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Mr Shane Baker
London Borough of Hounslow
The Civic Centre
Lampton Road
Hounslow
TW3 4DN

Direct Dial: 020 7973 3802

Our ref: P00543521

12 January 2017

Dear Mr Baker

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015
1-4 CAPITAL INTERCHANGE WAY BRENTFORD LONDON TW8 0EX
Application No 01508/1-4/P6**

Thank you for your letter of 20 December 2016 notifying Historic England of the above application. The application has been presented for an internal review by the London Office, and the following advice provided therefore represents the corporate view of Historic England following that consideration.

The review panel concluded that the proposals raise serious concerns in terms of the potential impact upon the historic environment. As such, Historic England will be seeking the views of the London Advisory Committee at their next meeting on the 4th of February, shortly following which we will be able to issue additional comments. The applicants will be invited to present their scheme to the Committee. For more information on the London Advisory Committee please see:

<https://historicengland.org.uk/about/who-we-are/committees-and-panels/london-advisory-committee>

Summary

The proposals are for the demolition of the existing warehouse/storage buildings on the site and redevelopment to include three new tall buildings of 18, 19 and 20 storeys. Historic England considers that the proposals would result in a serious adverse impact upon the historic environment, in particular to the special character and appearance of the Strand on the Green conservation area.

Historic England Advice

The development site at 1-4 Capital Interchange Way is located immediately to the south of the Great West Road and approximately 200m to the west of the Chiswick Roundabout. There are no heritage assets on the existing site. However, given the scale of the development, there are a number of designated heritage assets potentially affected by the proposals including the Kew World Heritage Site (& conservation area);



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The Orangery (grade I listed); Strand on the Green (conservation area); Kew Green (conservation area); and Gunnersbury Park (grade II* registered park & including the grade II* listed Conservatory).

We note that the development site is in close proximity to the site of a current live planning application for the 'Chiswick Curve' which is a tall building proposal upon which Historic England has recently provided advice to LB Hounslow and which raises many similar issues in terms of likely impacts upon the historic environment.

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.

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.

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 Conservatory. 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



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(both C18). Indeed, some of the landscaping could date from the early years of Princess Amelia's occupation, with the terrace, south lawn, Conservatory 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 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.

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. 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 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



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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.

Impact of the Proposals

The proposals are for the demolition of the existing warehouse/storage buildings and redevelopment of the site to include three new tall buildings of 18, 19 and 20 storeys. The development would be prominently visible in riverine views of the Strand on the Green conservation area. There would also be visibility from within Gunnersbury Park (including the Kensington Cemetery); the Kew Green conservation area and from some viewpoints within the Kew World Heritage Site.

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 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



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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.

London Plan (2011)

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'.

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

Local Planning Policy Context

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



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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 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 Position

The development proposals include three new buildings which, at 18, 19 and 20 storeys, are considerably taller than the prevailing massing of buildings in the wider area and will be highly visible from a large number of viewing points. Although tall in height, the design of the buildings has adopted a generally curvilinear form with a squat massing. Where the building's overlap in key views, they take on an amorphous form which adds to the perceived sense of bulk.

In our view, the main impact to the historic environment would be upon important riverine views of the Strand on the Green conservation area. Here, the new development would appear as a trio of prominent and incongruous new buildings; clearly sitting at odds with the lower scaled and finely grained historic buildings of domestic character which largely comprise the character and appearance of that conservation area.

The development would also intrude arbitrarily above the treeline in views from the terrace of the grade II* registered Gunnersbury Park (also a conservation area). As seen in the visualisations, this view is currently uncompromised. The listed mansion and conservatory's rural parkland setting would be eroded by the appearance of the new development. Further to the south, within the same conservation area, the buildings would appear dominantly behind the sombre Katyn War Memorial in views from within the cemetery. Though not listed, the memorial could be considered a non-designated heritage asset making a positive contribution to the special character and appearance of the conservation area.



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The development would similarly intrude arbitrarily above the treeline in key views from within the Kew Green conservation area; introducing a massing and materiality which is clearly at odds with the general materiality, scale and grain of this quintessential and important historic village green.

The development would appear visible as an arbitrary element above the roofline in views of the grade I listed Orangery by William Chambers within the Royal Botanic Gardens World Heritage site. This would be to the detriment of the parkland setting of the listed building.

Recommendation

In our view the proposals would clearly result in serious harm to a range of designated heritage assets, through alteration of their setting, resulting in their significance being reduced. The scheme will be presented to the London Advisory Committee at their meeting of 4th February, shortly following which HE will be in a position to offer further detail on our corporate view of the impacts of the development.

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted.

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

E-mail: Marek.Drewicz@HistoricEngland.org.uk

Cc – David Taylor (Montagu Evans)



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