

**Place Division / Development Management**

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London Borough Of Hounslow  
Development Management  
Hounslow House, 7 Bath Road  
Hounslow  
TW3 3EB

Letter Printed 18 December 2024

**FOR RECOMMENDATION DATED**  
18 December 2024

**The Town and Country Planning Act 1990, (as amended)**  
**Consultation - Objection**

**Application:** 24/2825/CON  
**Your ref:** P/2023/3208  
**Our ref:** DC/JPH/24/2825/CON/CON  
**Applicant:**  
**Agent:**

**LOCATION**

27-1053 GREAT WEST ROAD, BRENTFORD, TW8 9BW

for

**PROPOSAL**

Redevelopment of the site comprising of demolition of existing buildings and erection of a mixed use scheme comprising 856 homes (Use Class C3); commercial and retail use (Use Class E/B2/B8); plus associated highway and public realm works, landscaping, car and cycle parking, infrastructure and other associated works.

I refer to your consultation regarding the above mentioned proposal.

**My Council's observations are as follows:**

The be advised that the London Borough of Richmond upon Thames objects to the scheme for the reasons detailed in the attached schedule.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R. Angus', with a long horizontal flourish extending to the right.

Robert Angus  
Head of Development Management

# SCHEDULE OF REASONS AND INFORMATIVES FOR CONSULTATION 24/2825/CON

## APPLICANT NAME

Development Management  
Hounslow House, 7 Bath Road  
Hounslow  
TW3 3EB

## AGENT NAME

## LOCATION

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## SUMMARY OF REASONS AND INFORMATIVES

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### REASONS

U0195127	Impact on heritage assets
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### INFORMATIVES

U0096393	Officer Comments
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# DETAILED REASONS AND INFORMATIVES

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## DETAILED REASONS

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### **U0195127**     **Impact on heritage assets**

It is considered that the visual impact of the revised scheme is somewhat reduced as a result of the lower overall height. Nevertheless, the London Borough of Hounslow is to be advised that this Authority (London Borough of Richmond Upon Thames) raises an objection to the proposal, resulting from harm caused to heritage assets and townscape within the London Borough of Richmond in particular:

1. The proposed development would harm the setting and Outstanding Universal Value of The Royal Botanical Gardens, Kew, World Heritage Site, particularly, The Great Lawn and views towards the Orangery (AVR11), The Hive (AVR14), and Kew Palace (AVR17), both individually and cumulatively with other nearby development, contrary to the Great West Road Masterplan, the Royal Botanic Gardens, Kew WHS Management Plan and London Plan Policy H2.
2. The proposed development, cumulatively with other development nearby, would further create an urbanising effect contrary to the 'semi-rural' character of the area as set out in the Conservation Area Appraisal representing a noticeable level of 'less than substantial harm' to the setting of the listed buildings and Kew Green Conservation Area heritage assets.
3. The proposed development would contribute to an increased urbanisation of Chiswick Bridge - Local View (H1.1) in the LBRuT Draft SPD on Local Views.
4. The development would 'solidify' the urban view from Brentford Gate (AVR A01), helping to create the impression of a wall of development and detract from the river landscape.

Informative: The LBRuT would like to be consulted on any CLP/CMP submitted.

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## DETAILED INFORMATIVES

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### **U0096393**     **Officer Comments**

#### Heritage and Townscape

The London Borough of Richmond-upon-Thames (LBRuT) objected to the earlier scheme on this site because it was considered that the information submitted did not make clear the full impact of the proposals and that there would be 'less than substantial' harm to the significance of heritage assets in the borough, particularly Royal Botanic Gardens, Kew World Heritage Site (WHS) and Kew Green Conservation Area. It was thought that the proposals would negatively affect the setting of the WHS as the sense of isolation from the outside world would be spoilt by the intrusion of the towers in the proposed development on the skyline. Similarly, the setting of the listed Kew Palace and Orangery would be negatively affected, as would Kew Green and the listed buildings surrounding it forming part of the Kew Green Conservation Area.

In the revised proposals, Buildings A-D have been reduced by between 1.75 and 20m (1 and 6 storeys) in height, while Building E has been increased by 8.15m (3 storeys). The proposed buildings would range from 60m to 75m in height. There have also been alterations to set back the podium from the building line and to materials, refining and lightening the proposed brick façades. Additional information has been provided, including Additional information has been provided, including addendums to several reports, notably a Design and Access Statement Addendum and Environmental Statement Vol. II: Built Heritage, Townscape and Visual Impact Assessment Addendum.

Overall, it is considered that the visual impact of the revised development is somewhat reduced as a result of the lower overall height. Nevertheless, there is still harm caused

to heritage assets and townscape in LBRuT. For this reason, LBRuT objects to the proposed development.

Of particular concern are the following viewpoints:

Royal Botanical Gardens, Kew, World Heritage Site:

There are still several locations within Kew Gardens where the proposed development would be visible: The Pagoda Vista and Palm House; The Great Lawn and views towards the Orangery (AVR11), The Hive (AVR14), and Kew Palace (AVR17).

