



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

For the attention of Jessie Rotrand, Planning Officer

30 May 2020

Dear Ms Rotrand,

Planning Application: 50 London Road, Brentford, TW8 8AP  
Planning Application ref: P/2020/1361

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.

**In summary, we strongly recommend that this application be rejected as it stands, on three principal grounds:**

- **That the applicant has failed to provide a meaningful analysis of the impact on heritage assets such as Royal Botanic Gardens Kew (a World Heritage Site) and Grade I listed Syon Park and should be required to submit Visual Impact Assessments for these two (#1 below);**
- **That the seven-storey Block A, facing onto the London Road, exceeds the 20m maximum height set out in the Local Plan for this area, and is out of scale with the surrounding low-rise townscape to the west and north (#2 - #4 below);**
- **That the scale of the development has a significantly adverse impact on the Grade II listed, two-storey building at 69 London Road, which is 32 metres across the road (#5 below);**

**In addition, we support the objections made by Brentford Voice on additional grounds (#6 below)**

**(1)** The applicant's analysis of the development's impact on the **Royal Botanic Gardens Kew** ('RBG Kew') World Heritage Site is, in our view, superficial and lacking in rigour. The Planning Statement does mention RBG Kew [5.71-5.73) but in a cursory way. There is no reference to specific vistas and they have not prepared a Visual Impact Assessment, merely generalised qualitative statements:

**5.72** *Given that the Site is not within the 'buffer zone' of the Royal Botanical Gardens Kew World Heritage Site, and the distance the Site is from the Royal Botanical Gardens at Kew, the amount of existing development between these respective sites, and the relative height of the Proposed Development, there is not considered to be any material impact on the Outstanding Universal Value, integrity, or authenticity of the Royal Botanic Gardens, Kew World Heritage Site.*

**5.73** *Therefore, the Proposed Development would 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 of their attributes of the Royal Botanical Gardens Kew World Heritage Site. In particular, the Proposed Development would not compromise the ability to appreciate Kew's Outstanding Universal Value, therefore the Proposed Development would be in accordance with adopted London Plan Policy 7.10, New London Plan Policy HC2, and Local Plan Policy CC4.*



Their conclusion (5.54) is that 'the views and CGIs contained within the Design and Access Statement, prepared by Marek Wojciechowski Architects, clearly demonstrated that the Proposed Development would not have an unduly detrimental impact on these surrounding heritage assets. The impact (or lack of impact) on surrounding heritage assets, is covered in more detail later in this Section of the Planning Statement.'

We take issue with several of these claims: firstly, the 'view and CGIs contained within the Design and Access Statement' are virtually non-existent: there is no analysis and certainly no 'clear demonstration' of the lack of 'an unduly detrimental impact on these surrounding heritage assets'. Secondly, the claim that the lack of impact 'on surrounding heritage assets is covered in more detail later in this Section' is, in our view, inaccurate: there is no such comprehensive coverage.

**We recommend strongly that the applicant be required to provide a comprehensive Visual Impact Assessment**, as has been provided in many applications to London Borough of Hounslow for tall buildings (for example in the east of the borough, the 'Golden Mile'). The only vista from RBG Kew appearing in the application is in the form of an arrow (the direction of the 'Cedar Vista') in a small diagram on page 17 of the Design and Access Statement - with no written comment or analysis.

RBG Kew have themselves submitted a request to London Borough of Hounslow to require the applicant to provide a verified view from the end of the Gardens' **Syon Vista** - recognised as of particularly importance - looking across to Syon House. This would allow a proper evaluation of the impact of the development on the Kew Gardens. **We support this request.**

We note that RBG Kew commented as follows in relation to the Syon Vista in their submission to the Draft New London Plan consultation: 'The view from the end of Syon Vista in Kew Gardens towards Syon House is a river prospect within the "Arcadian Thames". **The view is of exceptional sensitivity**, offering an uninterrupted treeline, except for the Brentford towers in the distance downstream. Syon Park was laid out by Capability Brown in the 1760s and there are also remnants of the gardens designed by Brown on the Kew side. The landscape here is unique in that there are Brown landscapes on both sides of the river. These views are both referred to in the Kew World Heritage Site Management Plan. We feel there is a good case for these to be given further protection within the London Plan'. **We believe this vista should have been given specific consideration in the applicant's Planning Statement or Design and Access Statement.**

**A similar Assessment should, we recommend, be prepared by the applicant for the impact on the nearby Grade-1 listed Syon Park.** There is no meaningful analysis of the impact of the development on Syon Park, notwithstanding comment to the contrary in 5.62: 'The potential impact of the Proposed Development on the following heritage assets **has been considered as part of this application**: Syon Park (Grade I) (and Historic Park and Garden).'

