.6m	11 March 2019	13:50	24mm	73 degrees	516432.673	177219.628	17.376	NW	112m
2	Junction of Syon Lane and Great West Road (A4)	Wireline	Single	1	1.6m	13 August 2019	09:54	24mm	73 degrees	516298.394	177358.989	21.270	NW	369m
3	Boston Manor Park (footpath)	Wireline	Single	1	1.6m	12 February 2020	14:07	24mm	73 degrees	516843.432	177893.381	7.41	WSW	891m
4	Goals Gillette Corner Sportsfield	Wireline	Single	1	1.6m	08 August 2019	17:17	24mm	73 degrees	515872.082	177975.185	21.253	SSE	390m
5	Oaklands Avenue	Wireline	Single	1	1.6m	12 February 2020	15:04	24mm	73 degrees	515757.047	177793.193	23.857	SE	300m
6	Pavement of Great West Road (A4)	Wireline	Single	1	1.6m	08 September 2019	16:03	24mm	73 degrees	515965.21	177304.516	23.139	NNE	307m
7	Osterley Park (entrance)	Wireline	Single	1	1.6m	05 April 2019	15:26	50mm	39 degrees	514800.61	177639.27	26.79	E	1650m
8	Osterley Park (centre)	Wireline	Single	1	1.6m	05 April 2019	15:47	50mm	39 degrees	514830.491	178135.712	24.077	ESE	1782m
9	Osterley Park (Osterley Park House)	Wireline	Single	1	1.6m	11 March 2019	15:03	24mm	73 degrees	514534.287	178016.746	29.131	ESE	1996m
10	Osterley Park (Bridleway)	Wireline	Single	1	1.6m	05 April 2019	16:13	50mm	39 degrees	515143.780	178365.046	23.652	SE	1638m
11	Boston Manor	Wireline	Single	1	1.6m	11 March 2019	10:27	24mm	73 degrees	516832.004	178316.770	16.938	SW	1115m
12	St Paul's Recreation Ground	Wireline	Single	1	1.6m	10 April 2019	11:40	24mm	73 degrees	517905.526	177670.846	6.952	WSW	1526m
13	Syon Park (Gate Lodge)	Wireline	Multiple	3	1.6m	11 March 2019	12:44	24mm	73 degrees	517138.834	176670.205	5.803	NW	975m
14	Syon Park southern entrance footpath (north)	Wireline	Multiple	3	1.6m	11 March 2019	12:29	24mm	73 degrees	517007.608	176364.107	6.355	NW	1127m
15	Syon Park southern entrance footpath (south)	Wireline	Multiple	3	1.6m	11 March 2019	12:17	24mm	73 degrees	516899.695	176228.475	6.988	NNW	1200m
16	Riverside Walk Isleworth	Wireline	Single	1	1.6m	10 April 2019	12:16	24mm	73 degrees	516653.824	175670.559	5.100	N	1582m
17	Riverside Walk Kew	Wireline	Single	1	1.6m	10 April 2019	12:53	24mm	73 degrees	516918.339	175979.220	4.826	NNW	1410m
18	Northern footpath along A316	Wireline	Single	1	1.6m	05 April 2019	09:29	24mm	73 degrees	517583.250	175220.263	8.185	NNW	2439m
19	Kew Gardens, Cedar Vista east	Wireline	Single	1	1.6m	11 March 2019	09:30	24mm	73 degrees	Alignment based on zmap data			NW	2131m
20	Kew Gardens, Syon Vista/Cedar Vista west	Wireline	Single	1	1.6m	11 March 2019	07:42	24mm	73 degrees	517829.19	176641.33	5.98	WNW	1564m
21	Kew Gardens (west of the Palm House)	Wireline	Single	1	1.6m	11 March 2019	08:23	24mm	73 degrees	518636.656	176941.926	6.487	W	2246m
22	Kew Gardens ('The Botanical' building)	Wireline	Single	1	1.6m	11 March 2019	08:39	24mm	73 degrees	518830.416	177014.062	5.978	W	2428m
23	Kew Gardens (west of Elizabeth Gates)	Wireline	Single	1	1.6m	05 April 2019	08:46	24mm	73 degrees	518717.481	177529.237	5.737	W	2298m
24	Junction of GWR and Jersey Road	Wireline	Single	1	1.6m	17 July 2019	13:08	24mm	73 degrees	513816.027	176858.385	28.085	ENE	2647m
25	Syon House (east entrance)	Wireline	Single	1	1.6m	13 March 2020	11:56	24mm	73 degrees	517258.39	176665.42	7.46	NW	1069m



**Technical Appendix 1.6**  
**Illustrative Renders**

View 08 Osterley Park (centre)



GR1901\_PP\_Brentford\_KR191020

© AR LONDON

1.6 m above ground

15:47 05 April 2019



GR1901\_PP\_Brentford\_KR190801

© AR LONDON

1.6 m above ground

12:44 11 March 2019

View 14 Syon Park southern entrance footpath (north)



GR1901\_pp\_Brentford\_KR190801

© AR LONDON

1.6 m above ground

12:29 11 March 2019

View 15 Syon Park southern entrance footpath (south)



GR1901\_pp\_Brentford\_KR190412

© AR LONDON

1.6 m above ground

12:17 11 March 2019

# 2 BUILT HERITAGE

## Introduction

- 2.1 This chapter of the ES reports on the likely significant effects to arise from the demolition and construction stage and from the completed development stage of the proposed development on built heritage. The assessment considers direct effects on the significance of individual built heritage assets within the surrounding study area (including World Heritage Sites, Statutorily Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Locally Listed Buildings), as well as indirect effects through change in their settings. For the purposes of this assessment, the term 'built' heritage refers to above-ground heritage assets only.
- 2.2 The chapter describes the built heritage policy context; the methods used to assess the potential impacts and likely effects; the baseline conditions at and surrounding the site; the likely built heritage effects taking into consideration embedded mitigation; the need for additional mitigation and enhancement; the significance of residual effects; and inter-project cumulative effects.
- 2.3 The chapter is supported by the following technical appendix:
- Appendix 2.1: Historic Environment Assessment.

## Methodology

- 2.4 The assessment has been informed by the following legislation, policies and published guidance:
- National Legislation and Policy:
    - The Planning (Listed Buildings and Conservation Areas) Act 1990<sup>1</sup>;
    - NPPF<sup>2</sup>;
    - PPG (July 2019)<sup>3</sup>;
  - Regional Policy:
    - London Plan (2016)<sup>4</sup>; in particular policies '7.4 - Local Character'; '7.7 - Location and Design of Tall and Large Buildings'; '7.8 - Heritage Assets and Archaeology'; '7.9 - Heritage-led Regeneration'; '7.1 - World Heritage Sites'; and '7.12 - The London View Management Framework';
    - Intend to Publish London Plan (2019)<sup>5</sup> in particular policies 'HC1 - Heritage Conservation and Growth'; 'HC2 - World Heritage Sites'; 'HC3 - Strategic and Local Views'; and 'HC4 - London View Management Framework';
    - London View Management Framework Supplementary Planning Guidance (LVMF SPG), (2012)<sup>6</sup>
    - London's World Heritage Sites – Guidance on Settings SPG, (2012)<sup>7</sup>;

- Local Policy:
  - Hounslow Local Plan 2015 to 2030 Volume One (2015)<sup>8</sup>; in particular policies 'CC3 - Tall Buildings' and 'CC4 - Heritage';
  - Great West Corridor Local Plan Review (2019)<sup>9</sup> in particular GWC5 'Design and Heritage';
  - Hounslow Planning Obligations and CIL Supplementary Planning Document (2015)<sup>10</sup>.
- Guidance and Industry Standards:
  - Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008)<sup>11</sup>;
  - Good Practice Advice in Planning Note: Managing Significance in Decision-Taking in the Historic Environment (GPA 2) (2015)<sup>12</sup>;
  - Good Practice Advice in Planning: The Setting of Heritage Assets (GPA 3) (2017)<sup>13</sup>;
  - Planning Practice Guidance: Historic Environment (July 2019)<sup>14</sup>;
  - Principles of Selection for Listing Buildings (2018)<sup>15</sup>; and
  - Tall Buildings: Historic England Advice Note 4 (2015)<sup>16</sup>.

2.5 Further details are provided in Technical Appendix 2.1: Heritage Statement of this Volume.

## Consultation

- 2.6 An EIA Scoping Report<sup>17</sup> was submitted to the LBH on 31 July 2019 in support of a request for a formal EIA Scoping Opinion (provided in Technical Appendix 2.1, ES Volume 3). The LBH issued an EIA Scoping Opinion on 13 September 2019 (Technical Appendix 2.2, ES Volume 3). Two further Scoping update letters were issued by Ramboll to LBH to confirm that subsequent design changes did not affect the originally proposed scope of the EIA and therefore the EIA Scoping Report and LBH EIA Scoping Opinion remain valid.
- 2.7 Table 2.1 summarises the consultation that has been undertaken with respect to the built heritage assessment.

<b>Consultee and Form/ Date of Consultation</b>	<b>Summary of Comments</b>	<b>Where in this Chapter Comments are addressed</b>
LBH, Scoping Opinion (13 September 2019)	The proposed scope is generally agreed, subject to a detailed explanation of the methodology used to produce any visual representations of the proposal within the townscape and setting of heritage assets.	Assessment Scope Section of this Chapter, as well as Technical Appendix 1.5 of this Volume

<sup>1</sup> Secretary of State, 1990. The Planning (Listed Buildings and Conservation Areas) Act 1990. London. HMSO.  
<sup>2</sup> Ministry of Housing, Communities and Local Government, 2019. National Planning Policy Framework. London. HMSO.  
<sup>3</sup> Ministry of Housing, Communities and Local Government, 2019. Planning Practice Guidance [online]. Available from: <https://www.gov.uk/government/collections/planning-practice-guidance>  
<sup>4</sup> Greater London Authority, 2016. The London Plan: The Spatial Development Strategy for London Consolidation with Alterations since 2011. London. Greater London Authority.  
<sup>5</sup> Greater London Authority, 2019. London Plan Intending to Publish version. London. Greater London Authority.  
<sup>6</sup> Greater London Authority, 2012. London View Management Framework Supplementary Planning Guidance. London. Greater London Authority.  
<sup>7</sup> Greater London Authority, 2012. London's World Heritage Sites - Guidance on Settings Supplementary Planning Guidance. London. Greater London Authority.  
<sup>8</sup> London Borough of Hounslow, 2015. Hounslow Local Plan 2015 – 2030. London. Hounslow Council.  
<sup>9</sup> London Brough of Hounslow, 2019. Great West Corridor Local Plan Review, Pre-Submission Regulation 19 Consultation, July 2019.

<sup>10</sup> London Borough of Hounslow, 2015. Planning Obligations and CIL Supplementary Planning Guidance. London. Hounslow Council  
<sup>11</sup> English Heritage, 2008. Conservation Principles Policies and Guidance. London. English Heritage.  
<sup>12</sup> Historic England, 2015. Managing Significance in Decision-taking in the Historic Environment, Good Practice Advice in Planning Note 2, March 2015. London. Historic England.  
<sup>13</sup> Historic England, 2017. The setting of heritage assets: Historic Environment, Good Practice Advice in Planning Note 3. London. Historic England.  
<sup>14</sup> Ministry of Housing, Communities and Local Government, 2019. Planning Practice Guidance: Historic Environment, published 10 April 2014, last updated 23 July 2019. London. MHCLG.  
<sup>15</sup> Department for Digital, Culture, Media and Sport, 2018. Principles of Selection for Listing Buildings. London. DCMS.  
<sup>16</sup> Historic England, 2015. Tall Buildings: Historic England Advice Note 4. London: Historic England.  
<sup>17</sup> Ramboll, 2019. Osterley Tesco, Syon Lane, Isleworth: Environmental Impact Assessment Scoping Report, July 2019.

**Table 2.1: Summary of Consultation**

Consultee and Form/ Date of Consultation	Summary of Comments	Where in this Chapter Comments are addressed
	Consideration of effects on the setting of heritage assets can be undertaken utilising the viewpoints considered in Table 7.1 of the EIA Scoping Report. Assessment should consider those identified in Conservation Area appraisals, London Borough of Richmond's Proposals Map, Thames Landscape Strategy, Royal Botanic Gardens World Heritage Site Management Plan and the Great West Corridor View Appendix (July 2019) from Historic England are given in the appendix.	
Historic England (Inspector of Historic Buildings and Areas Alexander Bowring) pre-application consultation 17 February 2020.	Written response from HE (28 May 2020) recommended "further analysis of significance in order to better understand the impact of the development and inform design revisions to avoid or minimise harm." Historic England also referred to a 1749 Canaletto painting of Syon House from the south east, on the eastern tow path of the Thames and any effect upon this view.	Historic England's comments have been addressed in-depth in Appendix 2.1: Historic Environment Assessment. Visual analysis is included in Volume 2, Chapter 1: Townscape and Visual Impact Assessment. This work has informed the assessment methodology.

## Assessment Scope

- 2.8 There is no published guidance for built heritage assessment in EIA. Accordingly, the assessment has been informed by the policy context and specialist guidance as listed in the preceding section, as well as professional experience/judgement.
- 2.9 'Heritage assets' are as defined by the NPPF. Designated heritage assets include Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and Registered Landscapes. Locally Listed Buildings are 'non-designated heritage assets'. Historic environment and planning legislation identifies the significance of heritage assets and the contribution that setting makes to that significance. Accordingly, this assessment considers both likely direct (i.e. on the assets) and indirect (i.e. on the settings, views and visual appearance of the assets) impacts and effects. In this assessment, the identified heritage assets are also referred to as 'receptors' where appropriate.
- 2.10 Setting is not a heritage asset and not a heritage designation. Its importance lies in what it may, or may not, contribute to the significance of a heritage asset. On this basis, the heritage assets assessed in this chapter comprise the settings of those heritage assets which may be affected by the proposed development.
- 2.11 The term '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. Significance derives not only from a heritage asset's physical presence, but also from its setting". Historic England's advice note (GPA 2) provides an alternative definition as "...the sum of its architectural, historic, artistic or archaeological interest". These definitions are complementary and non-exclusive and so both are applied in considering this facet of an asset's interest.

## Technical Scope

- 2.12 This assessment is focussed upon the nature and degree of the impact of the proposed development on the heritage significance (as defined by Historic England's 'Conservation Principles' and the NPPF) of the heritage assets identified by this assessment, with particular emphasis on the effect on their setting as

a component of heritage significance. Heritage assets vary in their sensitivity depending on their levels of heritage significance and their proximity to the site and to the proposed development.

- 2.13 Townscape and visual and built heritage assessments are separate, although linked, procedures. The townscape and visual baseline analysis contributes to the scope of the built heritage assessment and built heritage assets contribute to the character and appearance of the townscape character and representative views. The townscape and visual assessment in turn contributes to the understanding of likely significant effects on the settings of built heritage assets. The townscape and visual impact assessment (TVIA) is provided in Chapter 1 of this ES Volume.
- 2.14 The methodology for assessing the effects of the proposed development upon heritage assets is to (i) define an appropriate study area, (ii) identify relevant heritage assets within that area, and (iii) measure the effect of the proposed development upon these assets using criteria contained in legislation and national and local policy and guidance relating to the historic built environment.