The Royal Botanic Gardens, Kew World Heritage Site Management Plan notes that:

The WHS has a very specific set of relationships with its setting, which are an integral part of its design, its experience and therefore of its OUV. Management of change within the wider environs of the WHS is critical to the conservation of OUV. Existing development in the setting of the WHS has already harmed the site's OUV and our ability to appreciate it. Further unsympathetically designed and/or sited development would result in increased cumulative harm.

The Great West Road Masterplan states that it 'has carefully located and modulated tall buildings to avoid causing any additional harm to Kew Botanic Gardens WHS and minimise impact on other heritage assets'. Figure 7.17 gives a maximum height range for this site of 50-60m in height. The revised proposals are at a maximum of 75m in height. The proposals would not be in line with heights given in the Great West Road Masterplan and, consequently, would cause harm to the setting of the WHS.

While reduced, the height of the proposed development would still mean that the building would be visible above the tree line from multiple locations within the WHS. These locations include some of the most sensitive and important views within the WHS such as the view of the Palm House along the Pagoda vista or of the Orangery. The intrusion of any built form into views from within Kew Gardens would damage its sense of isolation from the outside world which is part of its character and landscape design as noted in the The Royal Botanic Gardens, Kew World Heritage Site Management Plan and Great West Road Masterplan (7.7.3). The experience of Kew Gardens and its Outstanding Universal Value (OUV) would therefore be diminished demonstrably. The setting of the Palm House, Orangery and Kew Palace would also be harmed. These heritage impacts have generally been understated in the Environmental Statement Vol.II.

It is the opinion of LBRuT that the proposed development would harm the setting and OUV of the WHS, both individually and cumulatively with other nearby development, contrary to the Great West Road Masterplan, the Royal Botanic Gardens, Kew WHS Management Plan and London Plan Policy H2.

Kew Green (Listed Buildings and Conservation Area):

The Kew Green Conservation Area Appraisal and Management Plan states that: 'The open view across the Green and proximity to the River make it exceptionally sensitive to tall developments within its setting which could harm the ability to appreciate its domestic scale and semi-rural character.' The document also notes as a problem and pressure the 'tall developments outside the borough / across the River Thames, impacting on the setting of the Conservation Area, and listed buildings and other heritage assets within it.'

Paragraphs 9.89 - 9.94 of the Environmental Statement Vol. II: Built Heritage, Townscape and Visual Impact Assessment Addendum conclude that the impact of the proposed development on the significance of listed buildings on Kew Green would be 'very low'. Paragraphs 9.164 - 9.168 concludes that there would be no impact on the Kew Green Conservation Area. The principal reason for these conclusions is the distance between the proposed development and the heritage assets.

Evidently there would be an impact on these heritage assets as the proposed development would be visible from Kew Green and listed buildings. As the development would be located approximately 650m- from Kew Green it would not be distant, but quite prominent given its height. The development would be very noticeable behind the

listed buildings from Kew Green and would represent a noticeable level of 'less than substantial harm' to the setting of these heritage assets.

The proposals would have a similar impact on Kew Green as on the World Heritage Site, intruding on the skyline in views northward from and across Kew Green. The proposed development would be visible in between and above the buildings on the north side of the Green which are mostly 3 or 4 storeys and either listed or non-designated heritage assets. However, because there are longer views across Kew Green and less planting compared to Kew Gardens, the proposed development would be more prominent and have a more harmful affect. The proposed development would also negatively impact the setting of the non-designated heritage assets on the east side of Westerley Ware, Willow Cottages and Thetis Terrace. The proposed development, cumulatively with other development nearby, would further create an urbanising effect contrary to the 'semi-rural' character of the area as set out in the Conservation Area Appraisal.

It is clear that the proposed development would contribute to the ongoing issue of tall buildings negatively impacting the setting of the Kew Green Conservation Area and the adjacent listed buildings. The reduction in height of the revised scheme is not thought to be sufficient to mitigate the harmful impact.

River Thames

Chiswick Bridge:

The view from Chiswick Bridge west along the river is designated as Local View (H1.1) in the LBRuT Draft SPD on Local Views. It is also shown in AVR05 of the Environmental Statement Vol. II. This stretch of the Thames is characterised as 'Arcadian' in the Thames Landscape Strategy and in Richmond Local Plan Policy 18. The proposed development would be visible in the distance from Chiswick Bridge and would contribute to an increased urbanisation of view. In this case, the distance is significant, reducing the level of harm to the view and local character.

Brentford Gate:

The proposed development would also be visible in the view from Brentford Gate (AVR A01) along the river to the northeast. Similarly, the development would 'solidify' the urban view, helping to create the impression of a wall of development and detract from the river landscape.

END OF SCHEDULE OF REASONS AND INFORMATIVES FOR CONSULTATION  
24/2825/CON

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