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Mr Nikolas Smith  
London Borough of Hounslow  
Development Control  
The Civic Centre, Lampton Road  
Hounslow  
TW3 4DN

Direct Dial: 020 7973 3802

Our ref: P00493991

17 February 2016

Dear Mr Smith

**Arrangements for Handling Heritage Applications Direction 2015 &  
T&CP (Development Management Procedure) (England) Order 2015  
LAND AT CHISWICK ROUNDABOUT GREAT WEST ROAD CHISWICK CHISWICK  
LONDON W4  
Application No 00505/EY/P18**

Thank you for your letter of 7 January 2016 notifying Historic England of the above application.

Historic England received a pre-application presentation of the scheme at a late stage in the process on the 5<sup>th</sup> of November 2015, shortly before it was submitted as a formal application (21 December). At that time we raised serious concerns with the applicant regarding the scale and potential impact of the proposals and noted reservations regarding the assessment methodology. These concerns were shared with your Council. The submitted design remains unchanged from that seen at pre-application.

The proposals were considered by our London Advisory Committee on 4 February and the formal Historic England position is set out below.

**Summary**

The proposals are to clear the vacant site immediately north of the Chiswick Roundabout and to construct a tall building development consisting of two principal tower elements; one reaching 120m AOD and the other 109m AOD. A mix of uses is proposed including retail, commercial and residential.

There are no heritage assets on the existing site, however, the Grade II\* Gunnersbury Mansion within its II\* registered landscape is in close proximity to the north and there are a number of conservation areas nearby. Due to the scale of the development, there are a high number of designated heritage assets affected by the proposals, including the Kew World Heritage Site (& CA), the Strand on the Green conservation area and the Kew Green conservation area.



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Historic England considers these development proposals would result in substantial harm being caused to the Strand on the Green and Kew Green conservation areas. We consider that the proposals will have an adverse impact on the Royal Botanic Gardens Kew World Heritage Site, compromising a viewer's ability to appreciate its outstanding universal values. Appreciable adverse harm has also been identified to additional designated heritage assets including the grade II\* registered Gunnersbury Park. We consider the proposals would fail to meet the requirements of statute and policy and would therefore not be sustainable development.

The effects of the proposals would be serious and certainly raise issues of more than local significance. Should the London Borough of Hounslow be minded to grant permission Historic England will request that the Secretary of State call-in the application for his own determination.

### Historic England Advice

#### *Significance of the Historic Environment*

In the 18th century, the area surrounding the development site largely consisted of farmland, rural market gardens and orchards. Gunnersbury Park, with its "large" and 'small' Mansions, dominates the area to the north. Rapid development is evident from the 1890s with the introduction of the North and South Western Junction Railway and the laying out of residential streets which now make up the Wellesley Road Conservation Area. The immediate development site consisted of Gunnersbury Cottage and associated farmland and the land use remained the same into the 20th century.

**Royal Botanic Gardens, Kew** is located south of the development site within the London Borough of Richmond upon Thames. It was inscribed as a UNESCO World Heritage Site in 2003. It is also a Grade I Registered Park & Garden, Metropolitan Open Land and a conservation area. It contains 44 listed buildings.

The Outstanding Universal Value (OUV) of Kew Gardens includes:

- a rich and diverse historic cultural landscape providing a palimpsest of landscape design;
- an iconic architectural legacy;
- globally important preserved and living plant collections;
- a horticultural heritage of keynote species and collections.

Illustrating significant periods in garden design from the 18th to the 20th centuries, this historic landscape garden includes work by internationally renowned landscape architects including William Kent, Charles Bridgeman, Capability Brown and William Nesfield. It also houses 44 listed buildings designed by architects including William



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Chambers and Decimus Burton. The gardens contain extensive botanic collections (including living plants and trees) that have been enriched over three centuries. Since their creation in 1759, the gardens have made an internationally significant contribution to the study of botany and horticulture. Buildings including Kew Palace, The Orangery and follies such as the Pagoda (all Grade I listed) highlight the royal significance of the earlier history of the gardens. Later buildings illustrate the development of a scientific collection in the 19th century, and include The Palm House (also Grade I), which is one of the most important 19th century iron and glass structures in the world, and remains a focal point within the site.