## Spatial Scope

- 2.15 The area of existing context likely to be affected by the proposed development varies with the scale and alignment of the existing context, and the scale and massing of the proposed development. For example, where streets align with the site or the site is seen across open space this can extend the zone of influence in certain areas.
- 2.16 Based on initial visual impact testing, the study area for the townscape and visual assessment covers an area approximately 1 km from the southern boundary of the site, although is extended where required to include the relevant long-distance views. This point was chosen as it is the key approach to the development from Syon Lane which, in turn, is the key axis linking between some of the areas' most sensitive heritage assets. These views are assessed in Volume 2, Chapter 1: Townscape and Visual Impact Assessment.
- 2.17 The 1 km study area is also considered appropriate for the built heritage assessment, given the vertical scale of the proposed development and the low-rise nature of much of the surrounding area. This radius is treated flexibly so as to include, for instance, the full extent of a Conservation Area or a heritage asset that may fall just outside that radius. It should be noted that this approximate zone of potential influence of the proposed development on heritage assets has been assumed as the 'worst-case' maximum likely zone of potential impact, not as the actual extent of likely impacts.

## Temporal Scope

- 2.18 The assessment has considered impacts arising during the demolition and construction stage – which are expected to be temporary and short- to medium-term (approximately 10 years; 2025 to 2035) in nature – and during the completed proposed development stage – which would be expected to be permanent and long-term in nature (i.e. more than 10 years).
- 2.19 The assessment has been undertaken against existing baseline conditions. Consideration has also been given to inter-project effects with cumulative schemes.

## Baseline Characterisation Method Desk Study

- 2.20 In order to establish baseline built heritage conditions, relevant data was reviewed and assessed. Data was obtained from the following sources:
- Historic Environment Records and National Heritage List for England;
  - Historic maps including Ordnance Survey maps;
  - Archives and repositories including the London Metropolitan Archives; and

- A range of secondary printed sources, such as Bolton *et al.* (1982)<sup>18</sup>, Cherry and Pevsner (2002)<sup>19</sup>, Clunn (1963)<sup>20</sup>, Weightman *et al.* (2007)<sup>21</sup>.

2.21 The findings of this detailed study can be found within Technical Appendix 2.1 Heritage Statement in this Volume

## Field Study

2.22 A walkover of the site and surrounding designated areas was undertaken in October 2019.

# Assessment Method

## Methodology

- 2.23 The built heritage assessment provides an assessment of the likely significant effects of the proposed development on the settings of individual heritage assets identified in the baseline and the contribution that any effect on the setting of a heritage asset would make to the significance of that asset. Designated and non-designated heritage assets further from the site, where effects on their settings are likely to be less significant, have been described and assessed only where appropriate.
- 2.24 The principle approach to assessing the effects of the proposed development upon the identified heritage assets has been to measure those effects identified against criteria contained in legislation and national and local policy and guidance relating to the historic built environment. At the centre of the assessment has been an assessment of how the heritage significance identified for each asset would be altered by the proposed development.
- 2.25 Structured, informed and reasoned professional judgement has been used to take account of quantitative and qualitative factors. This is widely accepted as best practice and has been based on an analysis of desk-based research and field assessment. It is recognised that the character of London is one of contrasts, of historic and modern buildings, and that modern buildings of high design quality do not necessarily harm the settings of heritage assets.

## Demolition and Construction Stage

- 2.26 The assessment of the likely significant effects on heritage assets resulting from the demolition and construction stage has been based upon a thorough review of the development proposals and the application of professional judgement.
- 2.27 Demolition and construction works are a necessary first step in the redevelopment of the site and one that is associated with urban environments, where development is commonplace. Demolition and construction impacts are not considered to be significant in EIA terms, as they are indirect, temporary in nature and short- to medium-term in duration.

## Completed Development Stage

- 2.28 The assessment of the likely significant effects on heritage assets resulting from the completed development stage has been based upon a thorough review of the development proposals and the application of professional judgement.
- 2.29 The effect of the proposed development on each of the identified heritage assets has been considered and a judgement formed as to the importance and sensitivity of the heritage assets (as considered in the baseline study); the magnitude of impact; and the duration, extent and scale of the effect. In doing so, consideration has been given to embedded mitigation measures, as well as accurate visual representations (AVRs) prepared of the proposed development (see ES Chapter 1: Townscape and Visual Impact Assessment, Appendix 1.3 of this Volume).

<sup>18</sup> Bolton, D.K., Croot, P and Hicks, M.A, 1982. 'Ealing and Brentford: Growth of Brentford', in A History of the County of Middlesex: Volume 7, Acton, Chiswick, Ealing and Brentford, West Twyford, Willesden, Baker and Elrington eds. (London, 1982), pp. 113-120. British History Online <http://www.british-history.ac.uk/vch/middx/vol7/pp113-120> [accessed 5 September 2019].

## Cumulative Stage

- 2.30 The assessment of the likely significant effects on heritage assets resulting from the completed development stage is based upon a thorough review of the development proposals and the application of professional judgement.
- 2.31 The effect of the proposed development plus the cumulative schemes on each of the identified heritage assets has been considered and has been based on the professional judgement formed during the completed development assessment; the magnitude of impact; and the duration, extent and scale of the effect.

# Assessment Criteria

## Assessing Significance

- 2.32 The quality in a heritage asset that is affected by change is described as 'significance' and is referred to for clarity throughout this chapter as 'heritage significance'. This incorporates the concepts of 'special architectural and historic interest' (in relation to Listed buildings and Conservation Areas) and 'character and appearance' in relation to Conservation Areas. The 'significance' of a heritage asset is a quality that may be more or less sensitive to change, depending on the specific circumstances of the asset and the nature of that change.
- 2.33 The heritage significance of heritage assets, both designated and non-designated, varies according to the nature and circumstances of the asset in question. A number of Listed Buildings at the same grade, for instance, may have greater or lesser levels of heritage significance depending on the nature of their special architectural or historic interest (i.e. the reason for listing); the degree to which the Listed Building has changed since it was listed (i.e. whether physical alteration of the building since listing has preserved or enhanced its special interest); and/or the degree to which the setting of the Listed Building has changed since listing.
- 2.34 A general classification of a heritage asset (into grades) does not therefore equate to an identical or similar level of heritage significance in every asset of the same grade. The Planning (Listed Buildings and Conservation Areas) Act 1990 does not refer to grades of Listed Buildings or Conservation Areas, referring only to 'special architectural or historic interest', and the statutory tests are applied equally to the designated heritage assets concerned. The Department for Digital, Culture, Media and Sport's 'Principles of Selection for Listing Buildings' states that Listed Buildings are graded to reflect their relative special architectural and historic interest. Grading therefore provides a helpful general indication of a level of heritage significance, and that has been used in assessing the sensitivity of heritage assets to change.
- 2.35 The heritage significance of a Listed Building (or structure) that may be affected is its special architectural and historic interest. More precisely, a development may affect this special architectural and historic interest by harming or reducing the degree to which such interest can be appreciated (i.e. the potential impact).
- 2.36 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 the proposed development in their setting. On the contrary, the visibility of new development is frequently a highly positive quality, signalling regeneration and assisting in place-making.
- 2.37 The heritage significance of a Conservation Area that may be affected by a proposed development is its 'character and appearance'. Conservation Areas are defined in the Planning (Listed Buildings and Conservation Areas) Act 1990 as being "...areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance". A development may affect this character

<sup>19</sup> Cherry, B. and Pevsner, N., 2002. The Buildings of England. London 3: North West. London: Yale University Press.

<sup>20</sup> Clunn, H., 1963. The Face of London. London: Spring Books.

<sup>21</sup> Weightman, G., Humphries, S., Mack, J., 2007. The Making of Modern London. London: Sidgwick & Jackson.

and appearance by harming or reducing the degree to which these qualities can be appreciated (the potential impact).

2.38 The heritage significance of Locally Listed Buildings or buildings considered to make a beneficial contribution to the character and appearance of Conservation Areas that may be affected (the potential impact) is their general (not special) architectural and historic interest.

2.39 The methodology adopted to assess the potential impacts of the proposed development upon the heritage significance of the heritage assets is to measure those impacts, using professional judgement, against criteria contained in national and local policy and guidance relating to the historic built environment.

### Receptor Sensitivity/Value Criteria

2.40 It should be noted that the various policy and guidance relating to the historic built environment (either national, regional or local) do not provide a definitive system of measurement of effects upon heritage assets. There is no fixed or agreed system of measuring the sensitivity of heritage assets to change and the magnitude of that change. Sensitivity is relative to each particular built heritage asset. As such, for this assessment, sensitivity has been viewed as a function of the following:

- The inherent importance of the built heritage asset as defined by available measures of its significance (such as a listing description for a Listed Building or a Conservation Area Appraisal for a Conservation Area) or in the case of a non-designated heritage asset by its inclusion in a Local List; and
- The location of the built heritage asset and its relationship to a development. This takes account of topography and landscape features.

2.41 The sensitivity of receptors has been classified as low, medium or high, in accordance with the criteria set out in Table 2.2.

Sensitivity	Criteria
Low	The receptor is tolerant of change without detriment to its character or is of low or local importance. Change can occur in the circumstances of the receptor without having a significant or any effect on the receptor's heritage or townscape value.
Medium	The receptor has moderate capacity to absorb changes without significantly altering its present character. Some change in its circumstances may have an effect that, depending on the magnitude of that change, may or may not be significant. This sensitivity is typical for Listed Buildings Grade II and their settings, Conservation Areas and their settings, and registered Historic Parks and Gardens Grade II and their settings.
High	The receptor has little ability to absorb change without fundamentally altering its present character. Any change in its circumstances would have a significant effect on the receptor's heritage or townscape value. This sensitivity is typical for Listed Buildings with Grade I and II* and their settings, Scheduled Monuments, registered Historic Parks and Gardens Grade I and II* and their settings. Always World Heritage Sites.

### Impact Magnitude Criteria

2.42 It should be noted that the various policies and guidance relating to the historic built environment do not provide a definitive system of measurement of impacts upon heritage assets. The matter of the impact magnitude upon built heritage assets is generally one of interpretation and professional judgement.

2.43 In creating the magnitude of impact criteria, the following aspects have been considered:

- Level and extent of impact;
- Extent of visibility in conjunction with the heritage asset;
- Proximity to the heritage asset; and
- Extent of any change of character, function or key elements.

2.44 The magnitude of impact has been classified as low, medium or high, in accordance with the criteria set out in Table 2.3.

Magnitude of Impact	Criteria
Negligible/None	No material change.
Low	A change that only makes a small difference to the ability to understand and appreciate the historic context setting. A minor impact may also be defined as involving assets of low sensitivity exposed to intrusion, obstruction or change of a low to medium magnitudes for short periods of time.
Medium	A change that makes an appreciable difference to the ability to understand the historic context setting. A moderate impact may also be defined as the result of moderately sensitive assets exposed to intrusion, obstruction or change of a medium magnitude, or highly sensitive assets exposed to intrusion or change of a low magnitude.
High	A fundamental change in the appreciation of the resource and historic context or setting. A major impact may also be defined as the result of highly sensitive assets exposed to intrusion, obstruction or change of a high or medium magnitude for prolonged periods.

### Scale of Effect Criteria

2.45 The scale of effects has been assessed on the basis of the value/sensitivity of receptors against the magnitude of impact as presented in Table 2.4.

Magnitude	Sensitivity of Receptors		
	Low	Medium	High
Negligible	None	None-Negligible	Negligible
Low	None – Negligible	Negligible	Minor
Medium	Negligible	Minor	Moderate
High	Minor	Moderate	Major

2.46 In determining the significance of effects, consideration has been given to the type of effect (i.e. direct, indirect or secondary, the geographical extent of the effect and the duration of the effect (i.e. temporary, which is considered to be either short-term (up to five years), medium-term (5-10 years) or permanent (10 years or more)).

2.47 Based on professional judgement, moderate and major effects are considered significant in EIA terms.

### Nature of Effect

2.48 The nature of the effect has been described as either adverse, neutral or beneficial as follows:

- Beneficial – An advantageous effect to a receptor;
- Neutral – An effect that on balance, is equally beneficial and adverse to a receptor; or
- Adverse – A detrimental effect to a receptor.

2.49 Effects that are classified as moderate or major adverse / beneficial / neutral are significant effects. Those that are classified as negligible or minor adverse / beneficial / neutral are not significant.

## Assumptions and Limitations

### Demolition and Construction Stage

- 2.50 It has been assumed that during the demolition and construction stage, appropriate measures to mitigate the effect of related activities (such as noise, dust and the visual effect of construction operations) would be implemented by means of a Construction Environmental Management Plan (CEMP) and conditions applied to the planning permission, in line with ES Chapter 5: Demolition and Construction Environmental Management of ES Volume 1.

### Completed Development Stage

- 2.51 The assessment of the potential impacts and likely effects on heritage assets has been based on the 'worst-case' height and massing and, in the absence of detailed information, commitments in respect of building materiality, articulation, and landscaping.

### Cumulative Stage

- 2.52 It has been assumed that the proposed development and cumulative developments identified would be implemented as per the design as it is proposed in relevant publicly available planning application documents and that these will occur within a similar timeframe to the proposed development.

## Baseline Conditions

### Existing Baseline

- 2.53 Detailed area history, conservation context and heritage significance of identified heritage assets is provided in Appendix 2.1: Historic Environment Assessment of this Volume. The baseline conditions described are as of June 2020.

### Site

- 2.54 The 5.45ha site encompasses the existing two storey Tesco Extra store. It comprises a total of circa 11,582 m<sup>2</sup> GIA of retail floorspace, associated car parking (625 spaces), a petrol filling station and a rectangular shaped open space, located in the north of the site, known as the 'Water Gardens'.
- 2.55 The site lies to the north of Syon Lane, with MacFarlane Way and Grant Way providing the western and eastern boundaries respectively. The Sky Campus is adjacent to the site to the north and Osterley Park partially borders the site to the west.
- 2.56 The site is 800 metres from the small neighbourhood centre at 1-9A Spur Road and 142-156 London Road. The site is also 1000 metres from Brentford Town Centre and over 2km from Hounslow Town Centre.
- 2.57 The site does not contain any designated or undesignated heritage assets. A small section of site on the north western side of MacFarlane Lane is within the Osterley Park Conservation Area (CA13) which was extended in January 2020 to encompass the sports grounds and residential areas to the north and west of the site (the extension is shown in paler green on the map at fig. 2.1).

### Study Area

- 2.58 The heritage assets in the study area exist in a highly heterogenous 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 20<sup>th</sup> century included the building of various of the listed buildings as presented in Table 2.6. The historic character of the immediate area around the site has been created by a series of commercial Art Deco buildings, built in a short period between approximately 1920-1940 and without any overarching urban design or context. Those which are listed have clear special architectural or historic interest deriving from their architectural style, form

the architects who designed them (notably Banister Fletcher and Wallis, Gilbert and Partners) and their original uses. They are very much 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.

- 2.59 The surrounding townscape is characterised by set-piece inter-war period housing whose planned streets of a homogeneous design were developed contemporaneously with the A4 road – the catalyst for this ribbon of suburban expansion.
- 2.60 As well as lying partially within the Osterley Park Conservation Area (CA13) The site lies within a ring of Conservation Areas which are all within the approximate 1 km study area. The closest is Osterley Park (CA13) which is located immediately north-west of the site along MacFarlane Lane, and a small section of the site is situated within this. These are: Isleworth Riverside (CA 11) approximately 800 m to the south-east; Grand Union Canal and Boston Manor (CA 22) approximately 700 m to the north-east; and Spring Grove (CA 24) approximately 500 m to the south-west (see Figure 2.1).

