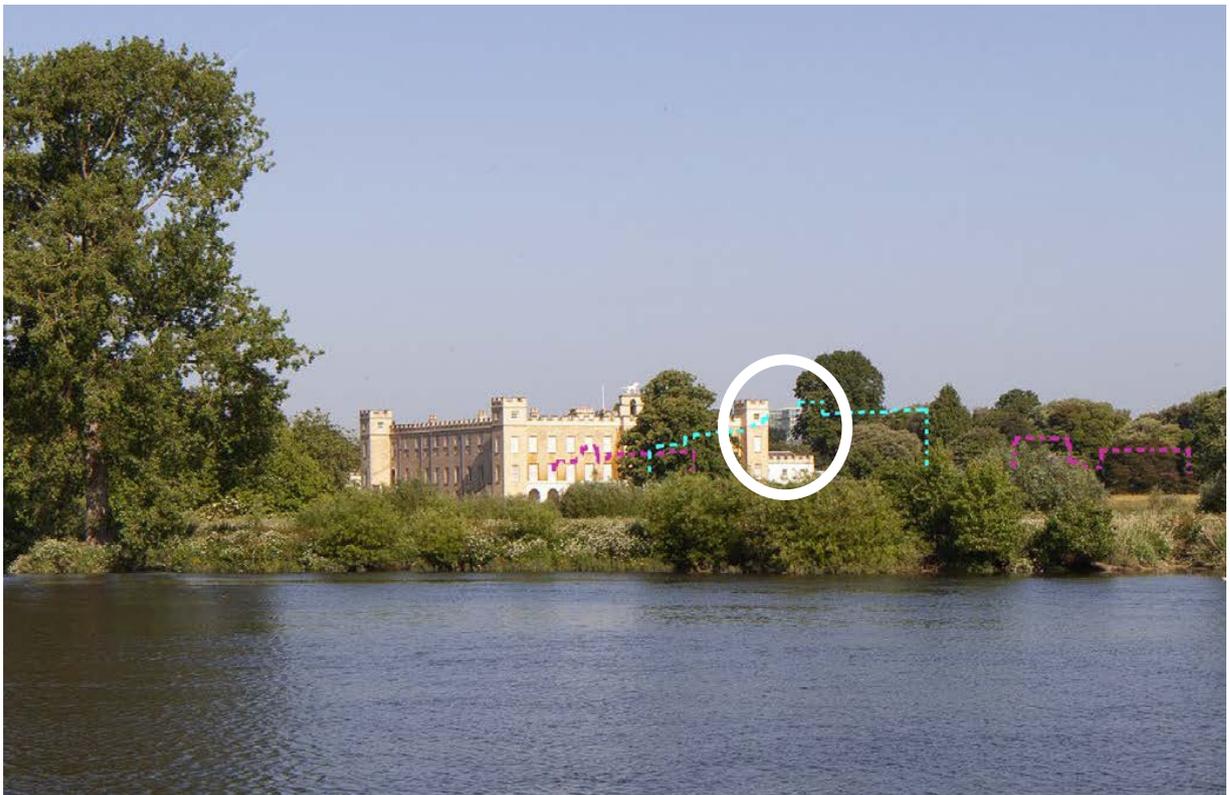


**PROPOSALS FOR HOMEBASE SITE
AT GILLETTE CORNER, HOUNSLOW**

**HISTORIC IMPACT ASSESSMENT
ON SIGNIFICANT HERITAGE ASSETS OF RBG KEW WORLD
HERITAGE SITE AND ITS SETTING**



Visualisation from towpath south-east of Syon House with building appearing to right of Syon House (ringed).
(Based on ARC TVIA Addendum Appendix C)

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25 February 2021

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1 INTRODUCTION

1.1 PURPOSE & SOURCES

This Historic Impact Assessment (HIA) responds to proposals in planning applications in 2020 to build tall residential blocks at Gillette Corner on elevated land by the A4, one mile north-west of the Royal Botanic Gardens, Kew (a World Heritage Site, WHS) and 0.25 miles from Syon Park (a major part of the WHS Buffer Zone).¹ Both sites are included at Grade I on the Register of Parks and Gardens, indicating international significance. Figures 1-3 show the WHS and buffer zone boundaries as well as marking key features addressed below (Figure 2). This analysis has been prepared to identify the significances of the areas associated with the WHS which will be most greatly affected by the proposals, and the magnitude and type of impact which these proposals will have upon these areas.

This HIA provides a detailed and objective assessment which is rigorous in its clearly stated methodology, based on GLA guidance, which itself adapts UNESCO Guidelines and provides a detailed and rigorous assessment methodology.² Although it is aimed at the setting of sites of World Heritage Site significance, the methodology is equally relevant and applicable to the whole historic environment. It is also relevant in this case because it is credibly suggested, in particular by the GLA, that the Arcadian Thames of which this area forms a key element is of World Heritage Status and it is a stated aim of the GLA to work towards achieving this status.³

The GLA method builds on established methodologies including the UNESCO World Heritage Operational Guidelines. The broader guidance in the Historic England Setting Guidance document (2017) is embedded in the GLA approach.

The understanding of the affected features is based on information in the RBG Kew WHS Management Plan 2020-25 (2019) and more detailed analysis in the accompanying report: 'The Royal Botanic Gardens, Kew, The Isleworth Ferry Gate and the Arcadian Landscape (Syon Vista Lawn, The Queen's Cottage Grounds and Syon Park) Historic Analysis & Significance', Dr S Rutherford, February 2021. Figure numbers noted below relate to those in this report. Impacts at particular points have been identified in 'Homebase, Brentford, Environmental Statement September 2020, Townscape and Visual Impact Assessment, Appendix 8.3 Visual Impact Assessment', ARC, and Addendum January 2021. In particular refer to TVIA numbered views 20, 27, 28, 29.

In order to obtain a rigorous assessment of the effects of the proposals, definitions and scales of assessment have been used as set out in Sections 2 and 3.

1.2 IMPACT ASSESSMENT AREA

The impact assessment area comprises those heritage assets related to the RBG Kew WHS landscape which will be the greatest affected by the proposals. Within RBG Kew this focusses on views affecting the Isleworth Ferry Gate flanked by to the north the Syon Vista and Syon Lawn, and to the south the Queen's Cottage grounds. This area within the WHS falls into two of the Character Zones identified in Section 2 the RBG Kew WHS Management Plan 2020-25 (Figure 4, 2019): the north section is in No. 7, the Syon Vista Zone, and the southern section is in No. 6, The South-Western Zone. The Isleworth Ferry Gate and the path leading from it into the gardens form the boundary between these zones. West of RBG Kew areas of the setting affected include the tow path, River Thames, Syon Park

¹ P/2020/3099 (Homebase site, full application) & P/2020/3100 (Tesco site outline application). Full planning application for the demolition of existing building and car park and erection of buildings to provide 473 residential units, a replacement retail food store with additional commercial, business and service space, and a flexible community space, and ancillary plant, access, servicing and car parking (400 customer spaces and 105 residential spaces), landscaping and associated works. Homebase Ltd, Syon Lane, Isleworth TW7 5QE

² GLA London World Heritage Sites Guidance on Settings Supplementary Planning Guidance, Appendices 2-4, Assessment of Significance, Scale of Change & Impact Issued March 2012.

³ See GLA All London Green Grid SPG Chapter 5 and Area Framework 9 Arcadian Thames for GGA9 in which it is a stated aim to work towards achieving World Heritage Status for the Arcadian Thames.

and Mansion, all within the buffer zone, and more distantly the Gillette Tower on the development site.⁴ It should be appreciated that although a buffer zone does not necessarily contribute to the OUV, in this case the Syon Park element of the Kew WHS buffer zone is coincidentally of high significance as essential designed setting, including the unspoilt sky space which contributes to the appreciation of OUV.

1.3 AUTHOR

Sarah Rutherford, Dip. Hort. (Kew), M.A., Ph.D., is an historic environment consultant specializing in designed landscapes. She worked for English Heritage 1996-2003, initially as Historic Parks and Gardens Inspector and then as Head of the *Register of Parks and Gardens of special historic interest in England*. Her MA in landscape conservation from York University is supplemented by a Ph.D. based on pioneering research into the landscapes of Victorian and Edwardian lunatic asylums. As a consultant since 2003 Sarah has prepared conservation plans and other appraisals for a wide range of historic landscapes and buildings. She is the author of several books on aspects of the historic environment including on Humphry Repton and Capability Brown.

