

Environment Department
Development Control
London Borough of Hounslow
Civic Centre
Lampton Road
Hounslow TW3 4DN

For the attention of Sarah Scannell

09 February 2016

System reference: P/2015/5555
Planning reference: 00505/EY/P18

Dear Sirs,

LAND AT CHISWICK ROUNDABOUT GREAT WEST ROAD LONDON W4

We refer to this application for full planning permission for a 32 storey building comprising 320 residential units (Use Class C3), office (Use Class B1), retail/restaurant uses (Use Class A1-A3), basement car and bicycle parking, resident amenities etc.

We wish to object to this application due to the substantial harm the proposed building will cause to attributes contributing to Kew's Outstanding Universal Value (OUV) as set out in our World Heritage Site Management Plan, namely:

- i) Kew's rich and diverse historic cultural landscape, and
- ii) Kew's iconic architectural legacy, in particular Kew Palace and the Orangery.

We also object to harm the proposed building would cause to the setting of the World Heritage Site, particularly views from Kew Green.

The proposal is contrary to Local Plan (adopted September 2015) policy CC3 on tall buildings, in particular paragraphs c), d), f), g), h), i), j), l), and p).

The proposal is also contrary to policy CC4 on heritage, in particular paragraph d), which refers to: "*working ... to conserve and enhance the outstanding universal values of The Royal Botanic 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*". Similarly paragraph q).

Additionally Policy SV1 requires the Council to undertake a partial Local Plan review. Paragraph g) states that the council will: "*... identify sites with suitability for tall buildings following further urban design work*". This work is just commenced and will take a further two years. Interim measures for determining planning applications have yet to be established. So the proposal lacks a proper framework against which it can be assessed.

Attributes of the rich and diverse historic landscape

Relationship with the River Thames and wider Arcadian landscape beyond

Paragraph 3.9.7 of the WHS Management Plan describes the relationship of Kew Gardens to the wider natural and designed landscape of the River Thames. The Visual Impact Assessment shows that the proposed building would have a significant impact on this landscape.



The proposed building is prominent from Brentford Dock and the River Brent junction, as View 24 shows. Views of the proposed building from further upstream are absent. Sight lines and views from the river end of Syon Vista and from the Syon bank indicated at Figure 12 on page 81 of the WHS Management Plan should be included.

Victorian garden lay-out

Paragraph 3.9.11 of the WHS Management Plan describes the predominantly Victorian arrangement of Kew, resulting from a collaboration of Hooker, Nesfield and Burton from the 1840s onwards unifying the two former royal gardens into a single coherent landscape. Buildings within this landscape - Victorian or earlier - are intended to be seen, either as focal points of views and vistas, or as revealed moving through the landscape.

The arbitrary appearance of more recent buildings, e.g. the 1970s Haverfield towers, has been harmful in this designed landscape.

The proposed building will be a further arbitrary intrusion into this otherwise complete and unified scene, visible from various points within Kew Gardens either above the tree line or as a substantial presence within the tree screen, particularly in winter. For example View 20 shows the proposed building from across Palm House Pond in relation to the Princess of Wales Conservatory. The assertion that the magnitude of change in this view is "close to nil" is simply not true.

Remaining aspects of William Chambers 'Anglo-Chinese' garden style

The view northwards over the lawn or along the Broadwalk towards Kew Palace and the Orangery recalls the open space of Sir William Chambers' 1760s design for Kew Gardens. Further tall buildings appearing above the tree line behind these key buildings will be exceptionally damaging, as View 16 looking towards the Orangery confirms.

The remaining aspects of the Capability Brown landscape

This is partly dealt with above in relation to the Arcadian landscape. The proposed building is likely to impact upon the remaining aspects of the Brown landscape both on the Kew and Syon banks due to its high visibility along the river. This area is unique for having Capability Brown landscapes on both sides of the river.

GLA guidance on the settings of London World Heritage sites contains criteria and methodology (in Appendix 4) for assessing the magnitude of impacts of proposals in sensitive areas such as this. This methodology should be applied in this case.

Attributes of Kew's iconic architectural legacy

The Orangery

The proposed building is prominent in relation to the Orangery, seen in its immediate backdrop. The Orangery is part of the unique collection of glasshouses at Kew, being an example of an early (pre-Victorian) glasshouse. The Orangery is also a part of the Hooker/Nesfield/Burton arrangement, intended to be seen in the designed landscape. The Orangery sits within the treescape of Kew, whereas the proposed building breaks the treeline, as View 16 of the Visual Impact Assessment shows.

Kew Palace and adjacent buildings

The proposed building will also be seen in relation to Kew Palace. A recent walkabout confirmed the visual impact beside Kew Palace looking east, as View 32. The building is likely to be more prominent from the garden in front of Kew Palace - the main public approach - although there is no view taken from this point. This should be included.

Harm to the setting of the Kew WHS

The proposed building will also have a significant impact on views from Kew Green, the principal approach and entrance to Kew Gardens, and a Conservation Area.

View 21 shows the proposed building projecting above the north terrace of Kew Green and the tree canopy. This scene is complete and does not require major new additions. We cannot therefore agree with the comment to View 21

in the design & access statement which describes the proposed building as a “*gentle companion to the existing group of buildings*”.

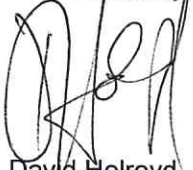
As with previous applications we have seen (e.g. Brentford Stadium) the long focal length used does not convey the severity of the impact of the proposed building.

Conclusion

We understand the Council's regeneration objectives for Brentford and have never sought to frustrate these. But we feel that the Council has not reciprocated by properly considering the wider impact of development proposals, particularly on Kew.

UNESCO has previously criticised the impact of the Haverfield Towers on Kew. The proposed building raises the possibility of Kew being added to the list of World Heritage in Danger. In the circumstances, the best course would be for the developer to withdraw the application.

Yours faithfully,



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