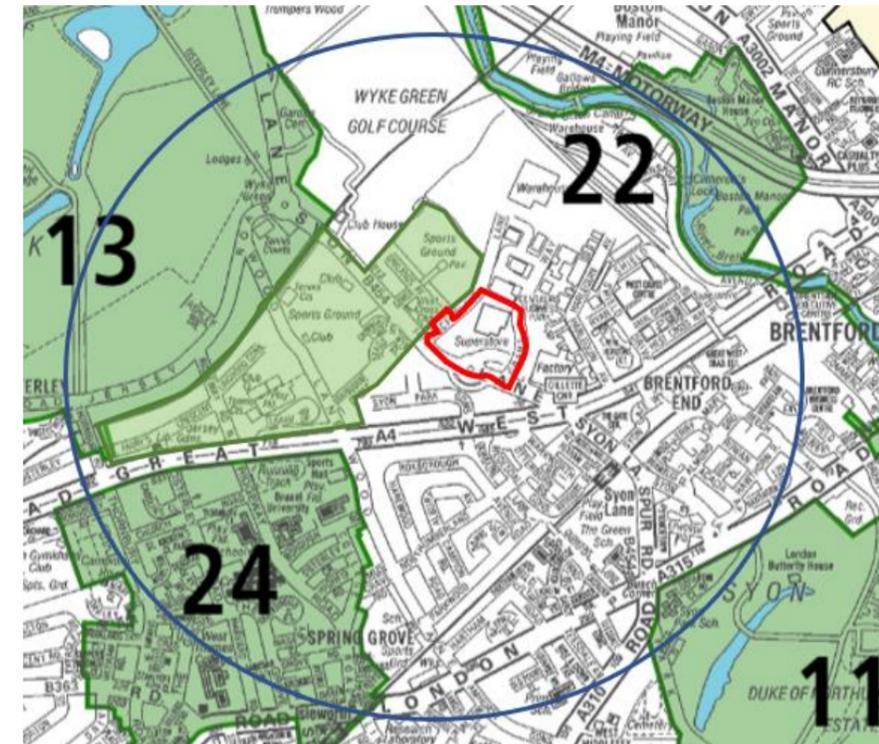


Figure 2.1: Conservation Areas within 1 km of Site

- 2.61 Syon Park and House and Osterley Park and House are two significant former country estates exhibiting the familiar elements of the overarching typology of the country house – a grand 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 20<sup>th</sup> century transport infrastructure.
- 2.62 Further afield, the most significant heritage assets in the wider context of the site comprise the Kew World Heritage Site (WHS) and its registered landscape, as well as specific highly graded listed buildings such as Boston Manor House (Grade I) and Quaker Meeting House, Quakers Lane and Syon Lodge, London Road, both Grade II\*. There are a number of Grade II listed buildings in the broader area surrounding the site, with a more robust sensitivity to change. The nearest, the Gillette Building is adjacent to the site.

- 2.63 Figure 2.2 illustrates the relative position of listed assets in relation to the site (outlined in red), and within a 1 km radius. Listed buildings are shown as blue triangles, 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)

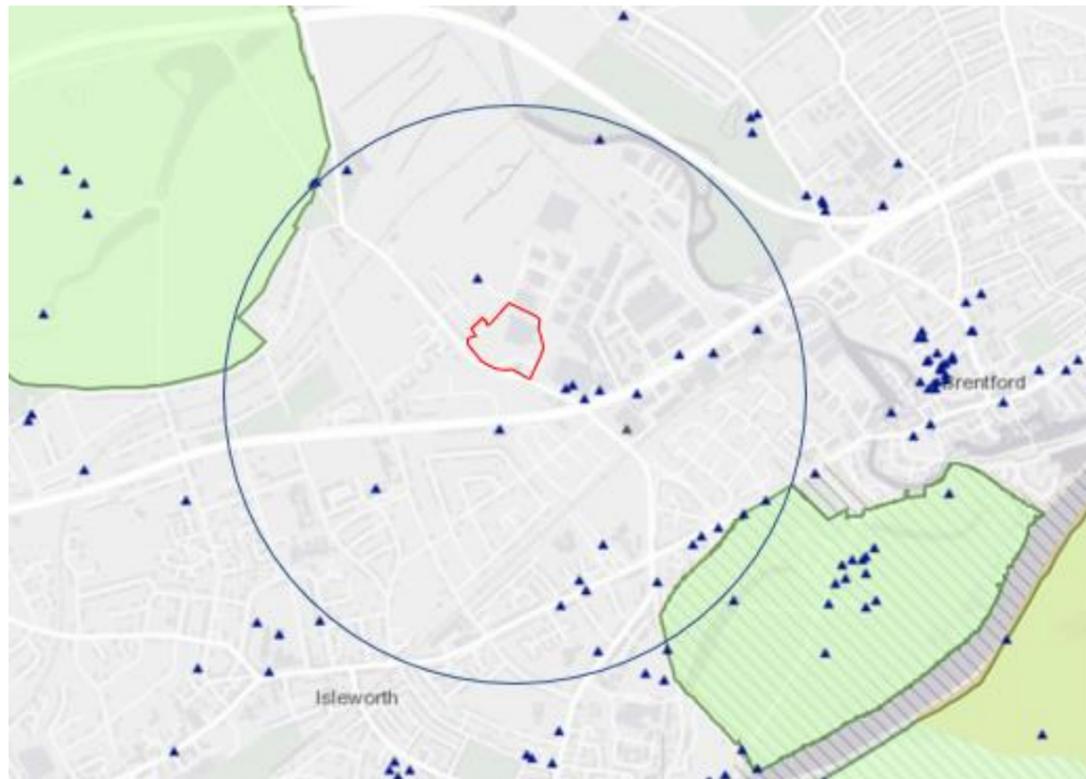


Figure 2.2: Existing Built Heritage Features within 1 km of Site

## Sensitive Receptors

### World Heritage Site

#### Royal Botanic Gardens, Kew

- 2.64 The UNESCO WHS of The Royal Botanic Gardens, Kew is located approximately 1.75 km to the south-east of the site. The Isleworth Riverside Conservation Area (CA11) partially contains the buffer zone of the WHS which extends to include Syon Park.

- 2.65 The Draft Statement of Outstanding Universal Value<sup>22</sup> describes Kew as follows:

*"...set among a series of parks and estates along the River Thames' south-western reaches. Landscape design, buildings and plant collections combine to form a unique testimony to developments in garden art and botanical science that were subsequently diffused around the world. The boundary of the property contains the elements that bear witness to the history of the development of the landscape gardens and Kew Gardens' uninterrupted role as national botanic garden and centre of plant research."*

- 2.66 The buffer zone contains the focus of one of the garden vistas on the opposite bank of the Thames – Syon Park House – together with other parts of the adjacent cultural landscape (Old Deer Park, Kew

Green, Syon Park and housing to the east). Development outside this Buffer Zone may threaten the setting of the property.

- 2.67 The buildings on the site are not currently visible from within the buffer zone and the site is not within a significant view sightline from Kew as defined in the Great West Corridor Local Plan Review.

## Conservation Areas

### Isleworth Riverside (CA 11)

- 2.68 The Isleworth Riverside Conservation Area<sup>23</sup> lies to the south of the site and was designated in 1972. It contains a high number of Listed Buildings, principally the Grade I listed Syon House and Syon Park and their attendant features. Syon Park is also an Archaeological Priority Area. Its southern boundary is the River Thames foreshore. The Conservation Area is located directly across the river from Richmond Old Deer Park the Royal Botanical Gardens, Kew and lies partially in the buffer zone of the Royal Botanical Gardens WHS.

- 2.69 There are at least four character areas within the Conservation Area – with the emphasis on the picturesque: Syon House and parkland; the old riverside settlement which includes the riverside working, urban and residential areas; the village commercial core; and the peripheral grand estates.

### Osterley Park Conservation Area (CA 13)

- 2.70 The Osterley Park Conservation Area<sup>24</sup> lies to the north-west of the site and a small portion of the site lies within this. It was designated in 1988 and extended in 2020<sup>25</sup> to encompass the sports grounds and residential areas to the south-east of its original boundary, as well as an area of parkland to its north. The conservation area is an extensive one, comprising for the most part Osterley Park itself, late 19<sup>th</sup> century railway-related development and some 20<sup>th</sup> century interwar development. The conservation area's primary special architectural and historic interest derives from Osterley House, its landscaped grounds and rural setting. Houses surrounding the perimeter of the park and to the south across the railway line are also important to the conservation area because they reflect the suburban character of their time built around the railway and later the Great West Road, and their integrity of roofs and architectural features, and quality of materials and design form the setting of the park. Some are older (in terraced form) relating to the earlier railway station and commercial neighbours. There are also relic farm settlement buildings and plot forms. The part of the conservation area into which the site extends into has been designated a Character Area 5. It comprises of an estate of late interwar and early post-war two storey semi-detached houses with some short terraces on and off Syon Lane. To the rear of this estate is a recreation ground containing a Grade II listed moderne-style pavilion and clubhouse. This character area and indeed all of the new extension to the southeast offer a marked contrast in form to the open character of the 18<sup>th</sup> century landscape park and pleasure grounds of Osterley representing the first iteration of the concerted suburban expansion of the interwar period and could be seen to act as a transitional or buffer zone between the refined atmosphere of Osterley Park and its House and the busier, commercial tone of the Great West Road.

### Grand Union Canal and Boston Manor Conservation Area (CA 22)

- 2.71 The Grand Union Canal & Boston Manor Conservation Area<sup>26</sup> lies north-east of the site and was designated in July 2001. Within the Conservation Area are a number of Listed Buildings including the Grade I listed Boston Manor House and an Architectural Priority Area, centred on the route of the old Roman road.

- 2.72 The Conservation Area can be considered in two parts: the quasi-rural part north of the Great West Road and the more urban and post-industrial part south of the Great West Road. The common link between the two parts is the combined canal and River Brent which comprises seven distinct character areas. The Grade I listed Boston Manor House, is a fine Jacobean house, set back from Boston Manor Road and

<sup>22</sup> UNESCO, 2003. *Royal Botanic Gardens Kew, Statement of Outstanding Universal Value* [online]. Available at: <https://whc.unesco.org/en/list/1084>

<sup>23</sup> London Borough of Hounslow, 2018. *Isleworth Riverside Conservation Area Appraisal, consultation draft, November 2018*. London. Hounslow Council.

<sup>24</sup> London Borough of Hounslow, 2019. *Osterley Park Conservation Area Appraisal, November 2019*. London. Hounslow Council.

<sup>25</sup> The Gazette, notice ID 3481996, 30 January 2020.

<sup>26</sup> London Borough of Hounslow, 2018. *Grand Union Canal & Boston Manor Conservation Area Appraisal, April 2018*. London. Hounslow Council.

situated in public parkland; both are owned by LBH. The character and quality of the Conservation Area is greatly enhanced by its rich variety and extent of waterways and green open spaces, which create dynamic views in many places.

### Spring Grove (CA 24)

2.73 The Spring Grove Conservation Area<sup>27</sup> is lies south west of the site and was designated in 2001. The special interest of Spring Grove derives from an estate planned to be a grand Victorian suburb. Although having experienced alteration over the years, the original planning intent of the Davies estate remains with tall classical-style villas standing in spacious gardens. The grandiose Italianate stuccoed mansion of Campion House, the characteristic Gothic structure of Lancaster House, and more subtle Arts and Crafts styled semi-detached properties, contributed additional interest.

### Listed Buildings

2.74 The National Heritage List for England (NHLE) is the official register of all nationally protected historic buildings and sites in England, including Listed Buildings, Scheduled Monuments, Protected Wrecks, Registered Parks and Gardens, and Battlefields. Grade I buildings are of exceptional interest, only 2.5 % of all listed buildings are Grade I. Grade II\* buildings are particularly important buildings of more than special interest; totalling 5.8 % of listed buildings are Grade II\*. Grade II buildings are of special interest; totalling 91.7 % of all listed buildings are in this class.

2.75 A search of the NHLE found more than 40 individual or group of Listed Buildings within the search area. These have been grouped for ease of reference and are listed in Table 2.5. The following sections outline the main points of significance of the Grade I and II\* buildings. The 21 Grade II buildings (or groups of buildings) are listed in Table 2.5 and their key points of interest are described.

### Syon House and Syon Park Entrance Lodges and Gates

2.76 Syon House is located approximately 1.4 km south-east of the site and is situated in Syon Park. The House and its Gatehouse ('Lion Gate') and Entrance Lodges form a Grade I group. Syon House was founded by the Duke of Somerset who was granted the holdings of a dissolved monastery in 1547 when the original house was erected. In 1762, Robert Adam remodelled the Tudor House inside and out. It is still held by the Dukes of Northumberland. The grounds are home to a collection of out-buildings and ornamental features. Of these, the Conservatory, The Pavilion and 'Flora's Column' are Grade I listed. Flora's column and The Pavilion (formerly Syon Park Boathouse) are both late 18th century in origin. The Conservatory, c.1830 has a cast iron frame and is described as being "...the first metallic horticultural structure of any importance". The remainder of Syon's associated buildings comprise of a Porter's Lodge, Dairy, Stables, Former Riding School, Gateways, Garden Walls and decorative artefacts within the park, including the lake bridge, all of which are Grade II listed.

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

- It is an example of the country house typology and of a medieval structure adapted to become a country house in the 18<sup>th</sup> 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; and
- The built structures sit in a designed landscape, partially associated with Lancelot Brown but containing various other phases of development.

### Osterley House

2.78 Osterley House is located approximately 1.6 km to the north-west of the site boundary and is set within Osterley Park. The House and its Stables, Aviary and Temple are of high architectural interest and area

each separately listed at Grade I. The grounds are home to a collection of out-buildings and ornamental features which are listed Grade II\* and II.

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

- Osterley House is an example of the country house typology where an essentially 18<sup>th</sup> century house was adapted from an earlier structure. It shares the same architect with Syon House (Robert Adam). It is of very high internal and external architectural interest for these reasons and is enhanced by the following:
- 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, though, unlike Syon House, it is not associated with a noted designer but, like Syon contains various other phases of development.

### Boston Manor

2.80 Boston Manor House lies approximately 960 m north-east of the site and is set within Boston Manor Park. It is listed Grade I. This House is in the ownership of the LBH. The house is a fine Jacobean manor house completed in 1623, with later additions. Its heritage significance can be described as encompassing its high architectural interest which is enhanced by a high quality interior, including a fine plasterwork and carved main staircase which includes elements designed by the 17<sup>th</sup> century Dutch artist Mare Gheercerts.

### Osterley Park 'Roman' Bridge

2.81 Located within Osterley Park, this Grade II\* bridge was designed by noted architect Robert Adam in approximately 1780. It is a rusticated stone-faced bridge of one segmental arch of an interesting design in the manner of Piranesi and an early neo-classical monument.

### Quaker Meeting House

2.82 A simple rectangular building in brown brick built 1785, it lies approximately 660 m south-east of the site. The front of building was heavily damaged by enemy action during the Second World War. It was later restored and has two modern additions to front and rear at left side.

2.83 The house has been in continuous use for its original purpose. It has associations with the Royal Botanic Gardens Kew though several members of its past congregation who were botanists.