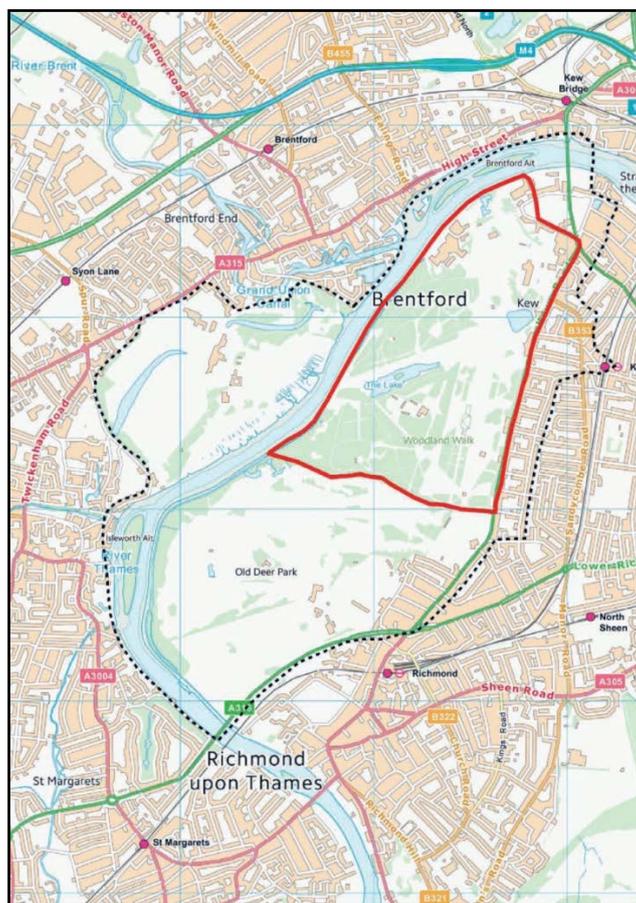


Figure 1 World Heritage Site Boundary and Buffer Zone Boundary Map (RBG Kew WHS Management Plan 2020-25).

The red line indicates the WHS and the dotted black line the Buffer Zone.

⁴ UNESCO *Operational Guidelines for the Implementation of the World Heritage Convention* (2019), para 104 defines a buffer zone as ‘For the purposes of effective protection of the nominated property, a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development in order to give an added layer of protection to the property. This should include the immediate setting of the nominated property, important views and other areas or attributes that are functionally important as a support to the property and its protection.’

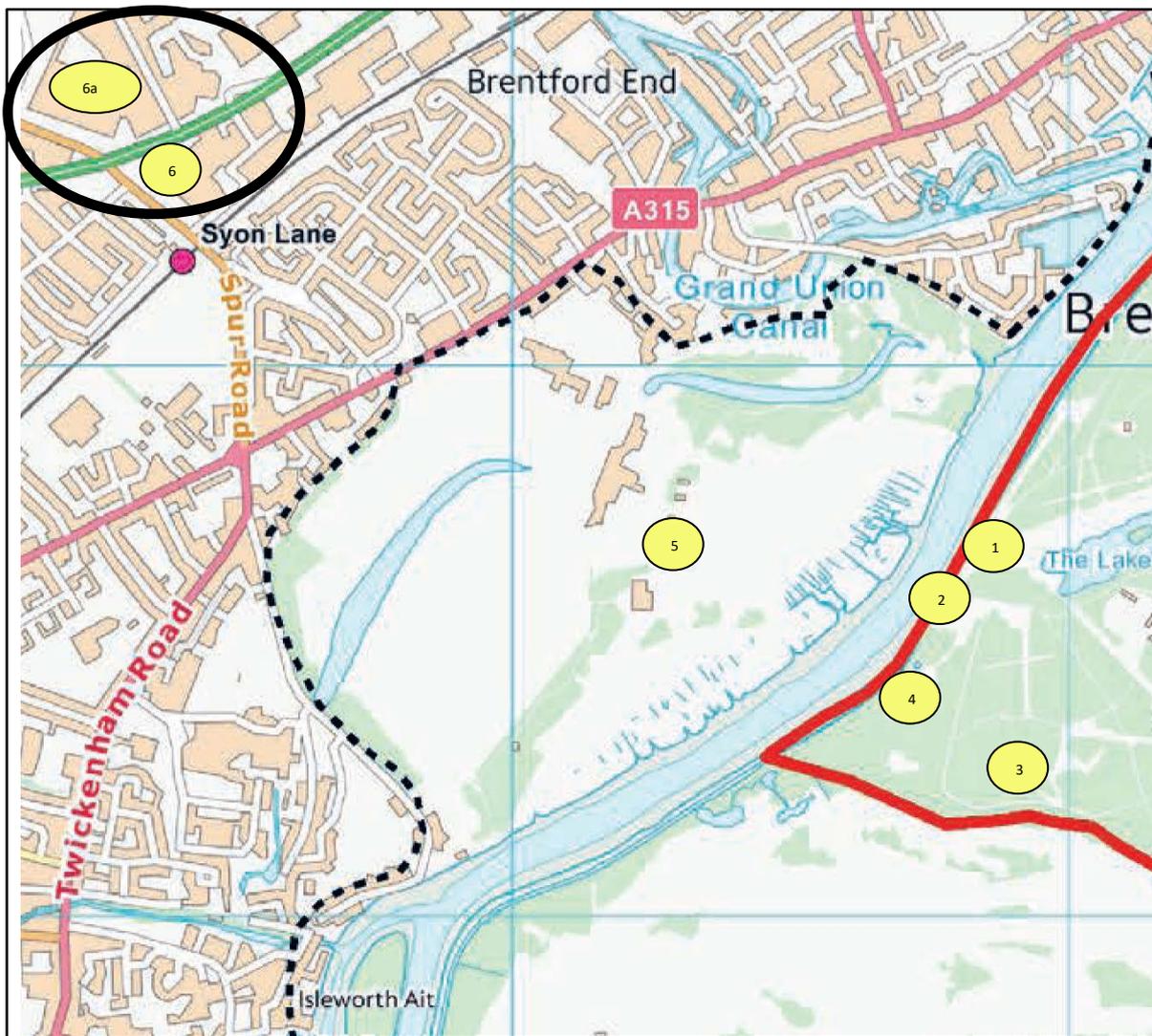


Figure 2 Key Features Map.

1. Syon Vista lawn
2. Isleworth Ferry Gate from Tow Path
3. Queen's Cottage
4. West edge of Queen's Cottage Grounds
5. Syon House set in Syon Park
6. Sites of proposed development of current Tesco and Homebase.
- 6a. Approximate site of the current Gillette tower.



Figure 3 World Heritage Site and Buffer Zone, Aerial Photograph.
Development sites ringed.

