

**APPENDIX 7.2**  
**HISTORIC ENGLAND CORRESPONDENCE**



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Dear Kevin Murphy

## **Request for Pre-application Advice**

### **Homebase, Syon Lane, Brentford, Isleworth, TW7 5QE**

Thank you for arranging the initial meeting on 17 February, and for sending through further information to help us make an assessment of the proposals on 23 April.

This letter concerns the proposals for the Syon Lane Homebase site and its impact on the historic environment. The specific impacts of the proposed development for the Osterley Tesco site will be discussed in a second letter.

## **Summary**

Historic England recognises the development potential of the site. However, we have significant concerns regarding the potential impact on the setting of the Syon Park Grade I registered landscape, which is a highly designated and important heritage asset. We recommend that further analysis of significance in order to better understand the impact of the development and inform design revisions to avoid or minimise harm. This is likely to involve a reduction in height. We also recommend further investigation in order to determine the possible extent of the impact on the Royal Botanic Gardens, Kew World Heritage Site.

## **Advice**

### *Significance of the heritage assets*

Syon Park has a long history which begins with the foundation of Syon Monastery in the early-fifteenth century. It was later repurposed as a country estate following the Dissolution and remains one of London's most important large houses, with significant developments from the sixteenth century onwards. The park was re-landscaped by Lancelot 'Capability' Brown in the mid-eighteenth century alongside architectural interventions by Robert Adam, later James Wyatt and Charles Fowler. It forms an essential relationship with the Royal Botanic Gardens, Kew World Heritage Site, falling





within its buffer zone and together forming a pair of substantially intact Brownian landscapes of the highest significance. The site contains a number of highly listed buildings and structures, notably the house and its gate lodges and the 'Lion Gate' which are all Grade I, and the Park itself is a Grade I registered landscape. Brown is widely acknowledged as the country's greatest and most influential landscape designers and it is largely his legacy at Syon which merits the designation of the park at the highest grade. It is one of his early and most influential designs – notably leading to the royal commission at Kew across the river.

Brown's involvement at Syon spanned two phases in the 1750s and 60s, beginning in 1754, when he was employed by Hugh Percy (1714-86) then the Earl of Northumberland. Elements of the existing landscape predate his involvement; the great lime avenue had been planted in c.1700 and the terraces and formal gardens had already been cleared by the Earl following his acquisition of the estate in 1748. In the first phase, Brown undertook extensive planting to the north-east of the house, in addition to the creation of the lake here and the ha-ha to the East Lawn. At around the time that the earldom was elevated to a dukedom in 1766, Brown was again engaged to redesign the parkland to the west of the house, incorporating the avenue and including the creation of another lake. This involved diverting Syon Lane and the removal of Syon Farm, and further tree planting.

Brown used trees to either frame pleasant views and to hide unattractive ones. Tree clumps would get progressively larger as they became closer in proximity to woodland or tree belts, to merge the cultivated parkland with the rural landscape beyond. Brown often created tree belts around the perimeter to screen the outside world – one of Brown's significant achievements at Syon is making a relatively small site seem much larger than it actually is, creating the impression of extensive rural parkland which largely remains apparent. The Buildings of England volume London 3: North West describes "the approach through the park, so close to the busy London Road, yet preserves the illusion of the countryside".

Historically, the main approach to the house began at the Lion Gate on London Road, through the parkland and across the lake to the lime avenue and gate lodges; this route is now disused. Park Road is now the main public route through the estate, this too was probably a route created by Brown. It roughly follows the line of another earlier avenue which was presumably cleared by him, or slightly earlier. It is assumed that he altered its alignment so that it was no longer such an unnaturally straight line, and exploited the route to provide views over his newly created western parkland.

### *Impact of the proposed development*

The proposals are for the clearance of the site and the construction of buildings up to 17 storeys (78.550 AOD) in height.

The development proposals would not physically impact any designated heritage assets. The existing building on the site is subject to a recent Certificate of Immunity



from Listing.