### Syon Lodge, London Road

2.84 A fine example of a late 18<sup>th</sup> century 2-storey house in gated grounds with fine classical detailing and literary associations. It is located approximately 850 m south-east of the site.

### Registered Parks and Gardens

#### The Royal Botanic Gardens Kew

2.85 As described above, the Royal Botanic Gardens Kew - which lie approximately 1.75 km to the south-east of the site - are inscribed as a WHS. The grounds are also listed by Historic England, under the category Parks and Gardens, at Grade I.

### Syon Park

2.86 The Grade I listed Syon Park comprises 17<sup>th</sup> century formal terraced gardens which were landscaped in the mid-18<sup>th</sup> century by Lancelot 'Capability' Brown. Extensive development of the grounds continued in the later 19<sup>th</sup> and mid-20<sup>th</sup> centuries. The approximately 80 ha site is bounded to the north and west by London Road and Park Road along which run enclosing brick walls which date from the 17-19<sup>th</sup> centuries

<sup>27</sup> London Borough of Hounslow, 2019. Spring Grove Conservation Area Appraisal, October 2019. London. Hounslow Council.

(Grade II). The River Thames provides the eastern boundary towards which the largely level site gently slopes. At its nearest point it is located approximately 900 m from the site.

## Osterley Park

2.87 Osterley Park is an 18<sup>th</sup> century landscape park and pleasure grounds laid out on the site of an earlier formal garden, with substantial additional tree planting being undertaken in the 19<sup>th</sup> and 20<sup>th</sup> centuries. The 18<sup>th</sup> century landscaping is attributed to Mrs Robert Child, sister-in-law of Robert Adam's client Sir Francis Child, and her steward, Mr Bunce. It is approached from Jersey Road to the south and the entrance, guarded by a late 19<sup>th</sup> century lodge leads onto the tree-lined South Avenue, leading eventually to Osterley House itself. The South Avenue was constructed in response to the arrival in 1883 of the railway at the Osterley Park and Spring Grove Station, approximately 1 km to the south-west of the mansion. It is listed at Grade II\*. At its nearest point it is located approximately 750 m to the north-west of the site.

## Locally Listed Buildings

2.88 The Hounslow Local List<sup>28</sup> is a list of buildings or sites which not statutorily listed but are considered to be of local significance. Inclusion on the Local List designates an asset a 'non-designated' heritage asset under the NPPF.

## Summary

2.89 The full list of receptors identified within the study area alongside their sensitivity to change (as referenced in the Assessment Methodology section) are summarised in Table 2.5.

Table 2.5: Summary of Sensitive Heritage Receptors	
Receptor	Sensitivity
<b>World Heritage Site</b>	
Royal Botanic Gardens, Kew	High
<b>Conservation Areas</b>	
Isleworth Riverside	Medium
Grand Union Canal & Boston Manor	Medium
Osterley Park	Medium
Spring Grove	Medium
<b>Listed Buildings</b>	
<b>Grade I</b>	
Syon House and Syon Park Entrance Lodges and Gates	Medium
Syon House Conservatory; Pavilion (former Boathouse); and 'Flora's Column' Syon Park	Medium
Osterley House and associated group of GI buildings	Medium
Boston Manor House	Medium
<b>Grade II*</b>	
Osterley Park Roman Bridge	Medium
Quaker Meeting House	Medium
Syon Lodge	Medium

Table 2.5: Summary of Sensitive Heritage Receptors	
Receptor	Sensitivity
<b>Grade II</b>	
Borough Road	
Lancaster House (NHLE: 1379963, Purpose built school of 1870, Stock brick, polychrome brickwork, stone dressings. Three storeys and attics, ten symmetrical bays each side of central entrance bay. Venetian Gothic)	Medium
Boston Manor Road	
Stables of Boston Manor House (NHLE: 1358662; undated; included for group value)	Medium
Garden Wall and Gateway to Boston Manor House (NHLE: 1079604)	Medium
Gallows Bridge (over Brentford Canal), Grand Union Canal (NHLE: 1240575, 1820. Single span iron footbridge probably by Thomas Telford)	Medium
Gower Road	
Pavilion and clubhouse (Gower Road) (NHLE: 1271519; Sports pavilion. 1935 by Brian L. Sutcliffe FRIBA and H. Colin Farmer FRIBA. Reinforced concrete. Tiered spectator stand beneath a cantilever roof, over the ground floor containing a bar with curved Crittall windows, a central refreshment room with five windows looking over the playing field, and associated amenities. Listed for its structural interest and as an example of a private sports pavilion influenced by the Modern Movement)	Medium
Great West Road	
Former Coty factory premises (NHLE: 1270424; 1933 by Wallis, Gilbert and Partners. Moderne. Has particular group value with its listed neighbours, the former Pyrene factory and Curry's Warehouse)	Medium
Former Firestone Factory gates, gate piers & railings (NHLE: 1389664; 1928, Moderne)	Low
Former Gillette building, front block and return wings of main Gillette building (NHLE: 1255219; 1937. Bannister Fletcher. Two storeys and basement with very lofty central clock tower which is a local landmark. Brown brick)	Medium
Former Gillette building, four lamp standards with lanterns outside the main entrance (NHLE: 1067530)	Low
Church of St Francis of Assisi, No. 865 (NHLE: 1260608; 1933-5 by E C Shearman. Claygate stock brick with contrasting stone bands externally and Fletton brick. This powerful composition shows the richness of Gothic design in the 1930s, of which Shearman was one of the best exponents of creating monumental spaces out of simple materials)	Medium
National Westminster Bank, No. 880 (NHLE: 1241144; 1935 by WFC Holden as the Osterley branch of the National Provincial Bank. Single storey, brown brick with Portland stone dressings. Expressionist)	Medium
Westlink House, former Pyrene II Factory, No. 981 (NHLE: 1255218; 1928 by Wallis, Gilbert and Partners. Moderne. Has particular group value with its listed neighbours, the former Coty factory and Curry's Warehouse)	Medium
Former warehouse for Curry's Ltd., No. 991 (NHLE: 1260638; 1935-6 by F E Simpkins. Has particular group value with its listed neighbours, the former Pyrene and Coty factories)	Medium

<sup>28</sup> London Borough of Hounslow, 2019. Hounslow's Local List, September 2019. Online: [www.hounslow.gov.uk/info/20010/planning\\_and\\_building/1098/design\\_and\\_conservation/6](http://www.hounslow.gov.uk/info/20010/planning_and_building/1098/design_and_conservation/6)

Table 2.5: Summary of Sensitive Heritage Receptors	
Receptor	Sensitivity
Jersey Road	
Osterley Park: group of individually listed buildings (Entrance Lodges, Farmhouse, Garden Walls and Gates, Garden ornaments;	Medium
London Road	
No. 280 (grounds of Marlborough School) (NHLE: 1358305; Early C19. Stock brick. 2 storeys. Originally built for the steward of Syon Hill Estate during the ownership of the Duke of Marlborough)	Medium
Coach and Horses Public House (NHLE: 1080313; C18 with later alterations. Stock brick. 2 parallel pitched roofs. 3 storeys. Mentioned by Charles Dickens in "Oliver Twist")	Medium
Park Cottages, Nos. 191-199 (NHLE: 1080314; C18 row of cottages. Brown brick with red dressings. 2 storeys and attics)	Medium
Rose and Crown Inn (NHLE: 1293984; C18 with C19 additions. Brown brick. 3 storeys. Old coaching Inn)	Medium
Park Road	
Syon Park: group of individually listed buildings: Stables, Dairy, Former Riding School, Porters Lodge. Gates & Walls, Garden ornaments)	Medium
K6 telephone kiosk outside Gillette Building (NHLE: 1096906)	Low
Twickenham Road	
Busch House School (NHLE: 1261054; Late C18 stock brick house in grounds. 2 storeys and attic)	Medium
Thanet House (NHLE: 1261055; Early C19 house set back from road. Yellow brick. Central projection 3 storeys)	Medium
<b>Registered Parks and Gardens</b>	
<b>Grade I</b>	
Royal Botanic Gardens, Kew	Medium
Syon Park	Medium
<b>Grade II*</b>	
Osterley Park	Medium
<b>Locally Listed Buildings</b>	
Great West Road	
No. 891 (Small modernist Art Deco commercial building by Wallis, Gilbert and Partners, 1920s-1930s),	Low
No. 764 (Former Osterley Park Hotel. Arts and Crafts)	Low
London Road	
No. 11 (1853, Northumberland Arms PH)	Low
Quakers Lane	

Table 2.5: Summary of Sensitive Heritage Receptors	
Receptor	Sensitivity
Angel House walls (Originally the front boundary walls to the Quaker Meeting House. Faint inscriptions read MEETING and HOUSE)	Low
Green School for Girls (1906. School buildings in the old English style, provided by the Seventh Duke of Northumberland. An early local example of a secondary school organised under the 1902 Education Act)	Low
Park Road	
Isleworth Cemetery Lodge (Former entrance lodge to Park Road cemetery which, along with twin gothic chapels, a mortuary, walls, entrance gates with piers, railings erected c.1880.)	Low
Isleworth Cemetery Mortuary (as above, 1880)	Low
Syon Lane	
Wyke Farm Barn (Early 19th century formerly part of the now demolished Wyke House farm)	Low

## Assessment of Effects

### General

- 2.90 This chapter presents the findings of the assessment of the likely effects of the proposed development. The nature and likelihood of the effects of the proposed development on heritage assets has been assessed in both the long- and short-term, against clearly defined criteria.
- 2.91 Significance has been assigned to each receptor relative to heritage significance, its sensitivity to change and the magnitude of impact in accordance with best practice.
- 2.92 It is widely recognised that the heritage significance of an asset is not the same as its sensitivity to changes to its setting. The Setting of Heritage Assets (Historic England 2017, p. 9<sup>29</sup>). states: "...the setting of a heritage asset is the surroundings in which a heritage asset is experienced. 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". Thus, in determining effects upon the setting of assets by the proposed development, both importance and sensitivity to changes to setting have been considered. Factors considered when assessing sensitivity to change include, but are not limited to, heritage significance, condition, type and period of asset and landscape positioning.

### Demolition and Construction Effects

- 2.93 The setting of heritage assets, the character and appearance of nearby Conservation Areas and townscape quality generally would be affected to varying degrees by the demolition and construction stage works. These would have the potential impact of reducing temporarily the degree to which heritage and townscape character in the vicinity of the site can be appreciated, but that character would not be permanently harmed. The effects would be medium term (5-10 years) and indirect and vary considerably depending on the distance from the site and the sensitivity of the asset to change.
- 2.94 Visual impacts would include the presence of tower cranes in views from the surrounding areas and the hoarding of the perimeter of the site in the conventional manner for construction sites. Other constructional indirect short-term effects on built heritage assets include noise, dust and vibration,

<sup>29</sup> Historic England, 2017. The Setting of Heritage Assets: Historic Environment, Good Practice Advice in Planning Note 3.

movement of heavy plant and materials to and from the site; erection of construction infrastructure (e.g. scaffolding, fixed tower cranes, mobile cranes, hoarding), and site lighting.

- 2.95 The majority of the identified designated heritage assets would not be affected during the demolition and construction stage due to their distance from the site and the intervening built townscape form.
- 2.96 The receptors that would be most affected would be those clustered nearest to the site and the effects would be as presented in Table 2.6. Taking into account the embedded mitigation measures that would be adopted as part of the CEMP, the overall effect of the demolition and construction stage works on these receptors would be medium term, temporary, indirect, **Minor-Adverse**.

Receptor	Sensitivity	Impact Magnitude	Scale of Effect	Nature of Effect
Osterley Park Conservation Area	Medium	Medium	Minor	Adverse
Pavilion and clubhouse, Gower Road	Medium	Medium	Minor	Adverse
Former Gillette Building, Great West Road	Medium	Medium	Minor	Adverse
NatWest Bank Great West Road	Medium	Medium	Minor	Adverse

- 2.97 As a function of distance and sightlines, the effects on all other receptors would be medium term, temporary, indirect **Negligible Neutral**.

## Completed Development Effects

- 2.98 The proposed development would replace the current single-level retail warehouse structure of no particular architectural merit, that makes poor use of its site, and its associated ground level car park and service routes. It would provide new uses that are appropriate for the site and for the area, delivering dramatic enhancements to the public realm and much needed new homes.
- 2.99 The design of the proposed development, discussed with LBH and the Greater London Authority (GLA) (refer to ES Chapter 3: Alternatives and Design Evolution in Volume 1), breaks down the overall volume of accommodation in a way that responds to the circumstances of the site and the sensitivity of its surroundings. The tallest part of the development is positioned towards the eastern side of the site and steps down towards the Gillette Building, Syon Lane and the Osterley Park Conservation Area – the areas that are most sensitive in heritage and townscape terms. This also ensure that the tower of the Former Gillette Factory is retained as a landmark within local views.
- 2.100 The proposed development, due to its scale and density would change the setting of some heritage assets and the townscape character of the surroundings of the site by virtue of its visibility and presence. That visibility is not, by itself, harmful. 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, which will be the case for the proposed development. The full views assessment exercise is contained in Chapter 2: Townscape and Visual Impact Assessment of this Volume.
- 2.101 Heritage assets identified in the existing baseline would be subject to a range of permanent, indirect impacts, the effect of which would vary considerably depending on the distance from the site and the sensitivity of the asset to change.
- 2.102 The effect of this height and the visibility of the proposed development 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. 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 would not harm that significance. Analysis 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 proposed development would just appear, along with the redevelopment of the Homebase 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. A painting by Canaletto of the view of Syon from the Thames was put forward by HE for review of effects. On examination, the painting was found to have employed 'artistic licence' in its rendering of the view and did not present a realistic relationship of the actual situation. As such it was not appropriate to consider that view in the analysis of effects. The Great Lime Avenue is, logically and experientially, the most important view on the western side of Syon Park. The presence of the proposed development within other views in the park is of inherently less significance, even where it is seen in the backdrop of other listed structures. It important to state clearly that the heritage significance of both Osterley and Syon does not rely on an on empty skyline. As such the effects for each of these receptors are judged to be permanent, indirect, **Minor-Neutral** and the effect would not be significant.

- 2.103 The Former Gillette building, National Westminster Bank (No. 880 GWR) and the Pavilion and Clubhouse on Gower Road would each have direct views of the development and fall into views of it. Although, there is proximity this is not enough to harm what is intrinsic to the setting of each asset. Both the Gillette building and the NatWest Bank were designed to sit within an urban light-industrial landscape of hard surfaces, traffic and competing architectural expression. These are robust receptors, of medium sensitivity when it comes to absorbing change, and therefore change in their setting which introduces a 21st century land use into the surrounding environment is not enough of a change to diminish their architectural or historical significance. The Pavilion and Clubhouse remains surrounded by its playing fields context which is an important part of its setting and which would not be diminished by tall buildings in the view. Similarly, although the wider setting of the Osterley Park Conservation Area southern extension would experience some visual change by virtue of its proximity to the development, this would not be enough to damage its special interest overall which is derived from its largely intact streets of inter-war housing. As such the effects for each of these receptors are judged to be permanent, indirect, **Minor-Neutral** and the effect would not be significant.
- 2.104 The remaining heritage assets in Table 2.7 are either far enough away or would not have a direct view of the development and/or the development would not be visible in views of these assets, so the effect for those would be permanent, indirect and range between **None-Neutral** to **Negligible-Neutral**.
- 2.105 The likely significance of any impact that the proposed development may have on built heritage assets is a function of the sensitivity of the asset (see Table 2.2) and the magnitude of the change resulting from the proposed development (see Table 2.3) which is arrived at by referencing Table 2.4. The specific effect upon each receptor is tabulated in Table 2.7.