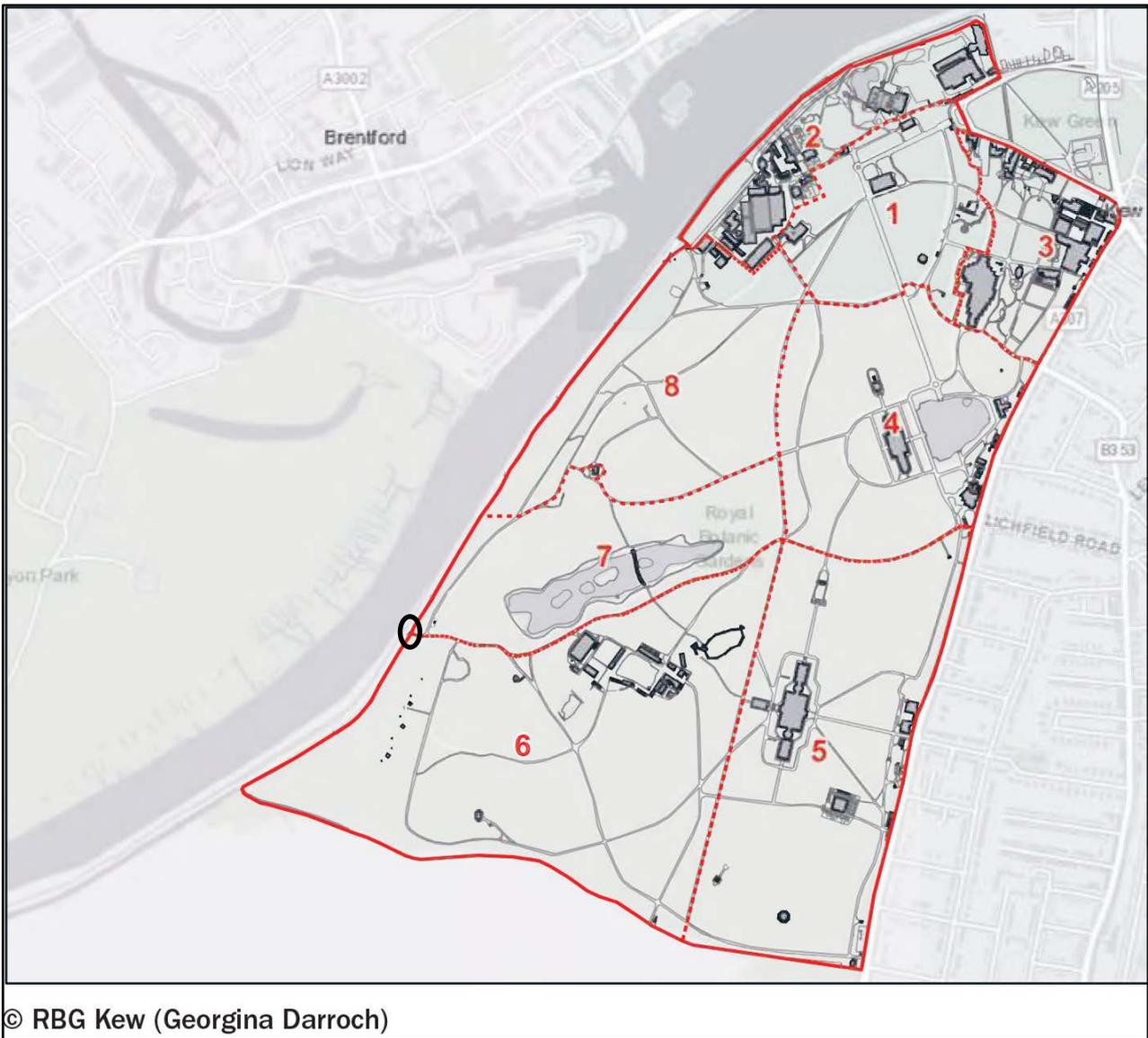


Figure 4 World Heritage Site Character Zones Map (WHS Management Plan, 2020-2025).

Isleworth Ferry Gate ringed.

Area 6 = The South-Western Zone

Area 7 = Syon Vista Zone

2 DEFINITION OF SETTING

Views of the setting are at the heart of the impact of the proposed development, principally relating to the Syon estate, and the River Thames and Towpath but also the Gillette Tower which, while a C20 feature, has the character of a quasi-church tower which does not disrupt the Arcadian character.

The following definition and guidance are reproduced from the Historic England Guidance Note:

‘The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3’ (Second Edition, 2017) (Part 1, Page 3). These are used as the basis for defining setting in this assessment.

PPG: What is the setting of a heritage asset and how can it be taken into account?⁵

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset’s curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

3 ASSESSMENT CRITERIA USED IN SECTION 5

This section explains the various aspects of the analysis and the criteria underpinning the assessment. The scales of significance, level of change and magnitude of impact in the assessment table (Section 5) are based on those identified in GLA guidance, which itself draws on UNESCO Guidelines.⁶

3.1 COLUMN 1: SIGNIFICANT HERITAGE ASSETS AND THEIR ORIGIN

Significant heritage assets affected were identified from the documentation submitted with the planning proposals and from additional site survey in November 2020 and February 2021. These heritage assets lie both in the riverside section of RBG Kew, and in the setting, including the river and Syon Park.

Their approximate historic origin has been given for clarity.

⁵ Paragraph: 013 Reference ID: 18a-013-20190723 Revision date: 23 07 2019

See <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

⁶ GLA London World Heritage Sites Guidance on Settings Supplementary Planning Guidance, Appendices 2-4, Assessment of Significance, Scale of Change & Impact Issued March 2012.

3.2 COLUMN 2: LEVELS OF SIGNIFICANCE OF HERITAGE ASSETS

Levels of significance with selected criteria as applicable to this case, based on Appendix 2 of the GLA Guidance and relating to Historic England Setting guidance Part 2, **Step 2 ‘Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated’.**

The basis for the assigned historic significance is twofold:

- i. contribution to the OUV of the WHS
- ii. historic environment designations

See Sections 4 and 5 for individual heritage assets.

Criteria:

A Very High: within WHS fundamental to the design concept or to historic interest.

International: WHS, Grade I Registered Parks & Gardens, Grade I Listed structures.

B High: within WHS essential parts or elements specific to the vocabulary of the design.

National. Including nationally designated structures (II*) & historic landscape (Registered II* & II); conservation areas containing very important buildings and spaces; undesignated structures of clear national importance; nationally designated areas or activities associated with globally important intangible cultural heritage activities. Associations with particular innovations, technical or scientific developments or movements of national significance.

C Medium: within WHS some significance: of historic interest; contributes to design complexity.

Regional to Local (Greater London and South East; Borough, Richmond Upon Thames, Hounslow). Designated structures (Listed Grade II); undesignated historic landscapes that justify special historic landscape designation; Conservation Areas.

D Low: within WHS of some interest; little contribution to design.

Local (Borough, Richmond Upon Thames, Hounslow). Historic (unlisted) buildings of modest quality in their fabric or historical associations. e.g. locally listed historic asset.

E Negligible: within WHS and beyond no contribution to historic interest

3.3 COLUMN 3: SCALE OF CHANGE

The criteria are based on Appendix 3 of the GLA Guidance and address the Historic England Setting guidance Part 2, Step 3: ‘Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it.’.

Major change: Comprehensive changes to the setting. Extreme visual effects; gross change of noise or change to sound quality; fundamental changes to design, use or access; resulting in total change to historic landscape character unit and loss of OUV. Major changes that affect the intangible cultural heritage activities or associations or visual links and cultural appreciation.

Moderate change: Changes to setting, such that it is significantly changed; noticeable differences in noise or sound quality; considerable changes to use or access; resulting in moderate changes to historic landscape character. Considerable changes that affect the intangible cultural heritage or associations or visual links and cultural appreciation.

Minor change: Change to setting such that it is noticeably changed; limited changes to noise levels or sound quality; resulting in limited change to historic landscape character. Changes that affect the intangible cultural heritage activities or associations or visual links and cultural appreciations.

Negligible change: Very minor changes to key historic setting elements; virtually unchanged visual effects; very slight changes in noise levels or sound quality; resulting in a very small change to historic character. Very minor changes to area that affect the intangible cultural heritage activities or associations or visual links and cultural appreciation.

No perceptible change: continuation of current conditions; changes which do not affect condition, appearance and perception of significant features, resulting in a negligible change in our ability to understand and appreciate the resource and its historical context and setting;

3.4 COLUMN 4: MAGNITUDE OF IMPACT CRITERIA

This assesses the positive and harmful impacts taking into account the extent and type of impact and the significance of the elements affected. It follows the Proportionate Approach to Assessing the Magnitude of Impacts in Appendix 4 of the GLA Guidance (Figure 5 below). For the purpose of this assessment the magnitudes are defined as follows:

Neutral: Little or no perceptible change in condition or setting of designated landscapes and setting of designated structures.

Small Harm: Minor change which creates dis-benefits to the historic fabric of a locally listed or Grade II registered park, Conservation Area or in the condition and setting of Grade II or locally listed structures.

Medium Harm: Moderate change which results in the major alteration or loss of elements of a locally listed or Grade II registered park, or to key elements of its setting, Conservation Area, or in the condition and setting of I/II* listed structures.

Minor change which results in damage to elements of a WHS, Grade I & II* registered park, or to key elements of its setting.

Large/ Very Large Harm: Moderate to major change which results in major alteration or the loss of significant fabric

Moderate to major change which damages the setting of a WHS, registered park, Conservation Area or I/II* listed structures considerably or greatly, or an element of cumulative changes within the setting which together constitutes major change.