**(2)** The building to be demolished - a two-storey Royal Mail Delivery Office - is not listed and the site is just outside a conservation area. However, Block A, fronting the London Road, reaches a height (23.5 metres) which is above the 20 metre maximum specified in London Borough of Hounslow's Local Plan for this area of Hounslow: The relevant section (CC3 (e)) highlights a policy, outside a prescribed area not comprising the site, of '**preserving the predominantly 2 to 3 storey (less than 10 metres) building heights across the borough with some limited scope for 4 to 6 storey (up to 20 metres) buildings/elements along main streets (for example London Road)**, to assist with way-finding and where the opportunity exists for higher density development.'

**Thus the proposed building contravenes the Hounslow Local Plan, and should be one of the grounds for refusal of the application.**



(3) The applicant's Planning Statement recognises this contravention: it justifies this by arguing that the site is in a 'transition location': "The Site is situated within a largely 20th Century vernacular context, with the surrounding area developing very rapidly in the middle of the 20th Century. The building stock is predominately residential with a number of large scale warehouses in close proximity. The Site sits on the edge of the town centre, with the surrounding context consisting of residential properties and large format retail and industrial warehouses. ***In order to bridge between these two characteristics, and respond to the requirements of Local Plan Policies CC1 and CC2, the Proposed Development must mediate between these contrasting scales.***"

This attempt to justify a planning contravention by arguing that this is a 'transition location' is, in our view, invalid. The fact is that this 23.5 metre storey building **would set an unwelcome precedent in extending westwards the line of very tall buildings along London Road**, in a setting of predominantly two-storey buildings to the west and low rise industrial buildings to the north.

In addition, we take issue with the applicant's statement that 'the Proposed Development **must** mediate between these contrasting scales'. The use of the prescriptive word 'must' implies that the applicant is effectively seeking to overturn local planning policy, substituting its own.

(4) As mentioned in (1) above, the Planning Statement does state: 'Local Plan Policy CC3 (Tall buildings) would classify the Proposed Development as a 'tall building' as the Site is outside Brentford Town Centre, and it extends above 6 storeys or 20 metres above the ground. ***Although the Proposed Development would extend above this threshold, it is considered that it would still generally comply with the intent of this policy***, as due to the unique characteristics of the Site, an opportunity is created for a 'tall', high density development along a main street, that would assist with wayfinding, and the transition of height up towards Brentford Town Centre."

Again, arguing that the contravention of Hounslow's Local Plan does actually 'comply with the intent of this policy' is, in our view, unacceptable. **We recommend that the maximum height be reduced to within the 20 metre maximum stipulated by the Local Plan.**

(5) The Planning Statement states that 'the Proposed Development is not considered to result in any significant harm to the historical significance of the building contained within the listing description, ***nor is the Proposed Development likely to have a significant impact on the setting of [the listed] 69 London Road due to the distance between the two properties. While the Proposed Development would result in a substantial building within the setting of the 69 London Road, and its attached wall, it is considered that due to the high quality design of the Proposed Development, and its disposition in relation to the listed building, this causes less than substantial harm to the character and setting of this Grade II listed building.*** The substantial public benefits of the Proposed Development should therefore be weighed against the potential harm in accordance with Paragraph 196 of the NPPF, and this will be covered later in this Section of the Planning Statement..!'

The distance between 50 London Road and the listed building at 69 London Road (across the London Road) is around 32 metres, so this 23.5 metre tall building would most certainly have a substantial, negative impact on the setting of this two-storey, Grade II listed building. We note #194 of the NPPF: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification". We do not believe such justification has been provided.

(6) In addition, we would like to support the comments of Brentford Voice in relation to a number of other grounds on which we believe the application fails to adhere to the London Borough of Hounslow's planning guidelines:



- The proportion of affordable housing proposed is substantially below the borough-wide target of 40%, and the tenure splits defined in Local Plan Policies SC2 and SC3.
- The provision of amenity space does not meet the standards laid out in Local Plan Policy SC5 (paras. 24-26)

We would be grateful if you would acknowledge receipt of this letter to [planning@kewsociety.org](mailto:planning@kewsociety.org).

Yours Sincerely,

John Ricketts  
Planning Trustee  
The Kew Society