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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

23 February 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.

Summary

Historic England wrote to you on the 12th of January providing our detailed advice on the above application. As mentioned at that time, given the degree of potential impacts of the proposals upon the historic environment, the application was put forward for consideration by the London Advisory Committee (LAC), who received a presentation upon the proposals from the applicants on 31 January. The following supplementary advice is informed by the committee's assessment. Further information on the Committee may be found at: <https://historicengland.org.uk/about/who-we-are/committees-and-panels/london-advisory-committee/>

Historic England Advice

In our letter of 12 January 2017, Historic England advised the Council that there would be a number of designated heritage assets adversely affected by the proposed development and that the greatest impact would be to the Strand on the Green Conservation Area (a designated heritage asset).

When considering the impact of a proposed development on the significance of a designated heritage asset, the NPPF (para 132) is clear that "*great weight*" should be given to the asset's conservation and that "*the more important the asset, the greater the weight should be*".

Relative to London's c.1000 conservation areas, Historic England considers the Strand on the Green Conservation Area to be of the highest significance; due to its degree of rarity and intactness; the quality and special interest of the individual buildings located within it; and the strength of its historic and aesthetic values. As such, it is particularly



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sensitive to change.

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). The conservation area contains approximately 48 listed buildings. 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 the rural character of its tranquil riverine setting and the advantageous views from the south side of the river.

The conservation area comprises 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, including Zoffany House which is listed at grade II*. The largely consistent scale of the buildings and their halcyon riverside 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.

Within the wider London context, Strand on the Green presents a relatively rare but coherent and distinct form of a historic character area; the closest synergies being with parts of the riverine conservation area of 'Lower Mall' in LB Hammersmith & Fulham (which adjoins the 'Old Chiswick' conservation area in LB Hounslow). Also comparable are parts of the Barnes Green conservation area in LB Richmond upon Thames.

Historic England considers that the linear riverine setting of the Strand on the Green conservation area is central to its significance. Furthermore, the views of the conservation area from the public footpath along the south bank (and indeed from the Thames itself) are the most advantageous locations for understanding and appreciating that setting.

As shown in TVIA views 26 and 11, the proposed development would appear dominantly and incongruously above the skyline in the most important views of the conservation area. The scale, massing, materiality and detailed design of the buildings appear to make no demonstrable concession to their wider historic context and stand in absolute antithesis to the pattern and character of the existing buildings which define the special character and appearance of the conservation area. As such the new development would have an overbearing and dominant appearance; permanently altering the defining quality of Strand on the Green and also compromising the individual settings of the riverfront listed buildings within it.

Historic England recognises that the consented scheme at the Lionel Road South site will result in some new development coming forward within the setting of Strand on the Green, which will also be in contrast to its prevailing historic scale and grain, albeit lower in scale and more distant than these proposals.



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The visual impact of the consented Lionel Road South scheme is partially mitigated by tree cover and, being further south, does not appear above the historic core of the conservation area (from the riverfront buildings starting with the Bell and Crown at nos 71-75) in key views. Nevertheless, in our opinion, that scheme will also have an adverse impact on the setting of the conservation area, causing harm to its significance. We also note it is unclear as to whether TVIA view 26 was tested at the time of the proposals for that scheme.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it an overarching statutory duty for Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

Similarly, under Section 66, Local Authorities are required to have special regard to the desirability of preserving the setting of a listed building.

The preservation of setting of designated heritage assets is to be treated as a desired or sought-after objective, and considerable importance and weight is attached to the desirability of preserving setting when weighing this factor in any balancing exercise.

The National Planning Policy Framework (2012) provides guidance on the fulfilment of the statutory duties. Paragraph 132 of the Framework states that Local Authorities should put great weight on the conservation of heritage assets and recognises that the significance of an asset can be harmed by development within its setting.

Paragraphs 133 and 134 of the Framework set out the tests applied to any harm, whether substantial or less-than-substantial, to designated heritage assets that must be met if that harm is to be justified.

The Planning Practice Guidance (PPG) states that it will be a judgement for the decision taker as to whether a proposal causes substantial or less-than-substantial harm. It advises that substantial harm is a high test, so it may not arise in many cases. With regard to determining whether substantial harm would be caused to listed buildings, it suggests an important consideration would be whether the “*adverse impact seriously affects a key element of its special architectural or historic interest*” (our emphasis). It is also made clear that harm may arise from development within the asset’s setting. It is also stated that “*even minor works have the potential to cause substantial harm*”.

With regard to assessing harm to conservation areas, the PPG provides an example whereby if “*the building is important or integral to the character or appearance of the conservation area then its demolition is more likely to amount to substantial harm to the conservation area, engaging the tests in paragraph 133 of the National Planning*



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Policy Framework."

Historic England considers that the contribution made by setting to the significance of the Strand on the Green conservation area is very high, and that the setting is a key element of its special character and appearance which is integral to its significance. This setting is best appreciated from a specific and limited array of vantage points which comprises a kinetic view on approaching the conservation area from the grade II listed railway bridge to the South, either on the riverfront footpath or from the Thames itself.

In our view, the setting aspect affected by this proposal is a key element of this important conservation area's special interest. The extent of the adverse impact would be serious. Being mindful of the advice contained within the PPG, we are of the view it is substantial harm. It is certainly equivalent to the impact arising from the loss of a building considered important or integral to its character or appearance.

Paragraph 133 of the NPPF is clear that where a proposal will lead to substantial harm, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm is necessary (our emphasis) to achieve substantial public benefits that outweigh that harm or loss.

Recommendation

The Council will need to be clearly convinced that the extent of any public benefits arising from the proposals are so substantial as to outweigh the substantial harm to the conservation area and, moreover, that those public benefits could not be delivered in a way which would be less harmful to the historic environment - eg through a lower height scheme, or through development of an alternative site or sites.

In light of the high importance of the Strand on the Green conservation area to London, the adverse impacts to the various other heritage assets as identified in our earlier advice letter dated 12 January 2017, the cumulative levels of harm identified and the significance of the heritage assets affected, we believe the proposals raise issues of more than local significance. Should the London Borough of Hounslow be minded to grant permission, Historic England will give consideration to requesting the Secretary of State to '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).



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Yours sincerely

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Inspector of Historic Buildings and Areas

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cc - David Taylor (Montagu Evans)



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