LONDON WORLD HERITAGE SITES - GUIDANCE ON SETTINGS SPG

PROPORTIONATE APPROACH TO ASSESSING THE MAGNITUDE OF IMPACTS

Value of Heritage Asset	Scale of Change				
	NO CHANGE	NEGLIGIBLE CHANGE	MINOR CHANGE	MODERATE CHANGE	MAJOR CHANGE
VERY HIGH (OUV of World Heritage Sites)	Neutral	Small	Medium/ Large	Large/Very Large	Very Large
HIGH	Neutral	Small	Medium/ Small	Medium/ Large	Large/Very Large
MEDIUM	Neutral	Neutral/ Small	Small	Medium	Medium/ Large
LOW	Neutral	Neutral/ Small	Neutral/ Small	Small	Medium/ Small
NEGLIGIBLE	Neutral	Neutral	Neutral/ Small	Neutral/ Small	Small

Adapted from ICOMOS, Guidance on Heritage Impact Assessment for Cultural World Heritage Properties (Draft May 2010)

Figure 5 Proportionate Approach to Assessing the Magnitude of Impacts (Appendix 4 of the GLA WHS Setting Guidance).

3.5 COLUMN 5: COMMENTARY ON SIGNIFICANCE, EFFECT AND LEVEL OF IMPACT

This commentary includes further information on significance, assessment of acceptability and reasons.

4 HISTORIC ENVIRONMENT SIGNIFICANCES OF THE WHS

4.1 WORLD HERITAGE SIGNIFICANCE

The great artistic significance of the River Thames at this point and the estates flanking it is recognized within the inscription of RBG Kew as a World Heritage Site, and of Syon Park as a part of the buffer zone which is of sufficient historic significance to the ensemble to be added to the WHS itself.⁷ The necklace of the C18 Arcadian Thames flowing between Kew Bridge and Hampton Court has been creditably identified as a potential WHS for its worldwide influence, and this section of the river forms one of the jewels in that necklace.⁸ The Arcadian character of the reach between RBG Kew and Syon House remains, incredibly, given development pressures over the centuries, largely unspoilt but there is a real threat that this development will not only cause significant harm to this work of art, but heralds proposals for yet more tall structures which will further damage the quality, views and character.⁹

The Outstanding Universal Value which underpins the international significance of the WHS is set out in the 2020-25 Management Plan, Section 3, including the six Attributes which comprise this significance.

4.2 THE STUDY AREA

The study area within the WHS focusses on the Isleworth Ferry Gate and its environs: to the north William Nesfield's Syon Vista (laid out c.1852) and associated lawn; and to the south the Queen's Cottage grounds incorporating a key part of the Richmond Lodge grounds laid out formally by Bridgeman but remodelled naturalistically by Brown. This area has been selected as subject to the greatest damage from the proposed development.

The significance of the area within the WHS relates to Attribute i. of the six set out in the Statement of Outstanding Universal Value (SOUV) in the 2020-25 WHS Management Plan, as:

Attribute i. a rich and diverse historic cultural landscape providing a palimpsest of landscape design.

The history and significance of the gateway and that of its Arcadian and botanic garden environs have been poorly understood as an artistic ensemble (except possibly formerly by the late Ray Desmond, d.2020) and have never it seems been fully articulated. Even so, as a Listed public gateway which operated for over 100 years this seemed to comprise a key part of this area of the Arcadian Kew pleasure grounds. The accompanying report: S Rutherford, 'The Royal Botanic Gardens, Kew The Isleworth Ferry Gate and the Arcadian Landscape (February 2021) provides the basis for the following history and analysis of significances and the Figure Numbers in this section relate to that report.

The gateway was first opened in 1872 and closed c.1975. It stands on the line of the C18 Charles Bridgeman river viewing terrace (Figures 4, 5), near the site of a lost viewing pavilion (possibly that in Figure 6), for the lost Richmond Lodge to the south in the Old Deer Park. Coincidentally the western axis of the gate aligns with the dome of the great Syon Conservatory (1830s listed Grade I) and the Gillette Tower beyond (1930s listed Grade II), which can both be seen in winter from the turnstiles, framed by the iron columns. Hooker tried to reduce visibility of the gate with shrub planting adjacent, and at least one yew on the north side seems to be an original specimen, contemporary with the gate. The 1921 aerial photographs from above Syon Park show that externally it was largely hidden by then (Figures 15, 16).

⁷ This could be achieved via a process via UNESCO and the DCMS/Historic England known as a Minor Boundary Change.

⁸ E.g. in the Thames Landscape Strategy and GLA All London Green Grid SPG Chapter 5 and Area Framework 9 Arcadian Thames for GGA9 in which it is a stated aim to work towards achieving World Heritage Status for the Arcadian Thames.

⁹ A wider understanding of the significances of RBG Kew as a whole, its relationship with Syon Park, and the reasons for inscription as well as character areas are given in the Management Plan, 2020-25.

The area around the gate include areas landscaped by Brown such as the Syon Vista Lawn and land modelling around it and the 1760s ha-ha and boundary ditch (his completed work is mapped in Figure 9). Mount Pleasant north of the Syon Vista Lawn (1850s, possibly enlarging an existing mound) was clearly intended to provide an elevated and panoramic viewpoint over and along the Thames in both directions and across to Syon Park and House, although this is partly obscured by later planting. The slightly lower mound south of the Lawn would have had a similar purpose. Brown's work here and its integral relationship with his landscape at Syon, linked by the river, was much illustrated and admired in the later C18 (Figures 10,11). The Vista was part of Nesfield's 1840s wider design uniting the gardens, and focussed at the south end on the Syon Lawn and beyond this the River Thames and Brown's largely unaltered layout of Syon Park. It is mapped in Figures 12-14 and shown on 1921 aerial photographs (Figures 15, 16).

Although it has been impossible to visit repositories during the preparation of this report, key material obtained with the kind efforts of staff of the Kew Library and Archive confirms that the Director, Sir Joseph Hooker, was very aware of the Arcadian views of Kew and Syon and tried strenuously to avoid any damage to these by close attention to the minimizing the appearance of the structure and the prominence of its position.¹⁰

4.3 KEY HERITAGE ASSETS

The following heritage assets in the study area in the environs of the Isleworth Ferry Gate were identified from site visits in November 2020 and February 2021. The significance letters are based on the definitions set out above in Section 3.2 and give detail within the broader significances set out in Sections 4.1 and 4.2. The significance levels are also set out in Section 5 Assessment of the Impact of the Proposals.

Within RBG Kew, WHS & Grade I Registered Park

A Syon Vista and riverside lawns (Figure 6)

Brown's naturalistic lawn framed by trees and sculpted land form in the 1760s-70s replaced the formal early C18 Bridgeman scheme for Richmond Lodge. This was modified in the mid-C19 for the Botanic Garden pleasure grounds with the addition of Nesfield's Syon Vista framed by an avenue (c.1852). In the C18 this stretch of the river was much more open, with fewer trees, particularly on the Syon side and Syon House was the only building to be seen among the Arcadian landscape until the construction of Burton's large, graceful Palm House (1840s) at the distant end of the vista.



Figure 6 View 20 (ARC TVIA Addendum Appendix C) Winter view from the Syon Vista lawn towards Homebase site.

¹⁰ Ray Desmond's seminal *History of ... Kew* (2nd edn) provides invaluable information about the context nearby features integral to its setting, including the ha-ha, tow path, Queen's Cottage grounds, Syon Vista, etc. Further evidence may be found in the structure itself (e.g. maker's mark, date, etc), in the Kew Library and Archive (e.g. Annual Reports, accounts), and in the Office of Works files at National Archive.

See Appendix below for the sight line marked on an historic map and aerial photograph, Figures 14-17.

The foreground woody vegetation on the riverside does not have a long term future. The building on the Homebase site (ref, 2020/3099) will be visible above the background trees, right of Syon House, which, as they are mature and over-mature, also will not have a prolonged effect in screening the proposed buildings.