**Gunnersbury Park** is a Grade II\* registered landscape and a conservation area. Gunnersbury Park & Cemetery are also designated as Metropolitan Open Land. The park covers 186 acres and contains over 21 listed buildings including the Grade II\* listed Gunnersbury Park House ('The Large Mansion'); Gunnersbury House ('The Small Mansion') and the II\* listed Orangery. As a private estate, the park was home to a host of notable owners, including the 17th century lawyer and politician John Maynard; Princess Amelia, daughter of King George II and the Rothschild family.

The adopted conservation management plan (currently being updated) identifies the landscape as 'perhaps its most significant asset'. Whilst it has evolved over time, it is recognised that its greatest contributors were William Kent and Sir William Chambers (both C18). Indeed, some of the landscaping could date from the early years of Princess Amelia's occupation, with the terrace, south lawn, Orangery and walls south of the house laid out in the C17. Significant funding by both the Heritage Lottery Fund and Historic England has been committed to restore the buildings and landscape under the Gunnersbury 2026 project.

Kensington Cemetery (laid out in 1929) lies to the south of Gunnersbury Park and is included within the Gunnersbury Conservation Area. The land historically formed part of the Gunnersbury Park estate and was purchased by the Borough from the Rothschild family. Its most notable architectural feature is the Katyn Memorial, a black obelisk designed by Louis Fitzgibbon (1976).

**Kew Green Conservation Area** is focused around Kew Green and contains a high number of listed buildings. Those buildings not protected by statutory listing are understood to be included on LB Richmond's local list of buildings of townscape merit. Much of the conservation area, including the Green, lies within the World Heritage Site buffer zone. Kew Green was designated due to its exceptional character as an historic open space, the associated high quality of the mostly C18th development and its superior riverside environment. It is a visually cohesive area with a clearly identifiable sense of place and distinctive character; still legible as the archetypal village green.

The entrance to Kew Gardens lies to the west of the Green, part of which is included within the WHS boundary due to the historic location of entrance lodges. The Green is



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surrounded by large 18th and 19th century houses, many of which are listed and which through the quality of their architecture add formal grace to the central area. High boundary walls containing mature gardens provide a sense of privacy and enclosure. St. Anne's Church (Grade II\* - 1710-14), in striking yellow brick, sits on the Green itself. There is some modern development which has respected the characteristic scale. The Riverside acts as foil to the Green and its peaceful semi-rural character.

**Strand on the Green Conservation Area** lies on the banks of the Thames and is framed by the two river crossings of Kew Bridge and Kew Railway Bridge (both Grade II listed). It remains legible as a small riverside ribbon development of a village from the 18th and early 19th centuries. Much of its special interest lies in its tranquil riverine setting and the advantageous views from the south side of the river. It includes an attractive assemblage of buildings including fishermen's cottages, boat builders' sheds, public houses and maltings, alongside larger and more elegant private houses. The majority of the houses along the Thames path are listed. The largely consistent scale of the buildings and the tranquil river setting are unifying features.

The riparian banks of the conservation area are given further recognition through inclusion within the Dukes Meadow area of Metropolitan Open Land. This runs along the banks of the Thames to the eastern periphery of the Borough boundary and also includes the Grove Park and Chiswick House conservation areas.

**Wellesley Road Conservation Area** lies to the south of the proposed development site and consists of an enclave of low rise residential Victorian properties reflecting the 19th century pattern of development on the ancient route of Wellesley Road. The special character and appearance of the area is the result of the good Victorian quality of architectural detailing and the consistent domestic scale and grain of the residential properties.

**Chiswick Park** is a Grade I registered park & garden and includes a number of heritage assets of the highest significance including the Palladian Villa of Chiswick House; the Deer House; the Conservatory and the Obelisk, all of which Grade I listed buildings. The grounds, which have been described as the birthplace of the English Landscape Movement, consist of pleasure grounds, walled gardens, and parkland. Largely laid out by Lord Burlington and influenced by William Kent and his early ideas on informal landscaping. The pleasure grounds are situated to the east, north, and west of the House and are within the Dukes Meadow area of Metropolitan Open Land.

### *Impact of the Proposals*

The proposals are to construct a tall building of two tower elements, one reaching 120m AOD (32 storeys) and the other 109m AOD. A mix of uses is proposed including retail, commercial and residential. The building will be of curvilinear form and clad with



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a range of coloured fins of differing design and orientation. Advertising, targeting vehicular traffic on the M4, will be integrated into the design.