However, as a result of the height and massing of the scheme a visual impact will be appreciable from a wide range of vantage points, most notably from within the Grade I registered Syon Park. The scale of impact would vary seasonally to some degree due to the screening effects of trees.

### *Legislation, Policy and Guidance*

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 to the desirability of preserving the setting of a listed building.

Guidance on the fulfilment of statutory planning duties is set out in the Government's **National Planning Policy Framework 2019 (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. The following paragraphs are considered to be of particular relevance in this case:

- *189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance...*
- *190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal*
- *194. 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.*

The NPPF is clarified further in case law. Following the ruling in *Barnwell Manor Wind Energy Limited v East Northamptonshire District Council*, English Heritage, the National Trust and the Secretary of State for Communities and Local Government [2014] EWCA Civ 137, considerable importance and weight should be given to the desirability of preserving the setting of a listed building when carrying out the planning balance. Less than substantial harm does not equate to a less than substantial

planning objection. There is a presumption that preservation is desirable.

**The Planning Practice Guidance 2019 (PPG)** provides further guidance on the NPPF concepts of significance and setting:

- Para 006: ‘Significance’ in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset’s physical presence, but also from its setting
- Para 007: Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals
- Para 013: 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.

More detailed guidance relating to setting is found in Historic England’s **‘The Setting of Heritage of Assets: Historic Environment Good Practice Advice in Planning**



**Note 3'** recommends the following staged approach to the NPPF's proportionate assessment where the settings of heritage assets are affected:

- *Step 1: Identify which heritage assets and their settings are affected*
- *Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated*
- *Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it*
- *Step 4: Explore ways to maximise enhancement and avoid or minimise harm*
- *Step 5: Make and document the decision and monitor outcomes*

On 'Cumulative change' it states *'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.'*

It also contains particularly relevant guidance for designed settings, such as those relating to country houses on p.5. Further to this, Para 11, states *'Views which contribute more to understanding the significance of a heritage asset include: „*

- *those where the composition within the view was a fundamental aspect of the design or function of the heritage asset...*
- *...those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected...'*

Relevant emerging policies in the **Draft New London Plan (Intend to Publish 2019)** include:

Policy D9, Tall buildings Part C states *'proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm...'* and *'buildings in the setting of a World Heritage Site must preserve, and not harm the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it'*

Policy HC1 Heritage conservation and growth, Part C states *'Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.'*



Policy HC2 World Heritage Sites Part B states *‘Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.’*

Part C states C *‘Development Proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment’*

The following **Hounslow Local Plan** policies are of relevance:

CC3 (Tall Buildings) states that Tall buildings should *‘be carefully placed so as not to create a wall of tall buildings, ensuring they relate sensitively to surrounding residential areas and do not have a significant adverse impact on the setting of, or views from heritage assets including Gunnersbury Park, Royal Botanic Gardens Kew World Heritage Site, Syon Park and Osterley Park...’*

CC4 (Heritage) states that all developments should *‘Conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance’ and that developments should “Conserve and enhance the internationally recognised Outstanding Universal Value of the Royal Botanic Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from the site’*

### *Historic England’s Position*

The verified views provided show that the development would be visible from various points within the north and western areas of the park. Views 14 and 15 in particular suggest a significant visual impact and slightly different vantage points than the ones chosen would reveal a greater impact without the single foreground trees screening the development. The views provided that are closer to the centre of the park and the house suggest a lesser impact, but it is likely that the development will be visible from a far greater number of viewpoints in this part of the landscape, because it is generally possible to see the Gillette Tower.

The key issue in understanding the impact of the proposals on Syon Park and House (both as listed building and registered landscape) is establishing the extent to which the setting of the park and house contribute to their significance. We recommend that you explore this further in your Heritage Statement as this is key to NPPF’s approach to avoiding and minimising harm to heritage assets.