The restoration of greater visual links across the river based on this C18 character is a longstanding ambition of the Syon Estate's Heritage Landscape Management Plan, the Thames Landscape Strategy & RBG Kew WHS. Returning the planting in this part of the landscape to the Brown layout would be a significant heritage benefit to both Syon and RBG Kew, and this may be undertaken in the future. The landscape is actively managed and restoration of the historic inter-visibility between these two sites forms part of the respective management plans.¹¹

A Ha-ha

1767. Brick walled above a ditch, invisible barrier to entry from river and towpath (unlisted); a key part of Brown and later schemes visually uniting Kew, river & Syon. This key part of his design ensured that Kew and Syon were apparently a seamless Arcadian landscape threaded through by the river.

B Queen's Cottage grounds, western, riverside section (Figures 7, 8)

C18 Brown layout overlying and replacing Bridgeman formal scheme, blurred in later C19 & C20 by management for wildlife which included vistas over river. High significance given the origin as part of Bridgeman/Brown designs. Cottage enclosed by mature woodland. The C18 Arcadian character was replaced in the C19 and C20 by the present minimal management to enhance wildlife habitat including much screening from the river, Syon and towpath. Selected narrow vistas through this vegetation were lost in the later C20 (see 1921 APs & OS) but could be reinstated.



Figure 7 View 29 (ARC TVIA Addendum Appendix C), Wire frame of development from position within Queen's Cottage grounds (ringed).

¹¹ This information is provided in the Historic England response to the application to Hounslow Council (Alexander Bowring, Inspector of Historic Buildings and Areas, 20 May 2020).



Figure 8 View 29 (ARC TVIA Addendum Appendix C), Wire frame from within Queen’s Cottage grounds (detail, ringed). If these relatively insignificant trees were removed as part of a restoration scheme the development on the Homebase site (ref. 2020/3099) would be visible.

C Isleworth Gate 1871-72 iron drawbridge and turnstile (Figures 9, 10, 11)

Listed Grade II, possibly a very rare surviving example; a working entrance for over 100 years, now disused; carefully designed and sited to be unobtrusive and screened by evergreen shrubs. This contributes to the complexity and historic character.



Figure 9 View 27 (ARC TVIA Addendum Appendix C), Visualisation of building on Homebase site from the towpath in front of the Isleworth Gate.

See Appendix below for the sight line marked on an historic map and aerial photograph, Figures 14-17.



Figure 10 View 27 (ARC TVIA Addendum Appendix C), Visualisation (detail) of the development on the Homebase site (ref. 2020/3099) from the towpath in front of the Isleworth Gate, including proposed tower (ringed) December 2020. Syon House is to the left behind the foreground shrub. See Appendix below for the sight line marked on an historic map and aerial photograph, Figures 14-17.



Figure 11 View framed by Isleworth Ferry Gate, directly towards the Syon Park Great Conservatory and the Gillette Tower (location ringed in enlargement), in a central position. The building on the Homebase site (ref. 2020/3099) will be visible. See Appendix below for the sight line marked on an historic map and aerial photograph, Figures 14-17.

4.3.1 Within Setting of WHS (Figure 12)

A Syon Park essential designed setting for the WHS and key element of buffer zone (Registered Grade I, mansion Listed Grade I; other listed structures). Of sufficient quality and so closely related to Kew in design and historical terms that it merits inclusion within the WHS boundary.¹² See also notes above for Syon Vista. Figure 12 shows the seminal relationship between the Syon Lawn and Syon Park and House which has survived since the C18.



Figure 12 2009 ICOMOS Reference View 14b west over the ha-ha, towpath and river towards Syon House over the Park. The proposed building on the Homebase site will appear to the right of the House. See similar view c.1760 by George III (Isleworth Ferry Gate Report, Figure 8)

A River Thames (Figures 9-13)

A key feature and dynamic viewpoint for the two estates since the C18 and for many artistic works, e.g. the Canaletto 1749 view; an ancient and prestigious route.

This is a seminal element of the Arcadian landscape and the prestigious route for royalty, aristocracy, politicians and other influential and powerful people for many centuries.

This reach is the most unspoilt within Greater London and the Arcadian quality has been acclaimed constantly since the C18.

B Towpath (Figures 9, 10, 12, 13)

Ancient public route; since at least the C18 a key dynamic viewpoint for Syon and Kew estates and for artistic works, e.g. the Canaletto 1749 view (Figure 13); essential public setting for both estates.

This route was incorporated into C18 and C19 designed landscape scenes from which the views of both parks was a key feature.

¹² This could be achieved via a process via UNESCO and the DCMS/Historic England known as a Minor Boundary Change.

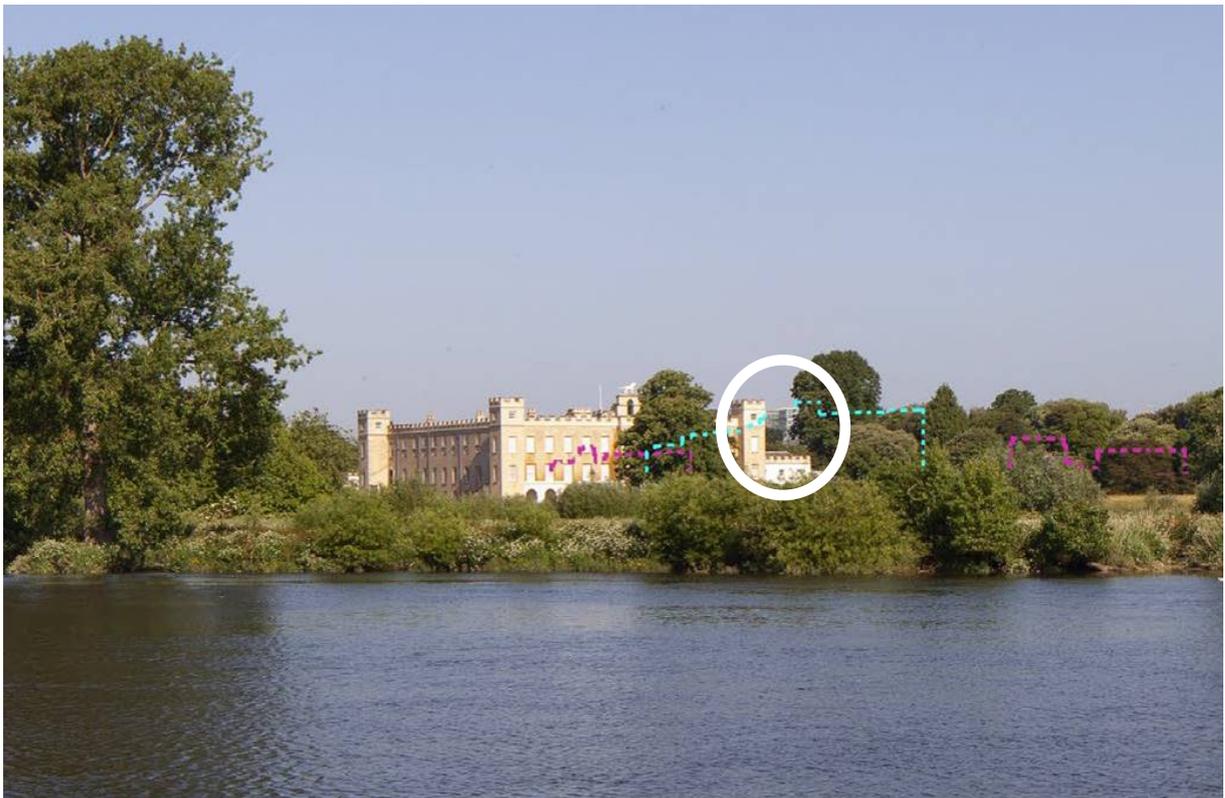


Figure 13 View 28 in ARC TVIA Addendum Appendix C, visualisation from towpath south-east of Syon House, including the form of the proposed building on the Homebase site (ringed), May 2020.

This, approximating to the Canaletto viewpoint, will be considerably more visible in winter and if the mature tree cover is depleted or lost.

See Appendix below for the sight line marked on an historic map and aerial photograph, Figures 14-15 & 18-19, together with a view further south along the towpath in which the development site is aligned next to the left-hand tower.

C Gillette Tower

Listed Grade II, Banister Fletcher, 1936-37. Over a mile away at the heart of the development site. It is visible from riverside from Kew, particularly framed by the Isleworth Gate (Listed grade II), seen as a quasi-church tower among the trees of Syon Park in the English Landscape tradition above the 1830s Great Conservatory dome (Listed grade I) in Syon Park. This view of the tower will be lost, as it will be screened by the new buildings which will rise behind the dome, framed by the Doric columns of the gateway. See Appendix below for the sight line marked on an historic map and aerial photograph, Figures 14-17.

