



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

For the attention of Shane Baker, Case Officer

18 November 2020

Dear Shane,

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

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

Objections

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

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

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

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

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

and

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

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

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

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

CC4 (Heritage) states that all developments should *'Conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance'* and that developments should *'Conserve and enhance the internationally recognised Outstanding Universal Value of the Royal Botanic Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from the site'*.

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

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

The Environmental Statement for the Homebase application states:

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

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

Visual Impact Assessments: New Views Required

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

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

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

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

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

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

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

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





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

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

Yours Sincerely,

John Ricketts
Planning Trustee
The Kew Society