Receptor	Sensitivity	Impact Magnitude	Scale of Effect	Nature of Effect
<b>World Heritage Site</b>				
Royal Botanic Gardens, Kew	High	Negligible	Negligible	Neutral
<b>Conservation Area</b>				
Isleworth Riverside	Medium	Low	Negligible	Neutral
Grand Union Canal & Boston Manor	Medium	Low	Negligible	Neutral
Osterley Park	Medium	Medium	Minor	Neutral
Spring Grove	Medium	Low	Negligible	Neutral
<b>Listed Building</b>				

Table 2.7: Summary Completed Development Effects				
Receptor	Sensitivity	Impact Magnitude	Scale of Effect	Nature of Effect
Grade I				
Syon House and Syon Park Entrance Lodges and Gates	Medium	Medium	Minor	Neutral
Syon House Conservatory; Pavilion (former Boathouse); and 'Flora's Column' Syon Park	Medium	Medium	Minor	Neutral
Osterley House and associated group of GI buildings	Medium	Medium	Minor	Neutral
Boston Manor House	Medium	Negligible	None-Negligible	Neutral
Grade II*				
Osterley Park Roman Bridge	Medium	Negligible	None-Negligible	Neutral
Quaker Meeting House	Medium	Negligible	None-Negligible	Neutral
Syon Lodge	Medium	Negligible	None-Negligible	Neutral
Grade II				
Borough Road				
Lancaster House	Medium	Negligible	None-Negligible	Neutral
Boston Manor Road				
Stables of Boston Manor House	Medium	Negligible	None-Negligible	Neutral
Garden Wall and Gateway to Boston Manor House	Medium	Negligible	None-Negligible	Neutral
Gallows Bridge (over Brentford Canal), Grand Union Canal	Medium	Negligible	None-Negligible	Neutral
Gower Road				
Pavilion and clubhouse (Gower Road)	Medium	Medium	Minor	Neutral
Great West Road				
Former Coty factory premises	Medium	Negligible	None-Negligible	Neutral
Former Firestone Factory gates, gate piers and railings	Low	Negligible	None	Neutral
Former Gillette building: front block and return wings of main Gillette building	Medium	Medium	Minor	Neutral

Table 2.7: Summary Completed Development Effects				
Receptor	Sensitivity	Impact Magnitude	Scale of Effect	Nature of Effect
Former Gillette building: four lamp standards with lanterns outside the main entrance	Low	Negligible	None	Neutral
Church of St Francis of Assisi, No. 865	Medium	Negligible	None-Negligible	Neutral
National Westminster Bank, No. 880	Medium	Medium	Minor	Neutral
Westlink House, former Pyrene II Factory, No. 981	Medium	Negligible	None-Negligible	Neutral
Former warehouse for Curry's Ltd., No. 991	Medium	Negligible	None-Negligible	Neutral
Jersey Road				
Osterley Park: group of individually listed buildings	Medium	Negligible	None-Negligible	Neutral
London Road				
No. 280 (grounds of Marlborough School)	Medium	Negligible	None-Negligible	Neutral
Coach and Horses Public House	Medium	Negligible	None-Negligible	Neutral
Park Cottages, Nos. 191-199	Medium	Negligible	None-Negligible	Neutral
Rose and Crown Inn	Medium	Negligible	None-Negligible	Neutral
Park Road				
Syon Park: group of individually listed buildings	Medium	Negligible	None-Negligible	Neutral
K6 telephone kiosk outside Gillette Building	Low	Negligible	None	Neutral
Twickenham Road				
Busch House School	Medium	Negligible	None-Negligible	Neutral
Thanet House	Medium	Negligible	None-Negligible	Neutral
<b>Registered Park and Garden</b>				
Grade I				
Royal Botanic Gardens, Kew	Medium	Negligible	None-Negligible	Neutral
Syon Park	Medium	Negligible	None-Negligible	Neutral
Grade II*				

Receptor	Sensitivity	Impact Magnitude	Scale of Effect	Nature of Effect
Osterley Park	Medium	Negligible	None-Negligible	Neutral
<b>Locally Listed Building</b>				
Great West Road				
No. 891	Low	Negligible	None	Neutral
No. 764	Low	Negligible	None	Neutral
London Road				
No. 11	Low	Negligible	None	Neutral
Quakers Lane				
Angel House walls	Low	Negligible	None	Neutral
Green School for Girls	Low	Negligible	None	Neutral
Park Road				
Isleworth Cemetery Lodge	Low	Negligible	None	Neutral
Isleworth Cemetery Mortuary	Low	Negligible	None	Neutral
Syon Lane				
Wyke Farm Barn	Low	Negligible	None	Neutral

## Assessment of Residual Effects

### Additional Mitigation

#### Demolition and Construction Stage

2.106 The effect of demolition and construction stage works on perception and experience of heritage and townscape significance would be reduced by the implementation of an effective CEMP by the appointed contractor. The CEMP would introduce measures to mitigate the adverse impacts from such activities associated with (e.g.) noise, dust, vibrations, site traffic and visual change. No additional mitigation is proposed.

#### Completed Development Stage

2.107 No mitigation is considered necessary during the completed development stage as it is built into the design process. The design of the proposed development has been refined through pre-application discussions with the LBH and the GLA. Control of the detailed design under the reserved matters process, ensures steps to mitigate the effects of the visibility of the buildings. Accordingly, the residual effects of the completed development on the significance of the heritage assets remain unchanged from those previously identified in the absence of mitigation measures. No additional mitigation is proposed.

### Enhancement Measures

2.108 No enhancement measures are proposed in respect of built heritage.

## Demolition and Construction Residual Effects

2.109 As no additional mitigation would be required, the residual demolition and construction effects remain as reported in the assessment of effects section:

- Temporary (medium-term);
- Indirect; and
- **Negligible-Neutral** and **Minor-Adverse**.

## Completed Development Residual Effects

2.110 As no additional mitigation would be required, the residual completed development effects remain as reported in the assessment of effects section:

- Permanent (long-term);
- Indirect; and
- **Negligible-Neutral** to **Minor-Neutral**.

## Summary of Residual Effects

2.111 Table 2.8 provides a tabulated summary of the outcomes of the Built Heritage assessment of the proposed development.

Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+	D	P	R	St Mt Lt
<b>Demolition and Construction Stage</b>								
<b>Conservation Areas</b>								
Osterley Park Conservation Area	Introduction of activities associated with construction and demolition. The resulting visual and aural disruption to the setting of the receptors may affect the ability to appreciate the heritage significance as embodied in the historic context or townscape setting.	None required	Minor (not significant)	-	I	T	R	Mt
<b>Listed Buildings</b>								
Pavilion and Clubhouse, Gower Road	Introduction of activities associated with construction	None required	Minor (not significant)	-	I	T	R	Mt

Table 2.8: Summary of Residual Effects								
Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+	D	P	R	St Mt Lt
Former Gillette Building, Great West Road	and demolition. The resulting visual and aural disruption to the setting of the receptors may affect the ability to appreciate the heritage significance as embodied in the historic context or townscape setting.		Minor (not significant)	-	I	T	R	Mt
All remaining receptors	Introduction of activities associated with construction and demolition. The resulting visual and aural disruption to the setting of the receptors may affect the ability to appreciate the heritage significance as embodied in the historic context or townscape setting.	None required	Negligible (not significant)	+/-	I	T	R	Mt
<b>Completed Development Stage</b>								
<b>World Heritage Site</b>								
Royal Botanic Gardens, Kew	Introduction of new built form within setting of a heritage asset resulting in visual alteration affecting the ability to appreciate the heritage significance as embodied in the historic context or townscape setting.	None required	Negligible (not significant)	+/-	I	P	IR	Lt
<b>Conservation Areas</b>								
Isleworth Riverside	Introduction of new built form within setting of a heritage asset resulting in visual alteration affecting the ability	None required	Negligible (not significant)	+/-	I	P	IR	Lt
Grand Union Canal & Boston Manor	Introduction of new built form within setting of a heritage asset resulting in visual alteration affecting the ability		Negligible (not significant)	+/-	I	P	IR	Lt

Table 2.8: Summary of Residual Effects								
Receptor	Description of Residual Effect	Additional Mitigation	Scale and Significance of Residual Effect **	Nature of Residual Effect*				
				+	D	P	R	St Mt Lt
Osterley Park	to appreciate the heritage significance as embodied in the historic context or townscape setting.		Minor (not significant)	+/-	I	P	IR	Lt
Spring Grove			Negligible (not significant)	+/-	I	P	IR	Lt
<b>Listed Buildings</b>								
Osterley House and associated group (Grade I)	Introduction of new built form within setting of a heritage asset resulting in visual alteration affecting the ability to appreciate the heritage significance as embodied in the historic context or townscape setting.	None required	Minor (not significant)	+/-	I	P	IR	Lt
Syon House and Syon Park Entrance Lodges and Gates (Grade I)			Minor (not significant)	+/-	I	P	IR	Lt
Syon House Conservatory; Pavilion (former Boathouse); and 'Flora's Column' Syon Park (Grade I)			Minor (not significant)	+/-	I	P	IR	Lt
Boston Manor House (Grade I)			Negligible (not significant)	+/-	I	P	IR	Lt
Osterley Park Roman Bridge (Grade II*)			None-Negligible (not significant)	N/A +/-	I	P	IR	Lt
Quaker Meeting House (Grade II*)			None-Negligible (not significant)	N/A +/-	I	P	IR	Lt
Syon Lodge (Grade II*)			None-Negligible (not significant)	N/A +/-	I	P	IR	Lt
Borough Road (all)			None-Negligible (not significant)	N/A +/-	I	P	IR	Lt

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
Boston Manor Road (all)			None-Negligible (not significant)	N/A +/-	I	P	IR	Lt
Gower Road - Pavilion and clubhouse			Minor (not significant)	+/-	I	P	IR	Lt
Great West Road (all save the below)			None to None-Negligible (not significant)	N/A +/-	I	P	IR	Lt
Former Gillette building, front block and return wings of main Gillette building (GWR)			Minor (not significant)	+/-	I	P	IR	Lt
National Westminster Bank, No. 880 Great West Road			Minor (not significant)	+/-	I	P	IR	Lt
Jersey Road (all)			None-Negligible (not significant)	N/A +/-	I	P	IR	Lt
London Road (all)			None-Negligible (not significant)	N/A +/-	I	P	IR	Lt
Park Road (all)			None to None-Negligible (not significant)	N/A +/-	I	P	IR	Lt
Twickenham Road (all)			None-Negligible (not significant)	N/A +/-	I	P	IR	Lt
<b>Registered Park and Garden</b>								
Royal Botanic Gardens, Kew (GI)	Introduction of new built form within setting of a heritage	None required	None-Negligible	N/A +/-	I	P	IR	Lt

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
	asset resulting in visual alteration affecting the ability to appreciate the heritage significance as embodied in the historic context or townscape setting.		(not significant)					
Syon Park (GI)			Negligible (not significant)	+/-	I	P	IR	Lt
Osterley Park (GII*)			Minor (not significant)	+/-	I	P	IR	Lt
<b>Locally Listed Building</b>								
All locally listed buildings	Introduction of new built form within setting of a heritage asset resulting in visual alteration affecting the ability to appreciate the heritage significance as embodied in the historic context or townscape setting.	None required	None (not significant)	N/A	I	P	IR	Lt
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

### Intra-Project Effects

2.112 As explained in ES Chapter 2: EIA Process and Methodology (Volume 1), intra-project cumulative effects are discussed in ES Chapter 12: Cumulative Effects of ES Volume 1.

### Inter-Project Effects

2.113 This section considers the proposed development in combination with other committed developments and any significant cumulative effects that could occur.

2.114 Table 2.9 provides a summary of the likely cumulative effects resulting from the proposed development and the cumulative developments.

Cumulative Development	Demolition and Construction		Completed Development	
	Cumulative Effects Likely?	Reason	Cumulative Effects Likely?	Reason
New Horizons Court, Ryan Drive, Brentford, TW8 9EP (Ref: 02912/A/PA2, APP/F5540/W/16/3165799)	Yes	If demolition and construction phases overlap, effects are considered likely on receptors in and around the Great West Road	No	Scale of development in terms of height or mass is negligible
4 and 8 Harlequin Avenue, Brentford, TW8 9EW (Ref: 00558/4-8/P1)	Yes	If demolition and construction phases overlap, effects are considered likely on receptors in and around the Great West Road	No	Scale of development in terms of height or mass is low
1 Commerce Road, Brentford, London, TW8 8LE (Ref: 00297/H/P13)	No	Considered to be too far away from site	No	Considered to be too far away from application site
891 Great West Road, Isleworth London TW7 5PD (Ref: 00505/891/P4)	Yes	If demolition and construction phases overlap, effects are considered likely on receptors in and around the Great West Road	No	Scale of development in terms of height or mass is low
891 Great West Road, Isleworth London TW7 5PD (Ref: 00505/891/P5)	Yes	If demolition and construction phases overlap, effects are considered likely on receptors in and around the Great West Road	No	Scale of development in terms of height or mass is low
Sky, Sites 6 & 7, Grant Way, Isleworth TW7 5QD (Ref: 00558/A/P69)	Yes	If demolition and construction phases overlap, effects are considered likely on receptors in and around the Great West Road	No	Scale of development in terms of height or mass is negligible
Former Syon Gate Service Station, Land at South of Gillette Corner, Great West Road, Isleworth TW7 5NP (00505/AF/P28)	Yes	If demolition and construction phases overlap, effects are considered likely on receptors in and around the Great West Road	No	Scale of development in terms of height or mass is low

Cumulative Development	Demolition and Construction		Completed Development	
	Cumulative Effects Likely?	Reason	Cumulative Effects Likely?	Reason
Bolder Academy, 1 MacFarlane Lane, Isleworth, TW7 5PN (Ref: 01106/W/P9)	Yes	If demolition and construction phases overlap, effects are considered likely on Pavilion and Clubhouse, Gower Road	No	Scale of development in terms of height or mass is low
Homebase, Syon Lane, Isleworth, TW7 5QE	Yes	If demolition and construction phases overlap, effects are considered likely on receptors in and around the Great West Road	Yes	Scale of development in terms of additional height or mass is high

## Demolition and Construction Cumulative Effects

2.115 Should the cumulative developments be constructed within the same timeframe as the proposed development, it is considered that there would be a cumulative effect from eight of these schemes with the proposed development on the heritage receptors in and around the Great West Road. This is due to the location of these schemes, clustered around the same area of the Great West Road as many of the receptors, is sufficiently close that the likelihood of the interaction of demolition and construction effects is high. These cumulative effects would be no greater than the proposed development in isolation. Therefore, indirect and temporary **Minor-Adverse** and not significant.

## Completed Development Cumulative Effects

2.116 It is not considered that significant cumulative effects would arise to impact on the setting of any heritage receptor during the completed development stage. The much lower height and position of the eight identified schemes is such that the intervening townscape would not allow for any significantly visible cumulative effect.