At 120m (AOD) the building will be visible from a large number of locations including within the Kew World Heritage Site, the Grade II\* registered landscape of Gunnersbury Park and a number of conservation areas including Strand on the Green and Kew Green.

The applicant states that the development of the site will deliver enhancement to public realm whilst delivering a substantial amount of new office and residential accommodation. It is suggested this will act as a catalyst to the regeneration of the wider area.

The applicant's townscape, heritage and visual impact assessment indicates that where the development would be seen in conjunction with listed buildings its architectural qualities would make it a positive addition to the background setting of those designated assets. Similarly, the heritage consultant considers that the quality of the architectural response to its context has positive effects on the setting of all of the conservation areas considered. Furthermore, where the development would appear visible in views within the World Heritage Site looking towards the Orangery and Kew Palace, the consultant considers the quality of the design of the proposed development means it will be a suitable addition that will do no harm.

#### *Relevant Policy and Legislation*

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it a statutory duty for Local Planning Authorities to consider the impact of proposals on listed buildings. They are required to have **special regard** [my emphasis] to the desirability of preserving the setting of a listed building. Section 72 requires that **special attention** [my emphasis] shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Guidance on the fulfilment of statutory planning duties is set out in the Government's National Planning Policy Framework 2012 (NPPF). Fundamental to the NPPF is a presumption in favour of sustainable development. This includes a core principle which states that heritage assets should be conserved in a manner appropriate to their significance. Section 12 of the NPPF is devoted to the conservation and enhancement of the historic environment, and includes the following paragraphs of direct relevance to this case:

- Paragraph 131 - Local Authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.
- Paragraph 132 - Local Authorities should put great weight on an asset's



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conservation, and the more important the asset the greater the weight of consideration. The significance of an asset can be **harmed by development within its setting** [my emphasis].

- Paragraphs 133 and 134 set out the tests applied to any harm to designated heritage assets that must be met if harm is to be justified.
- Paragraph 137 - Local Planning Authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance.

This guidance is clarified further in case law. Following the ruling in *Barnwell Manor Wind Energy Limited v East Northamptonshire District Council*, English Heritage, the National Trust and the Secretary of State for Communities and Local Government [2014] EWCA Civ 137, considerable importance and weight should be given to the desirability of preserving the setting of a listed building when carrying out the planning balance. Less than substantial harm does not equate to a less than substantial planning objection. There is a presumption that preservation is desirable.

### London Plan (20011)

The strategic policy framework for development in London is set out in the London Plan (adopted by the GLA in July 2011). Policy (7.10 B) states that 'Development should not cause adverse impacts on World Heritage Sites or their settings (including any buffer zone). In particular, it should not compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance...'. The accompanying explanatory text (7.36) states that 'Development in the setting of World Heritage Sites must contribute to the provision of an overall amenity and ambience appropriate to their World Heritage Status'.

Policy 7.7A concerns the approach needed in the location and design of tall buildings. It states that 'tall and large buildings should not have an unacceptably harmful impact on their surroundings'. 7.7E requires tall buildings proposed in sensitive locations to be given particular consideration and cites the setting of a listed building or conservation area as an example of a sensitive location.

Policy 7.8D outlines the approach needed in arriving at planning decisions that impact on the historic environment: 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural details.'

Policy 7.4 relates to the importance of local character. It sets out in 7.4A and 7.4B that new development should have regard for the scale, proportion and mass of existing construction, and that 'existing buildings that make a positive contribution to the



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character of a place [should be allowed] to influence the future character of the area.’

### Local Planning Policy Context

The planning application appears to have been submitted in advance of the policy context for the Golden Mile/Great West Corridor being finalised. Within this wide area the Council have identified that there may be some sites with suitability for tall buildings to meet their aspirations for growth, however, these sites have not been specified yet. Recently adopted policy SV1 states that the Council will carry out further urban design work to identify where tall buildings could be located.

Local Plan Policy CC3 for Tall Buildings notes the heritage constraints that will affect building heights in some locations. This notably includes the impact on the Kew World Heritage Site and the highly designated landscapes within Hounslow itself. It also highlights the need to work with Historic England and the Royal Botanical Gardens.

