

Mr. Stephen Hissett
Regeneration, Economic Development and Environment Department
Development Management
London Borough of Hounslow
Civic Centre
Lampton Road TW3 4DN

20 September 2017

System Reference: P/2017/3372
Planning Reference: 00607/T/P1

Dear Mr. Hissett,

40 and 40a High Street, Brentford TW8 0DS: Waterman's Art Centre site

I refer to the current planning application for the redevelopment of the site of 40 and 40a Brentford High Street for the replacement of Waterman's Arts Centre and adjacent buildings with five residential blocks rising to eight storeys.

The proposal will be highly prominent seen from Kew. This will particularly be the case looking from Kew Palace and the Queen's Garden northwards, and when looking from the lawn to the south where the proposal will be seen in the immediate backdrop of Kew Palace

The proposal would also have a significant impact on the riverside, where it will breach the currently uninterrupted tree line of Brentford and Lots Aits as seen from the Kew towpath.

The purpose of this letter is therefore to object to this application and to reiterate concerns previously expressed to the applicants' agents at two consultation meetings in August 2016 and July 2017, as confirmed in our subsequent letters.

Given the impact of this there can have been no doubt about our view of this proposal and the harm it would cause to the setting of Kew. It is disappointing that little or no account has been taken of our views.

The proposal would represent a major change to the setting of the World Heritage Site and would cause substantial harm to attributes of OUV. As such it would be contrary to policy CC3 of the Council's Local Plan adopted in September 2015.

The World Heritage Site Management Plan sets out significance of the site and policies for its protection. The proposal would affect several character zones of the WHS particularly the Entrance Zone and the Riverside Zone described at 3.5 of the Management Plan.

Attributes of Outstanding Universal Value affected by the proposed application include the rich and diverse historic cultural landscape and the iconic architectural legacy. These are discussed at 3.8 and 3.9 of the Management Plan.



The protection of views lines outside the WHS is set out as a key issue at section 8 as Issue 8. Sight lines and views are shown at Figure 12. This includes the sight line along the Broad Walk and views out from Kew Palace and across the river. The application will feature very prominently in these view lines.

It is clear therefore that the proposal would result in substantial harm to the setting of Kew Gardens and Kew Palace and to the attributes of OUV of the World Heritage Site.

An assessment framework for gauging the magnitude of impact of proposal and for avoiding or mitigating adverse impacts is provided by the GLA in their Supplementary Planning Guidance on settings of World Heritage Sites in London.

A methodology for determining the scale of change is set out in Appendix 3 of that document. The magnitude of impact is set out in Appendix 4.

The Townscape and Visual Impact Assessment contained within the application documents refers to the GLA guidance in the section on planning policy context, but does not then make use of it in assessing the impact of the application. We would ask for this assessment in accordance with the GLA methodology to be carried out before this application is considered further.

Yours sincerely

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Head of Estates

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cc	Mr. Matthew Cooper	Historic England
	Mr. Mike Dunn	Historic England
	Mr. Adrian Phillips	Historic Royal Palaces