5 ASSESSMENT OF IMPACT OF THE PROPOSALS

The proposals affect the western side of the WHS, particularly the river boundary at the point where the visual relationship with Syon House and Park is strongest. This is an extremely important connection. Not only is Syon the principal element of the WHS Buffer Zone at this point, but it is also an internationally significant designed landscape in its own right. The two estates are integrally linked historically, visually and in design terms by the C18 works carried out at both sites.

1. Relevant heritage attribute	2. Significance of attribute	3. Scale of change	4. Magnitude of impact	5. Commentary
A. WITHIN RBG KEW WHS				
Syon Vista and riverside lawns (Figure 6)	A	Moderate change to historic character	<p>Large</p> <p>Potential for Very Large</p>	<p>Brown 1760s-70s naturalistic grounds for Richmond Lodge, replaced formal Bridgeman scheme; modified 1850s for Botanic Garden pleasure grounds. Westerly views over the river to Syon House and Park are seminal in the design.</p> <p>In these westerly views the buildings will appear to the right of Syon House, above a partial screening of mature trees in the dynamic and panoramic views. Historically, this stretch of the river was much more open, with fewer trees, particularly on the Syon side and the house was the only building to be seen among the Arcadian landscape. The currently uninterrupted skyline and night-time darkness will be disrupted. The restoration of greater visual links across the river is a longstanding ambition of the Syon Estate's Heritage Landscape Management Plan, the Thames Landscape Strategy & RBG Kew WHS. Returning the planting in this part of the landscape to the Brown layout would be a significant heritage benefit to both Syon and Kew, which may be undertaken in future. The landscape is actively managed and restoration of the historic inter-visibility between these two sites forms part of the respective management plans. In addition the present trees are clearly mature and heading to the end of their lifespan. Thus the screening of the proposals by the existing vegetation cannot be used as a reliable permanent / long term mitigation. Historic England recommended that the likely visual impact should be established should some of this vegetation be removed, but this information has not been supplied by the applicant.¹³ There is the potential for great visibility of the development if trees on the bank immediately opposite the Syon Vista lawns are removed, lost in a storm or subject to disease. NB: Kew has no control over these features.</p>
Ha-ha	A	Moderate change to historic character	Large	<p>1767 Key linear part of Brown scheme visually uniting RBG Kew, river & Syon. The invisible physical boundary facilitates uninterrupted views between the Syon estate and Kew WHS enhancing the Arcadian character. The buildings will appear at least to the right of Syon House, above a partial screening of mature trees and possibly above the building from viewpoints further south in dynamic and panoramic views. This was a key part of Capability Brown's design to ensure that Kew and Syon were apparently a seamless Arcadian landscape threaded through by the river. The currently uninterrupted skyline and night-time darkness will be disrupted.</p>

¹³ Historic England pre-application response to Hounslow Council on the scheme (Alexander Bowring, Inspector of Historic Buildings and Areas, 20 May 2020).

1. Relevant heritage attribute	2. Significance of attribute	3. Scale of change	4. Magnitude of impact	5. Commentary
<p>Isleworth Gate (Figures 9-11)</p>	<p>C Listed Grade II element of the WHS design</p>	<p>Moderate change to historic character</p>	<p>Medium</p>	<p>1871-72; an entrance to the WHS for 100 years. Westerly views over the river to Syon House and Park are seminal in the design and visitor approach to this gateway, particularly framed in the exit experience. This was carefully sited and screened by evergreen planting by Joseph Hooker to minimise its visibility and disruption to the perceived high value of the C18 Arcadian scene. He may have aligned it deliberately on the dome of the Great Conservatory at Syon. The buildings will appear to the right of Syon House, above a partial screening of mature trees. The currently uninterrupted skyline and night-time darkness will be disrupted. It contributes to the complexity and historic character. The Gillette tower and the dome of the Great Conservatory align with and are framed by the Isleworth Gate. Thus the Homebase site building will be visible through the listed gateway, disrupting the skyline above the Syon estate and screening the Gillette Tower with a bulky form alien to the scene.</p>
<p>Queen's Cottage grounds, western section (Figures 7, 8)</p>	<p>B relatively high given the origin as part of Bridgeman/Brown designs and potential for evidence</p>	<p>Minor change to historic character and views</p>	<p>Small Potential for Medium harm</p>	<p>C18 Brown layout blurred in later C19 & C20 but included vistas over river. The C18 Arcadian character of the Cottage grounds was replaced in the C19 and C20 by the present minimal management to enhance wildlife habitat including much screening from the river, Syon and towpath. Selected narrow vistas through this vegetation were lost in the later C20 (see 1921 APs & OS) and if reinstated may be damaged by the development. If some vegetation were removed from the riverside, the new buildings will appear to the right of Syon House, above a partial screening of mature trees adjacent and possibly above the house itself.</p>
<p>B. SETTING</p>				
<p>Syon Park (Figures 6, 9-13)</p>	<p>A</p>	<p>Major change to historic character and views</p>	<p>Very Large</p>	<p>Fulfilled this role since late C17/ early C18. The scene of dynamic and panoramic views of Grade I RPG Syon Park and listed Grade I Syon House from RBG Kew, the river and the tow path; these are some of the most important to the WHS. The new buildings will appear above this scene in the unbroken skyline, and contribute night-time light in an otherwise dark zone, causing great harm to the WHS attributes and Syon historic environment. The dome of the Great Conservatory (1830s Listed Grade I) aligns with the view through the Isleworth Ferry Gate and the new building will be seen above this, screening the Gillette tower which currently terminates the view as a quasi-church tower. Specific views of particular significance are the 1749 Canaletto painting of Syon House from the tow path to the south-east, and from further north on the site of Richmond Lodge terrace, now the Syon</p>

1. Relevant heritage attribute	2. Significance of attribute	3. Scale of change	4. Magnitude of impact	5. Commentary
				Vista lawn, to west and south-west towards Syon House. Beyond the house it will also greatly damage views from the south drive, a major approach.
Towpath (Figures 9, 10, 12, 13)	A or B as dynamic viewpoint for the 2 estates C as route	Moderate change to historic character & views	Large	Ancient public route incorporated into later designed scenes from which the views of both estates was a key feature. The linear dynamic and panoramic viewpoint for Syon and Kew estates, it is part of the essential setting for both. The buildings will appear to the right of Syon House, above a partial screening of mature trees and also possibly above the building from viewpoints further south, e.g. the Canaletto 1749 view. The Arcadian character including the skyscape will be disrupted including at night with light emission from the buildings.
River Thames (Figures 6, 9, 10, 12, 13)	A	Moderate change to historic character & views	Large	A key linear feature and dynamic viewpoint for the two estates and as an ancient and prestigious route incorporated into later designed scenes from which the views of both parks was a key feature. This is the seminal element of the Arcadian landscape and a prestigious scene of travel for royalty, aristocracy, politicians and other influential and powerful people. The Arcadian Thames has been acclaimed continually since the C18 and is of the quality for a potential World Heritage Site in its own right. This reach has the most unspoilt Arcadian quality of that internationally significant Thames within Greater London. The buildings will appear to the right of Syon House, above a partial screening of mature trees disrupting the skyscape and also possibly above the building from viewpoints further south, e.g. near the Canaletto 1749 viewpoint.
Gillette Tower (Figures 6, 9, 10, 12, 13)	C	Major change	Medium/ Large	Banister Fletcher, listed Grade II, 1936-37. Seen from Kew, particularly framed by the Isleworth Gate over a mile away, as a quasi-church tower among the trees of Syon Park in the English Landscape tradition.

6 CONCLUSIONS

6.1 CUMULATIVE MAGNITUDE OF EFFECTS ON COMBINED HERITAGE ASSETS ABOVE, WITHIN RBG KEW AND IN SETTING.

1. The assessment in Section 5 clearly identifies a large cumulative magnitude of effect on the attributes of the WHS and setting of these highly significant heritage assets. This amounts to a **large harmful impact**.
2. The development will amount to a cumulative and highly damaging effect in views with the potential for worse damage if the tree screen in Syon Park alters.
3. This proposal paves the way for incremental damage to the setting and important and dynamic views, and further significant damage to the Arcadian character of Kew. Existing tall buildings are glimpsed in the direction of Boston Manor, particularly GSK and the Bull Building, but these are seen as disparate minor intrusions. Otherwise there is no sense of envelopment by modern city as of yet.