A public consultation on Issues and Options for this area is currently underway, including initial urban design work. While the topic paper on design and conservation which accompanies this consultation does not contain detailed information about appropriate building heights, it suggests that proposals for tall buildings on sites that would be visible from Kew should be resisted by Hounslow Council.

Local Plan Policy GB1 covers Green Belt and Metropolitan Open Land. Section (h)(i) notes that development proposals will be expected to “**maintain the openness, setting and visual amenity** [my emphasis] where it is located near the Green Belt and Metropolitan Open Land, with particular attention given to the location, setting, design, materials, height and landscaping”.

Local Plan Policy CC4 covers Heritage. Sections (d) and (q) gives specific recognition of the need 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.

Also contained with Policy CC4, section (h) relates to conservation areas and specifies that “any development within **or affecting** [my emphasis] 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”.

### Historic England Guidance

Principle 4 of Historic England’s *Conservation Principles* states that ‘significant places should be managed to sustain their values’. Paragraph 140 of the same document



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addresses the nature of harm to heritage values stating: 'Places whose significance stems essentially from the coherent expression of their particular cultural heritage values can be harmed by interventions of a radically different nature.'

Historic England's guidance on *The Setting of Heritage Assets* states that setting may enhance an asset's significance and that 'where a development in the setting of a heritage asset is designed to be distinctive or dominant and, as a result, it causes harm to the asset's significance, there will need to be justification for that harm'.

Historic England's *Advice Note 4, Tall Buildings*, issued in December 2015 provides the following statement: 'There may be good planning reasons to seek an increased development density in an area, but tall buildings represent only one possible model for delivering higher density development. Alternative forms may relate more successfully to the local context'.

### *Historic England Position*

The area along the 'Great West Corridor' has been identified by Hounslow Council as a potential zone for tall buildings. However the Council acknowledges that further work is needed to specify appropriate sites and parameters. Notably, a previous scheme, the 'Great West Quarter' site in Brentford, was approved by the Council 2009 and has clearly had an adverse impact on the setting of Kew Palace and the Kew WHS. The potential for further adverse impact is of particular concern to Historic England and Royal Botanic Gardens, Kew.

The proposed tall building is clearly a marked departure from the existing environment of this part of Hounslow and, given its height and likely zone of visual influence, will be prominently visible within the setting of a high number of designated heritage assets. Historic England regrettably were not consulted on the initial selection of the specific views to be tested within the Townscape, Visual and Heritage Assessment. Mindful of the complexity and array of the assets and landscapes affected, we do not consider that the existing views as submitted adequately demonstrate or test the likely impact of the proposed scheme upon the historic environment. This is particularly evident with regard to Chiswick House and gardens.

Notwithstanding concerns over the adequacy of the submitted viewpoints, we note a more general concern with the applicant's assessment methodology, in terms of the assessment of the effects of the development. Throughout the Townscape, Heritage and Visual Impact Assessment report, wherever it is recognised that the proposals would lead a degree of change (be it 'high', 'medium' or 'low') the resulting effects are presented as being beneficial due to the 'architectural qualities' of the development. This fails to account for the individual aspects of setting of the many heritage assets affected and gives no cognisance as to whether appearance of prominent new urban form might be contrary to the more rural and open settings of the parklands and



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riverscapes affected.

With regard to the methodology employed in assessing the impact on the WHS, we note the TVHIA report uses the methodology in the GLA's SPG on London's World Heritage Sites - Guidance on Setting (2012). This SPG draws on the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Sites. The assessment briefly considers a summary of the OUV of the Kew World Heritage Site. It correctly identifies the two attributes that are most likely to be affected as the historic cultural landscape and the iconic architectural legacy. However, it is very brief, and does not go into sufficient detail about what the attributes consist of, the detailed character of the site and many of the numerous elements of the gardens that contribute to these, despite the management plan providing detailed evidence of this. Much of the report focuses on elements that are of lesser relevance given the location and impacts of the proposal. There is a repeated emphasis to the distance of the development from the World Heritage Site. Whilst in some circumstances, the relative distance of a development may be considered to reduce visual impact, given the height of the proposed building and the sensitivity of the assets and landscapes affected, the mitigation in this context is considered to be marginal.