2.117 In the case of the Homebase Syon Lane scheme, the townscape views in Chapter 2: Townscape and Visual Impact Assessment (of this Volume), show that the relationship between this scheme and the proposed development is such as to permit the proposed development to be seen in certain views from within The Grand Union Canal & Boston Manor Conservation Area. However, in such views the proposed development is seen as distinctly separate from the Homebase Syon Lane scheme with a significant degree of skyline between each.

2.118 Overall, cumulative effects would be

- Permanent (long-term);
- Indirect; and
- **Negligible-Neutral** to **Minor-Neutral**.

## Summary of Assessment Background

2.119 The chapter has detailed the potential above ground built heritage effects due to the demolition and construction stage and completed development stage of the proposed development. The assessment of

construction and completed development stages has been undertaken taking into account the relevant national and local guidance and regulations.

2.120 It has assessed the effect upon designated 'heritage assets', including World Heritage Sites, Listed Buildings, Conservation Areas and Registered Landscapes. Locally Listed Buildings are 'non-designated heritage assets'. The study has identified more than 40 individual or groups of heritage assets within a 1 km study area.

## Demolition and Construction Effects

2.121 The setting of the identified heritage assets and the character and appearance of nearby Conservation Areas and townscape quality generally, would be affected to varying degrees by the demolition and construction stage works. The works would have the potential temporary impact of reducing the degree to which heritage and townscape character within the study area can be appreciated. However, as with the nature of temporary effects, the character would not be permanently affected. The effects would be short-term and indirect and vary considerably depending on the distance from the site and the sensitivity of the asset to change. As is typical of major development in an urban context, a CEMP would be implemented by the contractor during the demolition and construction stage, which would seek to prevent/minimise adverse (e.g.) dust, noise, visual appearances of the works through appropriate mitigation measures.

2.122 Overall, it considered that the demolition of the existing site and construction of the proposed development would result in a temporary and indirect **Negligible-Neutral to Minor-Adverse** effects on the identified heritage assets, and as such would not give rise to significant effects.

## Completed Development Effects

2.123 The proposed development would replace an existing Tesco Extra Store which is of no particular architectural or heritage merit to the area. The proposed development is well-designed and provides new uses that are appropriate for the site and for the area. The design breaks down the overall volume of accommodation in a way that responds to the circumstances of the site and the sensitivity of its surroundings. The tallest part of the proposed development is positioned towards the eastern side of the site and steps down towards the Gillette Building, Syon Lane and the Osterley Park Conservation Area – the areas that are most sensitive in heritage and townscape terms. This also ensures that the tower of the Former Gillette Factory is retained as a landmark within local views.

2.124 The proposed development is of considerable scale and density and would change the setting of heritage assets and the townscape character of the surroundings of the site by virtue of its visibility and presence. That visibility is not, by itself, adverse. 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.

2.125 The design of the proposed development has been carefully undertaken to incorporate embedded mitigation to prevent any adverse effect on nearby and more widely located heritage assets. As such, residual effects on heritage assets would be indirect, permanent **Negligible-Neutral to Minor-Neutral** and not significant.

## Cumulative Effects

2.126 It is not considered that significant cumulative effects would arise on the setting of any heritage receptor during the demolition and construction stage. Should the cumulative schemes be constructed within the same timeframe as the proposed development, it is considered that there would be a cumulative effect from eight of these schemes with the proposed development on the heritage receptors in and around the Great West Road. This is due to the location of these schemes, clustered around the same area of the Great West Road as many of the receptors, is sufficiently close that the likelihood of the interaction of demolition and construction effects is high. These cumulative effects would be no greater than the

proposed development in isolation. Therefore, indirect and temporary **Minor-Adverse** cumulative effects are likely to arise.

2.127 It is not considered that significant cumulative effects would arise on the setting of any heritage receptor during the completed development stage. The much lower height and mass and/or position of each of the cumulative schemes are such that the intervening townscape would not allow for any significantly visible cumulative effect. Therefore, the overall cumulative effects would range between **Negligible-Neutral to Minor-Neutral**.

September 2020

# OSTERLEY PLACE

TESCO OSTERLEY, SYON LANE, TW7 5NZ

## HERITAGE STATEMENT

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Consultant: KMHeritage



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**St Edward**  
Designed for life

Osterley Place  
Tesco Osterley, Syon Lane, Isleworth, TW7 5NZ

Heritage Statement

September 2020

Consultancy for the  
Historic Built Environment **KMHeritage**

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## 1 Introduction

1.1 This report has been prepared to support an outline planning application for a proposed residential led, mixed-use development of the site at the Tesco site, Syon Lane, Isleworth, TW7 5NZ. 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:

*"Outline planning application with all matters reserved except access for the demolition of existing building and car park and erection of buildings to provide residential homes, plus flexible non-residential space comprising commercial, business and service space, and/or learning and non-residential institution space, and/or local community space, and/or public house/drinking establishment, and/or a mobility hub, along with associated access, bus turning, car and cycle parking, and landscaping arrangements"*

1.4 The key elements of the development comprise:

- Up to 1,677 new homes;
- Between 3,000 sqm and 5,000 sqm of flexible non-residential floorspace comprising commercial,

business and service space, and/ or learning and non-residential institution space, and/or local community space, and/or a public house/ drinking establishment, and/or mobility hub;

- Buildings heights ranging from two to 17 storeys;
- A minimum of 20,000 sqm of publicly accessible open space, which includes three new public open spaces;
- A minimum of 8,000 sqm of communal amenity space at podium and roof level;
- A minimum of 5,000 sqm play space split between public ground floor area and communal podium/roof levels;
- Planting of a minimum of 300 new trees;
- Up to 400 car parking spaces, including a minimum of 10 car club bays;
- 20% of car parking spaces to be electric vehicle charging points, with remaining spaces to be passive;
- London Plan compliant cycle parking;
- A new public route through the retained and enhanced Water Gardens;
- A mobility hub and bus welfare facilities; and
- A new bus turning facility for Route E1 and H28 buses.

**Purpose**

- 1.5 The purpose of the report is to assess the proposed development against national and local policies relating to the historic built environment.

- 1.6 This report should be read in conjunction with the parameter plans, design code and development specification prepared by JTP Architects. Further information on the illustrative scheme is provided in the Design & Access Statement.

**Organisation**

- 1.7 This introduction is followed in Section 2, by a description and analysis of the site and its heritage context. Section 3 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 development and its effects is provided in Section 4. Section 5 assesses the proposals against that policy and guidance. Section 6 is a summary and conclusion.

**Author**

- 1.8 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.
- 1.9 Drafting, research and analysis was carried out by Anne Roache MA MSc. Anne has over 25 years' experience working for leading commercial organizations in the fields of property, planning and law, alongside a specialisation in the archaeology, architectural and social history of London.
- 1.10 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 Syon Lane, north of the A4/Great West Road in the London Borough of Hounslow and is occupied by a large Tesco superstore that provides 9,000 m<sup>2</sup> of retail floorspace and 614 associated surface parking spaces for customers. The total site area is 5.45 hectares.
- 2.2 The site is bounded by Syon Lane on its southern side which is lined with two storey semi-detached residential properties on its south side. There are similar residential properties to the west and north west and to the north east lies the Sky campus. The Grade II listed Gillette building lies to south east at the junction of the Great West Road and Syon Lane. The surrounding area comprises a mix of uses including commercial and residential as well as extensive recreational grounds to the north and west.

### Historical background

#### *The development of the area*

- 2.3 Osterley is a district of the historic parish of Isleworth which alongside Brentford was established before the Roman occupation of Britain, 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. 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' (fig. 1).



Figure 1: Brentford area, OS 1856

- 2.4 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.

#### *Osterley House and Park*

- 2.5 The Manor of Osterley passed through many hands from its first recorded mention in the 13th century when its woods were the resort of wild cattle and outlaws. It wasn't until 1562, when Sir Thomas Gresham took it over and built his large manor house that the present structure of the park began to evolve. Around 1760 the then owner Sir Francis Child Robert Adam remodelled the old house to create lavish new rooms inside and landscaped grounds with a chain of lakes.
- 2.6 From the early 19th century the estate was owned by the Jersey family. In 1949 George Child Villiers, 9th Earl of Jersey gave the property to the National Trust. Currently the house is undergoing a restoration project which is hoped to be completed in 2020. The house and its grounds are grade II listed and largely make up the Osterley Park Conservation Area.
- 2.7 Up until the mid-20th century, the Osterley estate, except for the part reserved as parkland and for the part used as a golf-course, was still agricultural land. Jersey Road is the southern boundary of Osterley Park and the park wall edges the road for some distance. For most of its length Jersey Road contains large houses of the 1930s to mid-20th century, most in the mock Tudor style. The golf course, playing and sports fields and relic walls and buildings such as those around Wyke Green extend the historic rural character of Osterley all the way to and including the Grand Union Canal.

#### **The 19<sup>th</sup> century**

- 2.8 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.

- 2.9 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 Road<sup>1</sup>**

- 2.10 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 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

<sup>1</sup> A more detailed history of the Great West Road can be found as Appendix A

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. 2<sup>2</sup>).

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

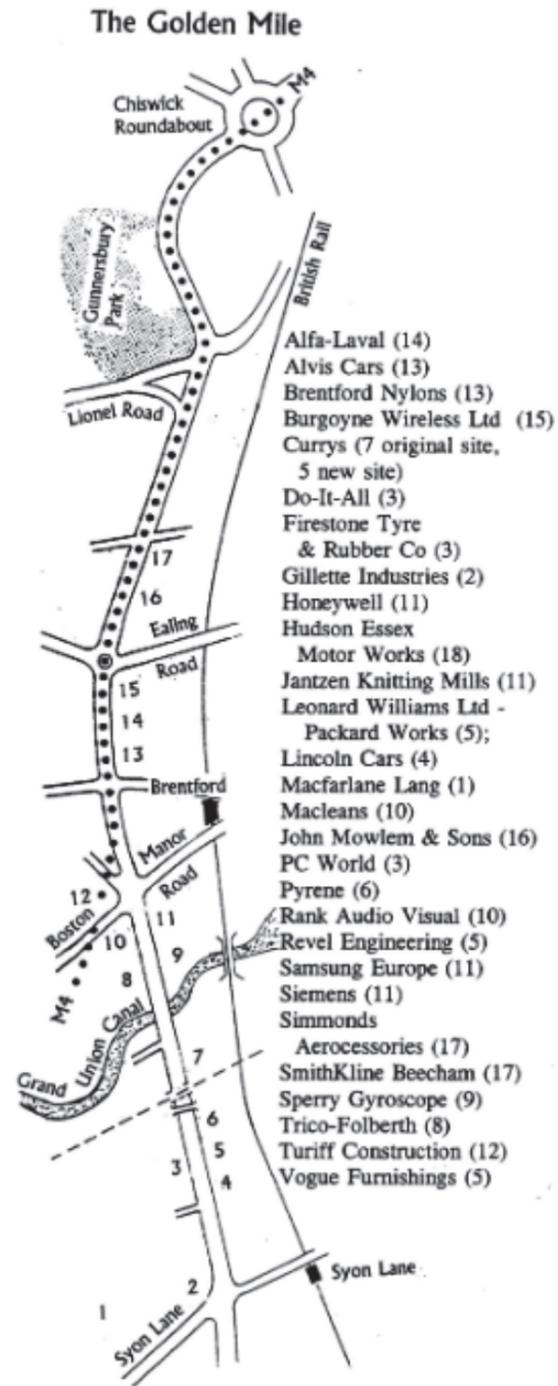


Figure 2: The companies of the Golden Mile in its heyday

- 2.11 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.
- 2.12 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.
- 2.13 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.
- 2.14 Post-war the changes brought about by the shift in the manufacturing economy away from its traditional centres couple 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.
- 2.15 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'<sup>3</sup> 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.

- 2.16 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'<sup>4</sup>. Together with Western Avenue, and the linking North Circular Road, it

<sup>3</sup> Harold Clunn, *The Face of London* (1963), 502.

<sup>4</sup> *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'<sup>5</sup>.

#### The Tesco site

- 2.17 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. 3<sup>6</sup>).



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

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

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

2.18 The 1936 OS map shows how the area has started to change as a result of the arrival of the A4 (fig. 4<sup>7</sup>). The site is now home to the extensive Imperial Biscuit Works which had been built in 1931. The Gillette factory would be built the following year, 1937.

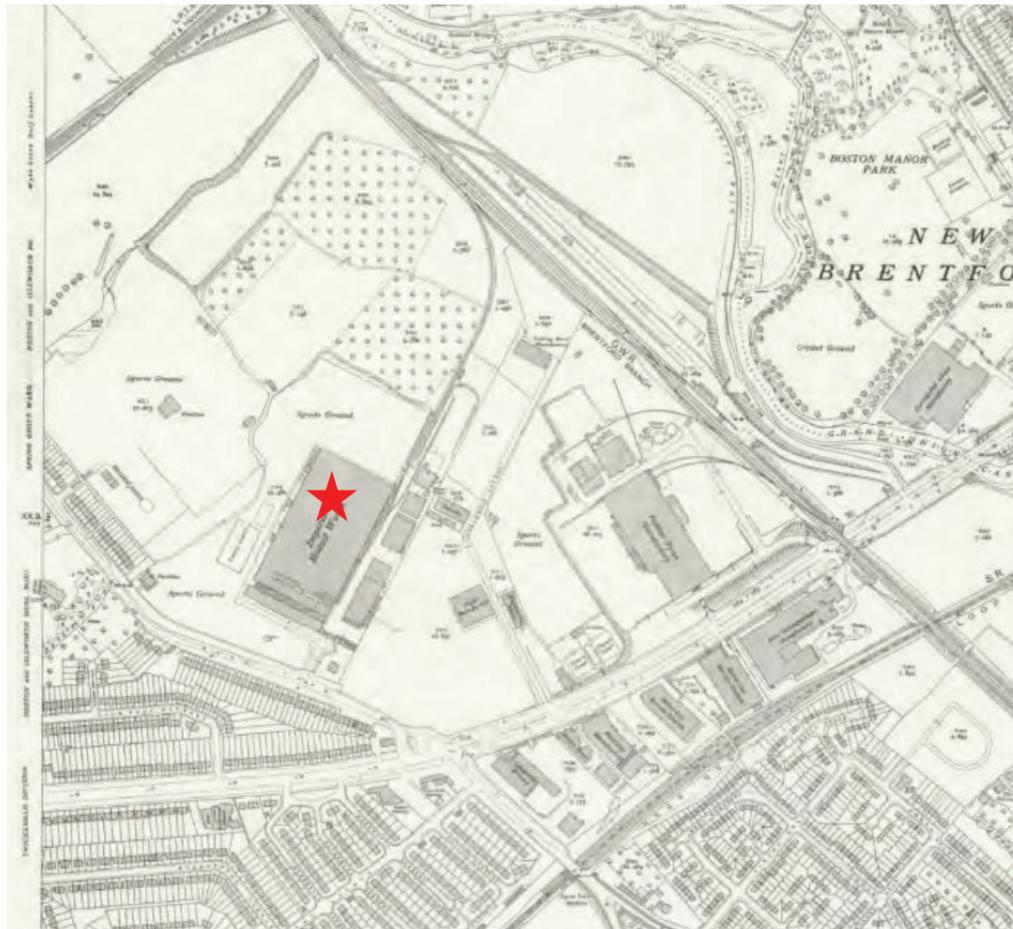


Figure 4: The area around the Imperial Biscuit Works (starred), OS 1936

2.19 The aerial photograph of 1935 shows the site and its immediate surroundings including the biscuit works, Gillette factory and newly built housing (Fig. 5<sup>8</sup>).