6.2 SPECIFIC HARM TO ATTRIBUTES OF OUV

The outlook from Kew to Syon remains essentially a Brownian landscape focused on the river: “one of the most celebrated and beautiful reaches of the Thames” as noted by Joseph Hooker 150 years ago and one which he actively sought to preserve during a major period of change elsewhere at Kew.

The impact relates specifically to the setting of the Kew WHS. The harm to the setting relates to the landscape design and sense of space which affects heritage assets of very high significance. These assets contribute to the OUV, relating particularly to WHS Attribute i: a rich and diverse historic cultural landscape providing a palimpsest of landscape design.

Informed by the views supplied by the applicant and the findings of this Heritage Impact Assessment, it is clear that the principal harms affect Attribute 1: *A rich and diverse historic cultural landscape providing a palimpsest of landscape design*. These harms are both to the setting of physical features and the more experiential qualities of Kew’s historic and cultural landscape identified in 3.2.1 of the WHS Management Plan, in particular features i, iii, iv, v and vi, in the following ways:

1. Visual intrusion in to the Victorian garden layout, in particular a new cluster of buildings seen from the outlook from Syon Vista and Lawn.
2. Harm to the surviving Capability Brown landscape including Brown’s Ha-ha and the visual connection to the Thames and to Syon Park, which are “of a piece” with Kew.
3. Visual intrusion in to the Arcadian Thames which comparable to the Kew WHS itself in terms of significance and one of the least altered reaches.
4. Harm to the setting of individual heritage assets both within Kew and beyond, in particular Syon Park mansion and the Great Conservatory.
5. The loss of the sense that this part of Kew and Syon, as a “world apart” due to the a of a cluster of buildings overtopping the current tree screen.
6. Night time light outspill from the cluster of buildings into what is currently a dark zone.

6.3 CUMULATIVE HARM

The proposed development - if allowed - would set a precedent for further invasive developments at Syon Lane. In particular, the concurrent outline application for the Tesco site, although lower and further away, will broaden the cluster formed by the Homebase development to the right of Syon House.

6.4 CONCLUSION

The proposed development will be transformative on the setting, particularly views of the presently unaltered scene around Syon House. A large cluster of buildings of alien form on and above the tree line will disrupt the views and distract from Syon House, the architectural centrepiece, and its parkland frame. These buildings will intruding rudely into Arcadian Kew and Syon, a “world apart” which offers an otherwise lost experience separate from, and contrasting with, the modern city. This damage will be compounded by the adjacent Tesco site redevelopment, which will contribute cumulatively to the visual harm caused in the manner described above.

7 APPENDIX: SIGHT LINES FROM KEW RIVERSIDE OVER SYON PARK TOWARDS DEVELOPMENT SITE

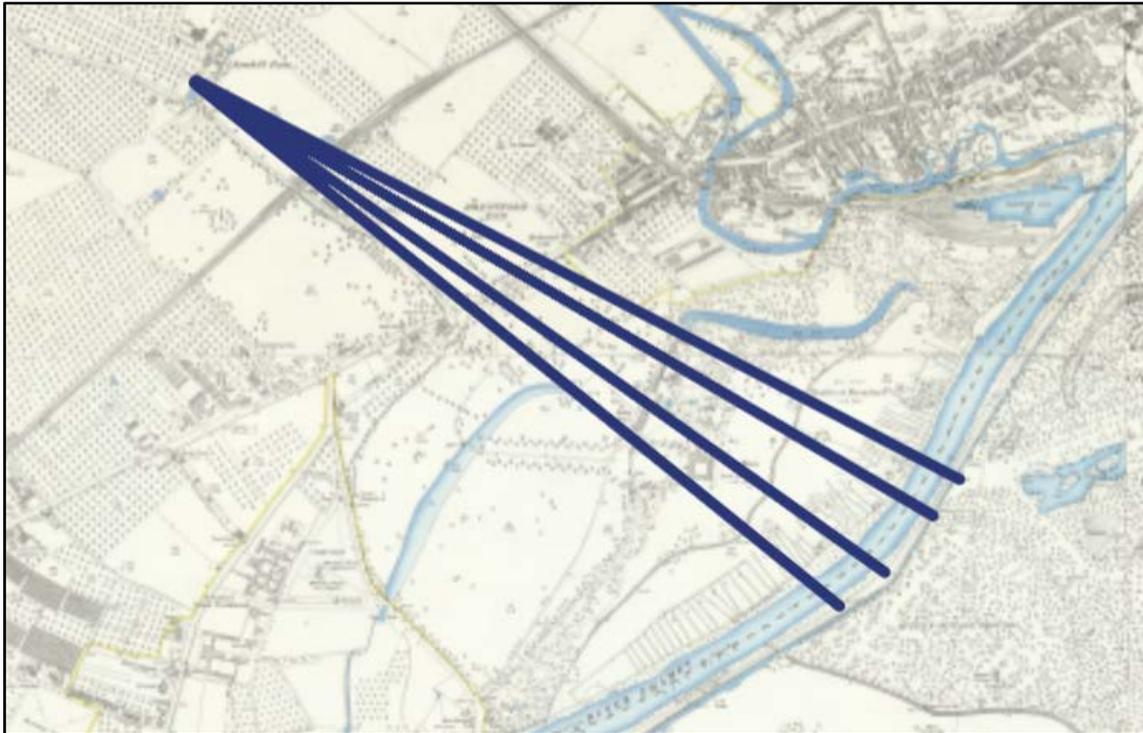


Figure 14 Four key view lines from Kew over Syon Park towards the development site, Ordnance Survey 25" scale late C19/early C20.

These mark the lines in Figures 6 (Syon Vista Lawn), 9-11 (Isleworth Ferry Gate), 13 (Canaletto viewpoint) and viewpoint further south from the towpath in front of the Queen's Cottage Grounds.

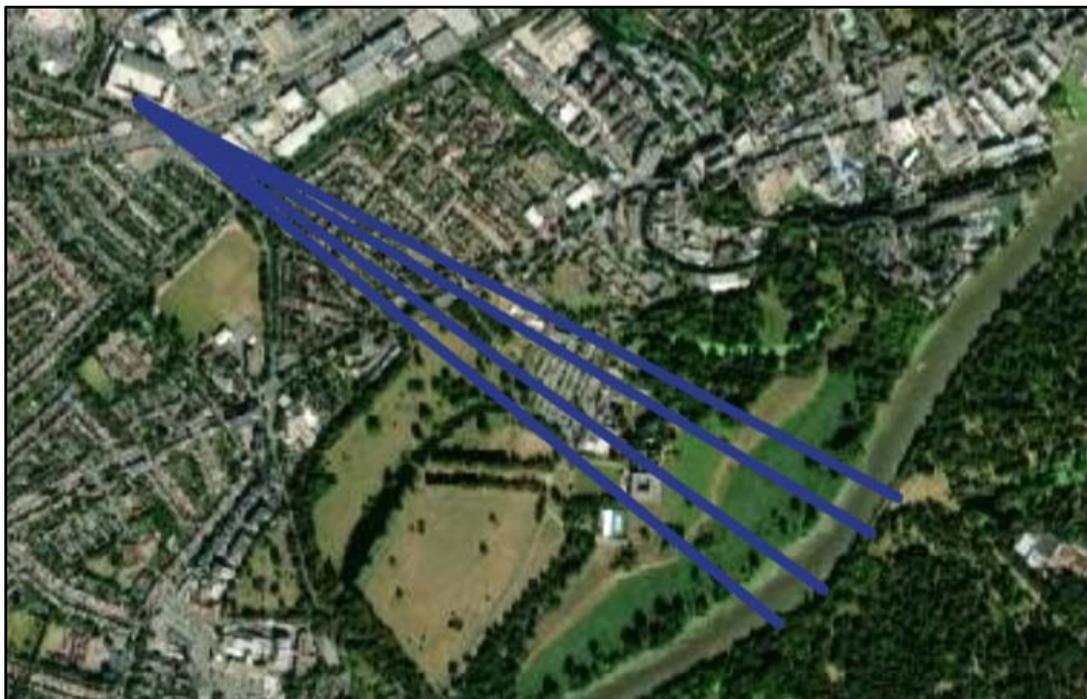


Figure 15 Four key view lines from Kew over Syon Park towards the development site; modern aerial photograph.