More generally, the TVHIA employs an EIA approach to the assessment of impacts, focusing on Townscape and Built Heritage. While it makes reference to the ICOMOS guidance, it overlooks the clear direction in the ICOMOS guidance that an EIA approach is often insufficient for the assessment of Cultural World Heritage. The assessment consistently focuses on specific views chosen by the consultant, rather than focusing on attributes of the OUV set out in the Management Plan. It is our view that, had the OUV and its attributes been correctly taken as the starting point for the analysis, the conclusions would have been different.

The assessment does not consider the evaluation of the attributes as set out in detail in the Management Plan. The evaluation of the attributes in the Management Plan (section 3.9) contains elements that are directly relevant to understanding the impact of these proposals on the OUV. The failure to address these adequately represents a serious omission in the methodology. This can be seen by the absence of analysis of the impact of the proposals on elements of the designed landscape other than buildings. This is despite many of the landscape designers being of international historic significance. For example, the document does not consider the impact of the proposed tall building appearing behind certain groups of trees.

The WHS Management Plan notes in relation to the Victorian garden lay-out, when Hooker (Director), Nesfield (landscape architect) and Burton (architect) unified the two former royal gardens in a coherent landscape scheme in the 1840s that the '*arboretum is occasionally punctuated by clumps of evergreens which contain views and provide a sense of spatial layering and enclosure.*' In several of the selected views, including the one with the Palm house, these evergreen trees appear to screen some of the tower. The harmful impact on the landscape that reducing the historically desired sense of



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enclosure would have by introducing elements beyond the site boundaries is not acknowledged.

There is also no consideration given to the significance of the historic arboretum, specific historic trees or different gardens, and the contribution that these and the considered taxonomic layout (whereby the botanical collections were carefully grouped to encourage observation and learning) make to the OUV. This is evident in the view that includes the Orangery, where certain trees are particularly significant to the botanic collection, such as the chestnut-leaved oak. This is among the first of this species planted in the UK, dating from 1846. At over 30 metres tall and 30 metres spread, it is considered to be the biggest, finest and unrivalled specimen of its type in the world. As the largest and fastest-growing tree in the arboretum it has a key place within the collection and the landscape, and has also been selected as a TROBI (Tree Register of the British Isles) champion. Beside this sits Kew's oriental plane, one of five 'Old Lions', which are highly significant as some of the few remaining trees with the oldest actual known planting date of 1762. The ability to appreciate the significance of these trees, and the Orangery beside them would be reduced by the arbitrary appearance of the tower.

The outstanding universal values of the World Heritage Site specifically refer to the landscape design and the iconic architectural legacy of the Royal Botanic Gardens. A particularly important aspect of the many highly graded listed assets within the WHS is their designed landscape setting. Similarly, much of the significance of the grade I registered park & garden comes from the landscape design with its primary and secondary views, with formal and informal elements overlapping. Whilst certain viewpoints may be of particular value within the WHS, the experience of this unique asset is a kinetic one which clearly cannot be distilled to singular viewpoints.

The development will appear as an arbitrary new element on the skyline from within the World Heritage Site from a number of viewpoints. An important kinetic view affected would be of the Grade I listed Orangery as one approaches from the south west. Designed by William Chambers (1761), it is located in a prominent position within the gardens, being sited within the right angle formed by the two sections of the Broad Walk. Built of brick and coated in Chambers' own custom recipe of durable stucco, it is the largest classical style building in the Gardens and is the only surviving plant house in the gardens designed by Chambers.

On approach from the triangular conjunction of paths to the south west, the Orangery emerges into view; framed in conjunction with the grand Chestnut Leaved Oak in the foreground and an expansive and varied tree-lined backdrop. This arboreal backdrop is currently intact to the north and east, with the Haverfield Towers to the North West being largely screened by mature evergreen trees along the west edge of the path. The proposed tall building would appear assertively above the treeline in juxtaposition with the Orangery in this kinetic view. The landscape setting of the Orangery is a



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particularly important part of its special interest, given its symbiotic relationship with the Botanic Gardens. As noted earlier, the mature tree seen in juxtaposition with the Orangery and development scheme (and as shown in View 16) is a Chestnut Leaved Oak planted in 1846 and has been described as the “biggest, finest and unrivalled specimen of its type in the world.”

It is recognised that the skyline to the west of the Orangery has already been partly compromised by the presence of the Haverfield Estate towers. In their report to UNESCO, when the site was being considered for inscription, ICOMOS International reported that the towers in the Haverfield Estate seriously diminished the visual experience at Kew. It is our view the proposed scheme would further exacerbate and contribute to that harm.