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

<sup>8</sup> Britain from Above: EPW059345 ©Historic Environment Scotland.



Figure 5: The Gillette Factory, Imperial Biscuit Works and Great West Road, Osterley, 1938

2.20 By 1961, the OS shows the extensive light industrial, as well as residential, development that has taken place during the course of the 20<sup>th</sup> century (fig. 6<sup>9</sup>).

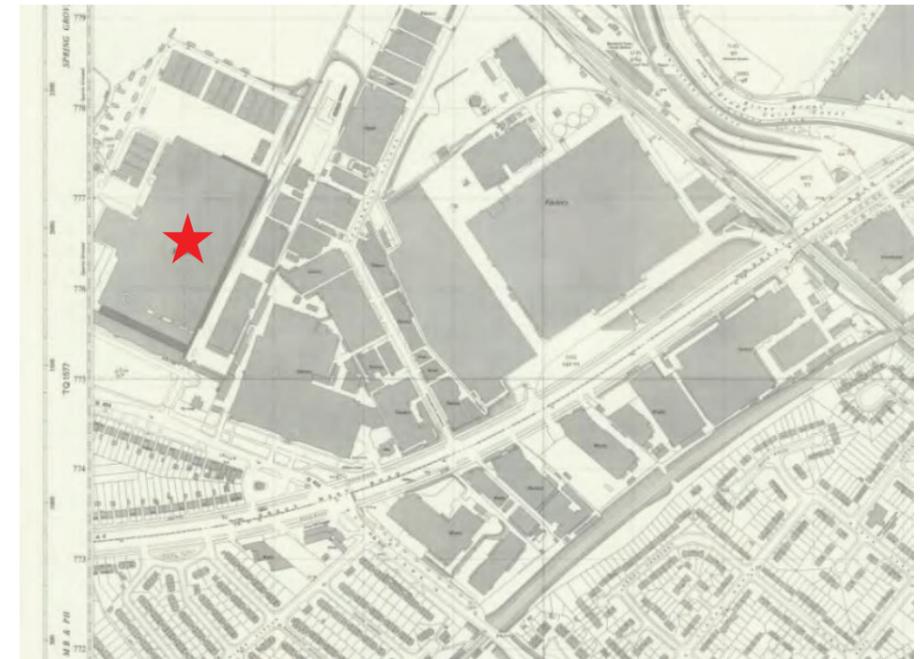


Figure 6: The area around the site (starred), OS 1961

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

- 2.21 The Tesco site largely covers the area of what was the United Biscuits works. United Biscuits was formed in 1948 when MacFarlane Lang, one of the largest manufacturers of biscuits in Britain, merged with McVitie & Price. MacFarlane Lang and Cos Imperial Biscuit Works was opened on the site in 1931 replacing its smaller Imperial Biscuit Works in Fulham. MacFarlane Lang was one of the largest manufacturers of biscuits in Britain in the early 1900's and merged with McVitie & Price in 1948 to form United Biscuits. There were also extensive sports facilities for workers. The factory closed in 1980.
- 2.22 An application (ref 01106/B/P82) for demolition of existing offices and erection of 70,000 ft<sup>2</sup> superstore (Tesco), petrol station, access road, servicing and highway alteration and car park was approved in 1993. Tesco opened for business in 1995.

### 3 The heritage significance of the site and its surroundings

#### Introduction

- 3.1 This section of the report describes the heritage significance of the site and its surroundings. Emphasis is placed on heritage assets as key components or 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 1.5 km to the north of the Isleworth Riverside Conservation Area 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 2 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 site is adjacent to the Osterley Park Conservation Area (CA13), and a small section of site on the north western side of Macfarlane Lane is within the conservation area. Nearby conservation areas include the Butts (CA 3); Isleworth Riverside (CA 11); Grand Union Canal & Boston Manor (CA 22 ); and Spring Grove (CA 24). The Osterley Park Conservation Area was extended in 2019 and now includes Oaklands Avenue and Gower Road immediately to the north west of the site, residential streets to the south of Syon Lane and north of the A4, as well as the open space with its Grade II sports pavilion to the north west of MacFarlane Lane. The strip of land within the site

to the west of MacFarlane Lane falls within the boundary of the Osterley Park Conservation Area.

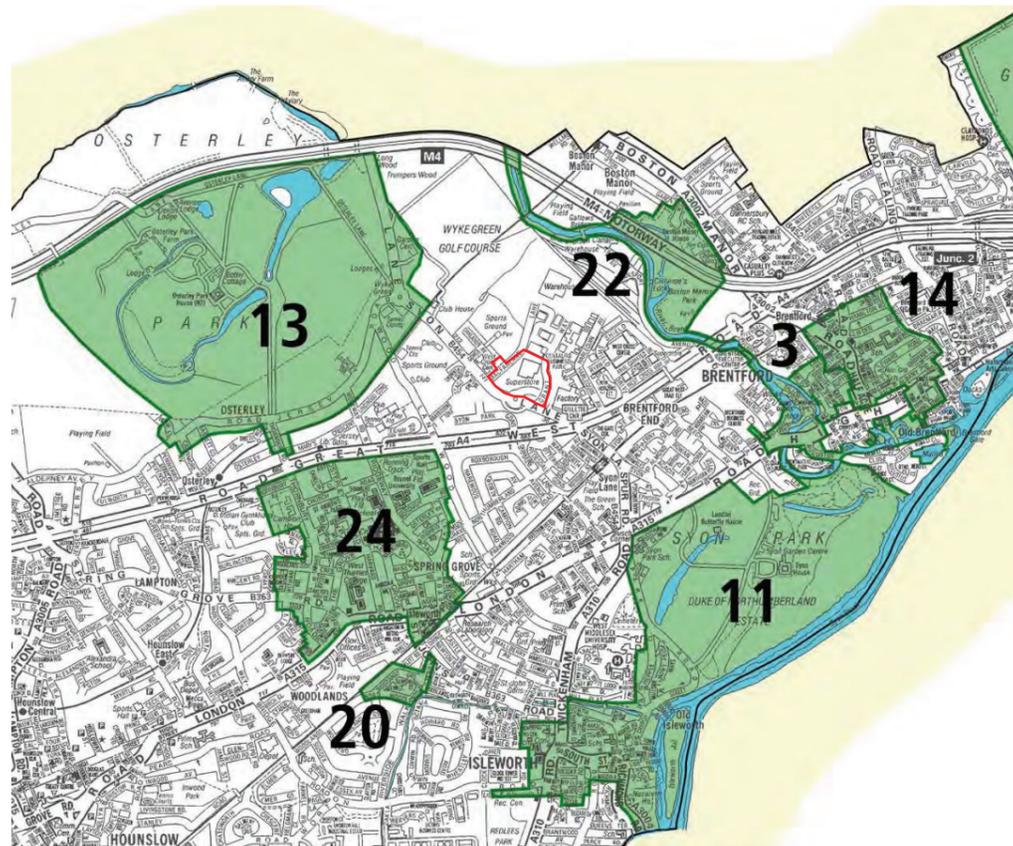


Figure 7: Conservation areas in the vicinity of the Tesco site (outlined in red) – see Figure 8 below

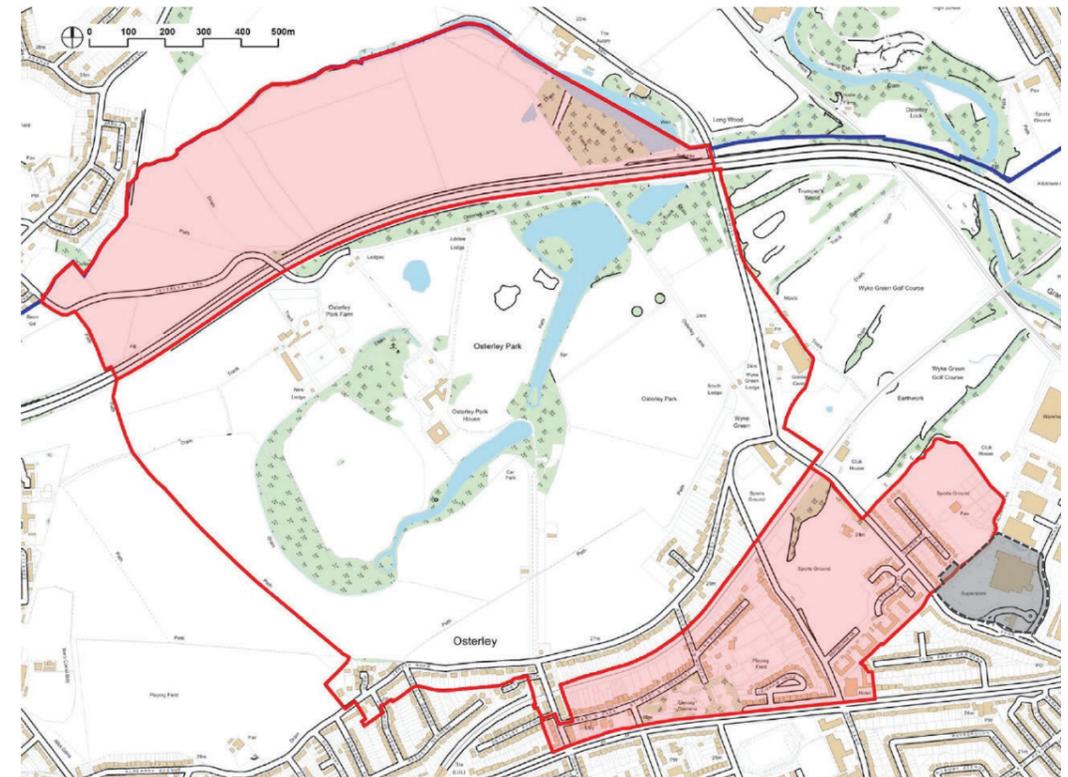


Figure 8: The 2019 extension to Conservation Area 13, Osterley Park: extensions designated in 2019 are shaded red. The site is indicated in grey tone and dotted line.

### Listed Buildings

3.5 There are a number of listed buildings in the vicinity of the site (fig. 9<sup>10</sup>). They include

#### Grade I

- Boston Manor House
- Osterley House
- Osterley House Stables and the Aviary and Temple in Osterley Park
- Syon House

<sup>10</sup> 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

Syon Lane

- K6 telephone kiosk outside Gillette Building;

Twickenham Road

- Busch House School
- Thanet House

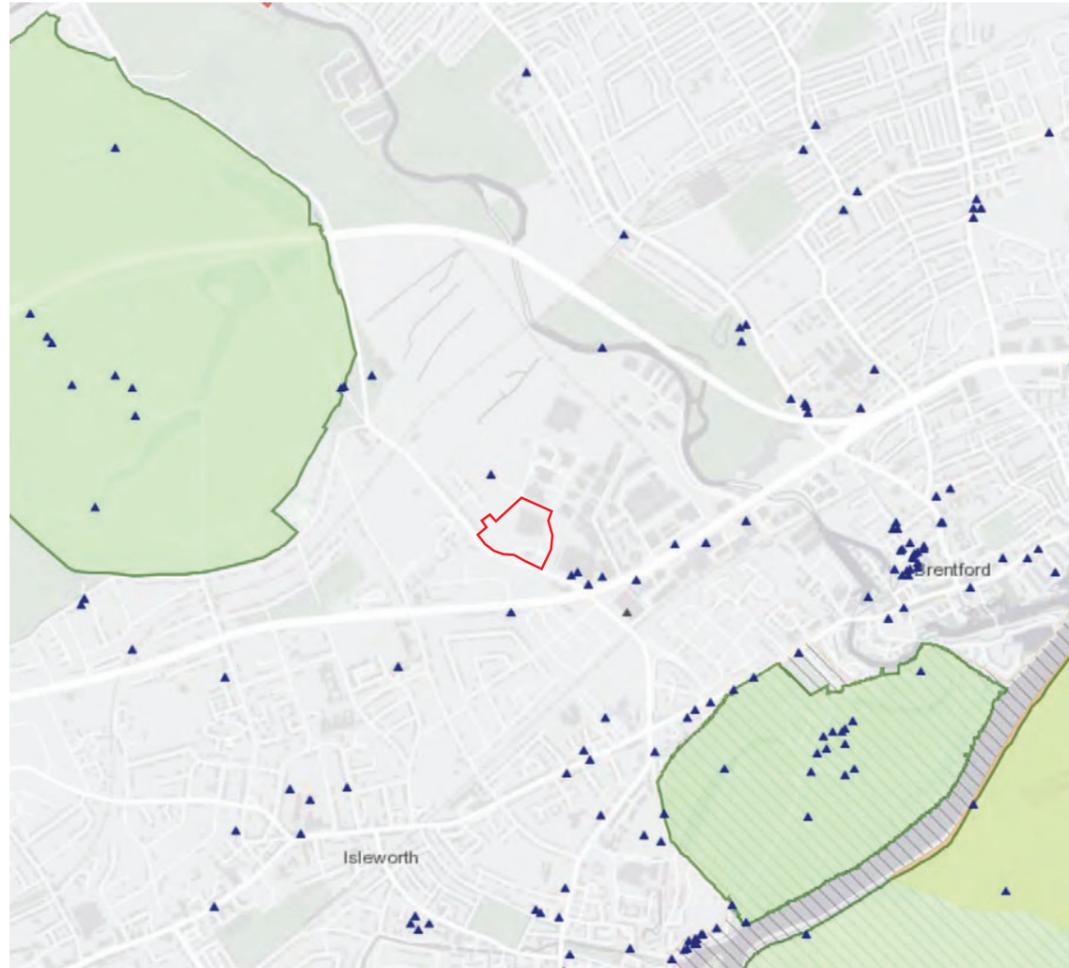


Figure 9: Listed structures (triangle) near the Tesco site (outlined in red). Green shading indicates registered landscapes and the hatching indicates the World Heritage Site buffer zone (the World Heritage Site itself is indicated in light green on the bottom right). See also Figure 13

### 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.<sup>11</sup> 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

<sup>11</sup> London Borough of Hounslow (2019) Local List, September 2019.

listed buildings or structures can be considered as ‘non-designated heritage assets’.

- 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 Park Conservation Area, Grade II listed buildings such as the sports pavilion to the northwest, 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, conservation areas and other Grade I and II\* listed buildings.

- 3.12 That is not to say that conservation areas, 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 given the nature of the Grade I and II\* registered landscapes are more likely to experience an effect from the development.

#### **The significance of the site and its context**

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

- 3.13 The Tesco 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 20<sup>th</sup> 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’s<sup>12</sup> ‘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 19<sup>th</sup>, 20<sup>th</sup> and 21<sup>st</sup> centuries

<sup>12</sup> Now Historic England

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.

*‘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 some architectural quality compared to other buildings in the vicinity and is associated with the architect Nicholas Grimshaw<sup>13</sup>. There is a marked contrast

<sup>13</sup> On 3rd December 2019 a Certificate of Immunity from Listing was issued under the Planning (Listed Buildings and Conservation Areas) Act 1990 as

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 heritage assets in the vicinity of the site (including 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 20<sup>th</sup> 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, from 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

amended, as the Secretary of State does not intend to list this building to which the notice relates for a period of five years. Historic England: Certificate of Immunity Number: 1467343 (Start Date: 03-Dec-2019 / Expiry Date: 02-Dec-2024)

quality later development that detracts from their special interest.