These mark the lines in Figures 6 (Syon Vista Lawn), 9-11 (Isleworth Ferry Gate), 13 (Canaletto viewpoint) and viewpoint further south from the towpath in front of the Queen's Cottage Grounds.

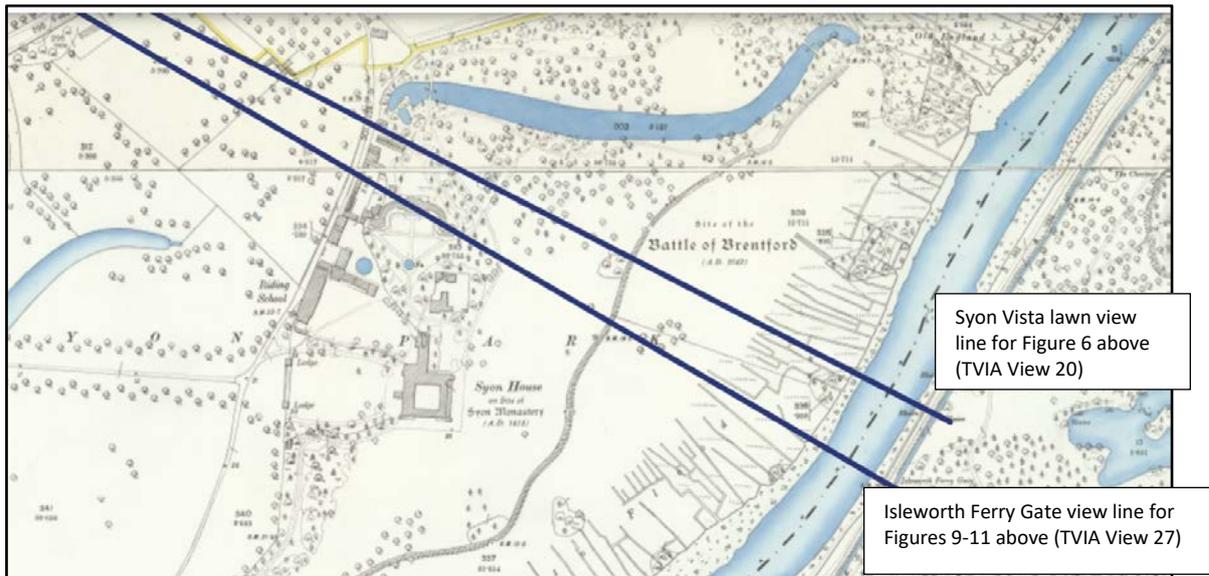


Figure 16 View lines for Figures 6 (Syon Vista Lawn) and 9-11 (Isleworth Ferry Gate), OS 25" scale late C19/early C20.



Figure 17 View lines for Figures 6 (Syon Vista Lawn) and 9-11 (Isleworth Ferry Gate), modern aerial photograph.

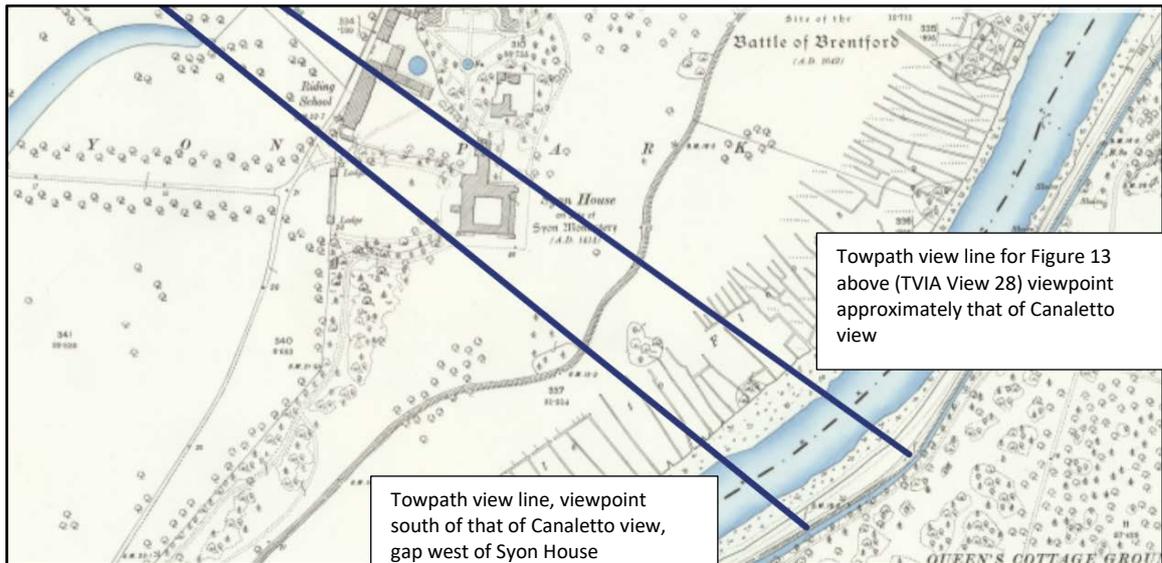


Figure 18 View lines for towpath including Figure13 (Canaletto viewpoint), OS 25" scale late C19/early C20.

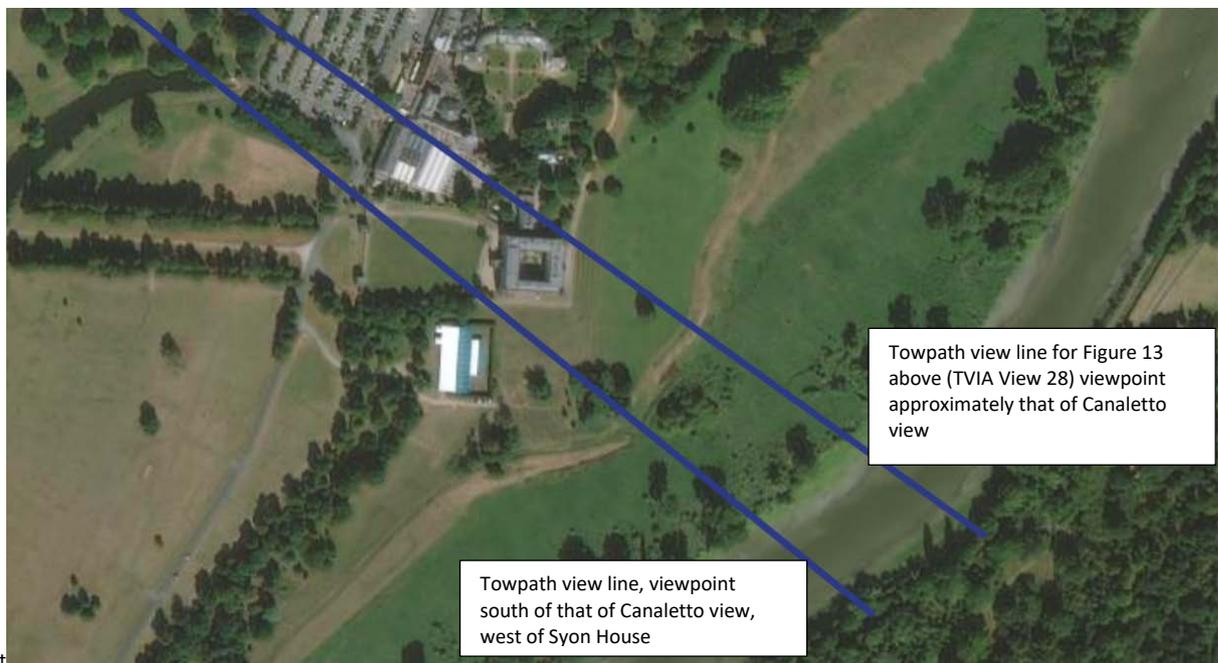


Figure 19 View lines for towpath including Figure13 (Canaletto viewpoint), modern aerial photograph.