It is also noted that the scheme would be seen in conjunction with views of Kew Palace (SAM and Grade I listed building). Whilst these would be oblique views they would be from within close proximity to the Palace and from a vantage point not currently affected by other tall buildings. The verdant garden setting of the Palace is an important part of its significance and was a key reason for it becoming a favourite Royal retreat. The presence of the tall building would impose an unwelcome urban context, eroding from the ability to appreciate the parkland setting of the Palace.

The proposed development would also appear as a prominent new urban element on the skyline of the Kew Green conservation area which forms part of the buffer zone of the Kew World Heritage Site. Whilst the Haverfield Estate tower blocks towards the north-west are already clearly visible on the skyline, these are considered to have a negative effect on the special character and appearance of the conservation area; undermining the intimacy and integrity of the historic village green. The views to the north and north-east of the Green currently remain largely uncompromised by such development.

The village green setting of the numerous individual listed buildings of Kew Green, particularly those along the northern edge, clearly contributes a key aspect of their significance. The aesthetic appeal of the buildings is drawn from their communal domestic and varied character and their relationship to the Green. The modest scale and appearance of these buildings is particularly vulnerable to harm arising from development of greater height and visual prominence within their setting.

The distinctive village green setting of Kew Green lies at the very heart of the special character and appearance of the area. The proposed development would intrude into key views as an incongruous disruptive feature on the skyline resulting in substantial harm to the special character and appearance of this conservation area.

The development would also appear as a prominent and incongruous new element on the skyline in important views of the Strand on the Green conservation area. This





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conservation area contains many individually listed buildings, including the Grade II\* Zoffany House. Those located along the river frontage clearly derive significance from their riverine setting. The development would result in a distinct and dominant intrusion on the skyline and would be a harmful addition to what are largely unspoilt views. The tranquil riverine setting goes to the very heart of the special character and appearance of Stand on the Green and it is considered that the development would cause substantial harm to this conservation area.

The development would also appear visible as a new urban element within the treeline in key views south from the Terrace of Gunnersbury Park. This would detract from the currently uncompromised view of the landscape currently seen from this terrace and would erode the intended primacy of the built elements within it, such as the Grade II\* listed Conservatory.

As set out in Government policy, great weight should be given to the conservation of designated heritage assets, and **any harm** [my emphasis] to their significance requires clear and convincing justification (NPPF paragraph 132). The justification we have seen so far for the harm caused appears to rest on urban design theory and the, not yet formalised, local planning policies for the 'Golden Mile'. We do not accept that the pursuit of good urban design justifies harm to established context of a distinctive and highly valued character. We are also not convinced that such harm is necessary to regenerate the site successfully and bring about wider public benefits. The proposals therefore do not accord with Government policy as set out in the NPPF.

We consider that the proposals are contrary to the 1990 Act, which requires the local planning authority to have special regard to the desirability of preserving the settings of listed buildings (Section 66) and of preserving or enhancing the character or appearance of a conservation area (Section 72). The proposals would also be in conflict with London Plan Policy (7.10B) regarding World Heritage Sites which states development should not compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance.

### Recommendation

For the reasons which have been outlined above, Historic England considers that the proposals would result in substantial harm to the special character and appearance of the Kew Green and the Strand on the Green conservation areas. Furthermore, it is considered there would be appreciable adverse harm to the OUV of the Kew World Heritage Site (and the significance of the Grade I listed buildings of Kew Palace and the Orangery therein) and harm to the Grade II\* registered Gunnersbury Park.

The proposals are not considered to meet the criteria of sustainable development. In light of the clear conflict with statute and policy, we object to the proposals and recommend planning permission is refused. The cumulative levels of harm identified combined with the significance of the heritage assets affected means that the





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proposals raise issues of more than local significance. In that regard, should the London Borough of Hounslow be minded to grant permission Historic England will request that the Secretary of State call-in the application for his own determination.

Please contact me if we can be of further assistance. We would be grateful to receive a copy of the decision notice in due course. This will help us to monitor actions related to changes to historic places.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

Yours sincerely

**Marek Drewicz**

Inspector of Historic Buildings and Areas

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cc: Mr David Holroyd - Royal Botanic Gardens Kew

Mr Jon Barnes - HRP

Mr Tom Horne - DP9



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