3.21 This latter point is important in considering later the level of harm that might be caused by a change in the setting of the heritage assets in the vicinity of the site. The nature of the present setting of the heritage assets in question already causes an existing level of less than substantial harm to their heritage significance. For instance, the existing Tesco building can hardly be said to do anything other than harm the setting of the Grade II Gillette building or the Osterley Park Conservation Area – it is an indisputably ugly building surrounded by large areas of tarmacked surface parking. It lacks any aesthetic or architectural merit and is antithetical to a positive and good quality urban environment.

3.22 It should be noted that the character and appearance of the Osterley Park Conservation Area falls into two parts – that of the registered landscape and its listed buildings (which is addressed below) and its 20<sup>th</sup> century suburban edge. The recent extension of the conservation area expands the extent of this latter category that is included in the conservation area, and in which the sole listed building is the Grade II pavilion and clubhouse in the Macfarlane Lane sports ground.

*Heritage assets further afield*

3.23 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**

3.24 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.

3.25 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*

3.26 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

- 3.27 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).
- 3.28 The Syon site now includes a 20<sup>th</sup> century garden centre, a hotel and a large area of surface car parking.
- 3.29 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'.
- 3.30 It continues:

*Syon Park is situated c 6km to the west of the centre of London<sup>14</sup>, 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,*

<sup>14</sup> This is incorrect, or relies on an unusual definition of 'the centre of London'. Syon House is, in fact, over 13km from Charing Cross.

*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.*

- 3.31 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.*

- 3.32 The proposed development site is approximately 1.5 km north west (to the centre of the site) from the west-facing entrance to Syon House.
- 3.33 The heritage significance of Syon House and its landscape can be summarised as follows:
- It is an example of the country house typology and of a medieval structure adapted to become a country house in the 18<sup>th</sup> 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.
- 3.34 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.
- 3.35 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.*

- 3.36 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 17<sup>th</sup> century battlemented lodge houses. Beyond this, the Great Lime Avenue extends to the lake. Figure 10 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 18<sup>th</sup> century landscape design.

- 3.37 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 10: Syon House in relation to the site (circled). 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 20<sup>th</sup> century access route is indicated by a dotted purple line

*Osterley Park*

3.38 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*

3.39 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).

3.40 The M4 motorway, built in 1974, more or less divides Osterley Park in half.

3.41 The list description for the Grade II\* registered landscape describes in overall terms the 'C 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 18<sup>th</sup> century landscaping is attributed to Mrs Robert Child, sister-in-law of Robert Adam's client Sir Francis Child, and her steward, Mr Bunce

3.42 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.*

3.43 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.

3.44 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.

3.45 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.

3.46 Osterley is organised on a 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.

3.47 The comments concerning the significance of the informal, pastoral aspects of the Syon landscape also apply to Osterley.



Figure 11: Osterley House in relation to the site (circled). 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

3.48 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.

3.49 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.

- 3.50 In the case of both sites, the city 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.
- 3.51 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. Along with suburban housing and the Gillette tower, other tall modern development can be seen.

### **Boston Manor**

- 3.52 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.
- 3.53 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 cuspings, 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*

- 3.54 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 17<sup>th</sup> century house.
- 3.55 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**

- 3.56 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.
- 3.57 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.*

- 3.58 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 (circled) 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 assets<sup>15</sup>.

- 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*<sup>16</sup>

- 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 W4<sup>17</sup>.
- 4.7 The Inspector notes that the Judge in *Bedford* (our emphasis):

<sup>15</sup> APP/K5600/W/16/3149585, decision dated 12 June 2017

<sup>16</sup> 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 – in this case, the Hoover Building and other listed buildings and structures nearby. Harm to non-designated heritage assets is not allocated a level.

<sup>17</sup> 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'.

...set out his understanding of what the Inspector had been looking for when applying a test of 'something 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 users<sup>46</sup>; 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’.<sup>18</sup>

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:*

<sup>18</sup> 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).<sup>19</sup>
- 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

<sup>19</sup> 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 2019 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**<sup>20</sup>

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 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 current London Plan (2016) is still the adopted development

<sup>20</sup> Mayor of London (2019) London Plan: Intend to Publish London Plan 2019, December 2019.

- Plan, but the new London Plan is a material consideration in planning decisions.
- 4.40 On Friday 13 March 2020, the Secretary of State for Housing, Communities and Local Government wrote to the Mayor of London ‘on the need for an improved London Plan’ and to exercise his powers under section 337 of the Greater London Authority Act 1999. He has directed that the Mayor cannot publish the London Plan until it incorporates the Directions the Secretary of State sets out. These Directions are contained in an Annexe to the Secretary of State’s letter. They cover a range of matters. The sole design policy that the Secretary of State seeks to amend is Policy D3, requiring the optimisation of site capacity
- 4.41 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 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.’*
- 4.42 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.’*
- 4.43 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’.*
- 4.44 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**
- 4.45 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.
- 4.46 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.’*
- 4.47 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.
- 4.48 The council will expect development proposals to<sup>21</sup>:
- ‘(i) Conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance;*

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<sup>21</sup> Relevant parts quoted

*(j) Retain, conserve and reuse a heritage asset in a manner appropriate to its value and significance;*

*(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**

- 4.49 The Council has 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.
- 4.50 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 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 parameter plans, design code and development specification prepared by JTP Architects. Further information on the illustrative scheme is provided in the Design & Access Statement. Reference should also be made to the Townscape And Visual Impact Assessment; the townscape views within that document 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 proposed development would replace the existing large Tesco store and its associated car-parking with a residential-led regeneration scheme that has the capacity to create, along with the associated redevelopment of the Homebase site, a meaningful place with character and identity while respecting the setting of heritage assets in its context. Those assets, as analysed earlier, exist at present in a context that detracts from their setting. While this is less the case in terms of more distant assets such as Osterley Park and Syon Park, it is certainly true of the setting of the listed and locally listed buildings in the immediate vicinity of the site.
- 5.3 The proposed development involves the optimisation of a site within the Great West Road Opportunity Area, and includes buildings ranging from 2 storeys up to 17 storeys in height. The effect of this height and the visibility of the proposed development 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. In this way, for instance, the development will step up from the lower scale of the conservation area to the northwest to an area of greater height closer to the Sky campus to the northeast. Similarly, the development has been examined in relation to the Gillette tower, and the massing and height of proposed buildings in its backdrop adjusted to preserve its pre-eminence in views from the area around the site. This process has included considering the effect on the setting of the other heritage assets in the immediate hinterland of the site, as identified in Section 3 and including the listed sports pavilion and club house to the west of the site.

- 5.4 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 Homebase 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.
- 5.5 It is important to state clearly that the heritage significance of both Osterley and Syon does not rely on an 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 20<sup>th</sup> century incursion of the Gillette tower should not be present, nor any other modern development that can, at present, be seen from Syon Park.

- 5.6 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 Syonhill 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 Syonhill Gardens schemes in wire line.

- 5.7 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

- 5.8 The proposed development 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 near an important junction on the Great West Road and by responding to the size and presence of the Gillette Building, will both help (along with the Syon Lane 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 and that of the Osterley Park Conservation Area, 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 Syon Park, Osterley Park and Boston Manor, and no effect on the Kew World Heritage Site. The proposed development will, on balance, preserve the setting of heritage assets and not cause harm to their heritage significance, and will bring significant public benefits.

5.9 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 development 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 lower scale of the conservation area to the northwest to an area of greater height closer to the Sky campus to the northeast. 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.
- 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.

**Public benefits**

5.10 The proposed development will provide the following public benefits:

- Up to 1,677 new homes, making a substantial contribution towards the target of 7,500 new homes within the Great West Corridor Opportunity Area;
- 35% of new homes would be affordable, including affordable rent and intermediate
- A new local hub providing between 3,000 sqm and 5,000 sqm of office, retail and community facilities and supporting up to XX new jobs;

- A minimum of 20,000 sqm of publicly accessible open space, including the enhanced Water Gardens, a plaza lined with active retail and community use frontage, and a new green public garden;
- A minimum of 5,000 sqm play space, encouraging health and wellbeing and providing opportunities for play for residents of the development and the wider community;
- A landscape designed to deliver net biodiversity gain, including new green and blue spaces, the provision of around 300 new trees, green roofs, and increasing the variety of habitats on site;
- Opening up the site to increase permeability by providing new pedestrian and cycling connections through the site, including the provision of new 'clean air routes' away from the busyness of surrounding roads;
- Improvements to pedestrian routes across the Great West Road, enhancing the connection to the relocated Tesco store and Syon Lane station;
- Extensions to the E1 and H28 bus services, improving public transport accessibility for residents in and around Syon Lane and for workers in the Sky campus;
- The provision of a mobility hub to encourage use of sustainable modes of transport;
- The provision of 10 car club bays and all residential parking spaces to be either active or passive electric vehicle charging points;
- Zero carbon development, with 35% reduction of carbon emissions on-site coupled with a carbon offset contribution;

- High quality architecture that responds to local characteristics of the Great West Corridor.

**Pre-application advice**

5.11 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.
- 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 development 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 development 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 development 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 development*

- 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 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 and in the previous section of this report.
- 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 development 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 development 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 development is consistent with the current London Plan. The proposed development is of ‘the highest architectural quality’ and includes ‘details and materials that complement... the local architectural character’. The proposed development 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 development 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 development.
- 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 conclusion

- 7.1 This report has been prepared to support an outline planning application for a proposed residential led, mixed-use development of the site at the Tesco site, Syon Lane, Isleworth, TW7 5NZ. 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 development.
- 7.3 The proposed development 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 development 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 and that of the Osterley Park Conservation Area, 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 Syon Park, Osterley Park and Boston Manor, and no effect on the Kew World Heritage Site. The proposed development will therefore, 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 development 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.<sup>22</sup> ‘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’.<sup>23</sup>
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

<sup>22</sup> Wikipedia: [https://en.wikipedia.org/wiki/Golden\\_Mile\\_\(Brentford\)](https://en.wikipedia.org/wiki/Golden_Mile_(Brentford))

<sup>23</sup> 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.<sup>24</sup>

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.<sup>25</sup> 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

<sup>24</sup> 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].

<sup>25</sup> 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.<sup>26</sup>

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.
5. 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),<sup>27</sup> the factories along the Great West Road escaped relatively unscathed. After the war, many were reused or converted into warehouses and offices.
6. 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.
7. 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

<sup>26</sup> *Ibid.*

<sup>27</sup> Harold Clunn, *The Face of London* (1963), p. 503.

by one forthright purpose-built retail store at the west end’<sup>28</sup> (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’).<sup>29</sup>

### Built heritage

8. The Great West Road has been described as ‘one of the finest arterial roads in the world’<sup>30</sup>, and ‘the chief showplace in outer London for the airy and hygienic factories of the light industries developed between the wars’<sup>31</sup>. 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*

<sup>28</sup> Bridget Cherry and Nikolaus Pevsner, *The Buildings of England. London 3: North West* (2002), 385.

<sup>29</sup> Phil Philo, *GLIAS Notes and news*, August 1987.

<sup>30</sup> Harold Clunn, *The Face of London* (1963), 502.

<sup>31</sup> 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.*<sup>32</sup>

9. 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’.

<sup>32</sup> *Ibid.*, p503.



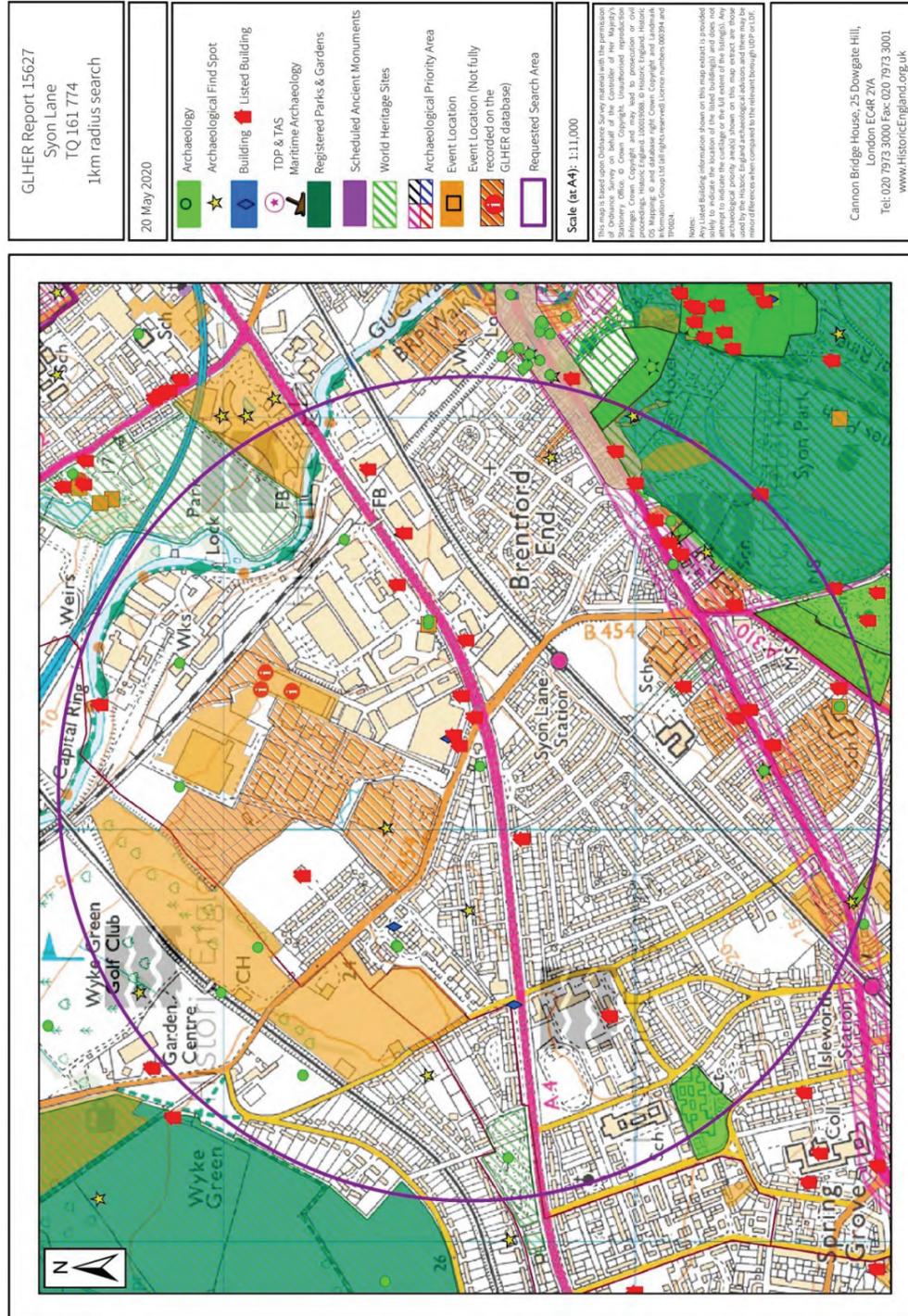
Park, 1990-1 by Markheath Securities ('yellow brick with a plethora of post-modern trappings').<sup>35</sup>

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<sup>35</sup> 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).



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