In our view, the setting of the park makes an integral contribution to its significance,



and this significance would be harmed as a consequence of the proposed development in its current iteration. The level of harm would likely fall under the 'less than substantial' category of the NPPF, which represents a serious impact and requires clear and convincing justification.

Views beyond the boundary are important to appreciating significance because these were essential to Brown's thinking. Prominently visible urban development would markedly diminish the perception of rural parkland, undermining the design intention of the landscape. It will be possible to remove or significantly minimise this impact in a number of views by reducing the maximum height of the development. In the views further to the west of the park a development of any substantial scale would remain visible. It may be possible to lessen the impact by lowering the building heights to below the height of the mature trees for example; however it is likely that a harmful impact would remain.

We would caution against relying on an analysis of the landscape in terms of axial and symmetrical relationships. Though there are clearly elements of Syon Park which are best understood along these lines, they are remnants of earlier approaches to rigidly planned landscape design where the house was the focal point. By the time of Brown's ascendancy planned irregularity was fashionable, in pursuit of the creation of an idealised natural landscape. This was a phenomenon particular to England and is closely linked to early eighteenth century landscape painting (which had become fashionable among the nobility). Landscapes were thought of in artistic, compositional terms, with a foreground, middle ground and background. Historic England's 'Register of Parks and Gardens Selection Guide' for Rural Landscapes provides a helpful summary of the typical characteristics –

*'Landscapes around houses were transformed, or laid out from scratch, in an idealised 'natural' manner, with pasture ground running uninterrupted from the house (animals being kept at a distance by an unseen ha-ha) into gently undulating grounds studded with clumps of trees, and with the world beyond screened by plantation belts around the park edge. The key feature of interest was usually a lake in the middle distance, ideally contrived to resemble a great river curving through the park.... Typically the house was approached by a sweeping, curvilinear drive – such parks were meant to be experienced in motion – which wound through the extensive parkland, allowing the carriage-borne visitor to catch varied glimpses of the lake and house between the parkland clumps and plantations'*

In addition to the main approach to the house would have been additional routes and circuits, each with their own views or different experiences of the same prospects and vistas, such as Park Road. The suggestion that the axial vistas are the most important views at Syon is therefore not considered to be an appropriate hierarchy and misses the complexity of the design. It is also not possible to rely on a series of fixed views to understand the impact on significance, as this is not the sole way in which Brownian landscapes were designed to be experienced. An appreciation of kinetic views is crucial to understanding the impact.



The Gardens Trust have recently published *Vulnerability Brown: Capability Brown landscapes at risk* (2017), which is written by experienced landscape historians; including noted experts on Brown. It discusses various threats to Brown landscapes, including setting issues; an image of insensitive development visible from Syon Park is used to illustrate the point. There is some modern, unsympathetic development visible from certain parts of the park, particularly in views looking east, and these detract from its setting. In addition, the hotel and garden centre have already resulted in some harm to its significance and the noise from air traffic presently also has a negative, albeit transient, impact on setting.

Current proposals need to be assessed cumulatively in the context of previous impacts as according to the NPPF/PPG; they do not represent a reason to permit further harmful changes. At present the north and west vistas are largely unspoilt by visual intrusions (aside from the Gillette Tower) and the illusion of the countryside is well preserved. As a consequence of the development, a much greater proportion of the park would not be experienced as it was intended to be. This represents a considerable adverse impact, further eroding the perception of a rural landscape which is essential to appreciating the way it was intended to be experienced.

We also do not consider that the Gillette Tower represents a comparable visual intrusion into the setting of the Park as the proposed development might. It is a slender, sculptural object which is essentially a decorative part of a larger building. In many respects it is more akin to a church spire – a feature that was often borrowed as an eye catcher beyond the park boundary by eighteenth century landscape designers. In contrast, the proposals present a wall of distinctly urban development which would have an alien presence and bring with it other impacts such as light spill.

Views from Kew, the river itself and the tow path are some of the most important of Syon House and Park. We do not consider that we have sufficient information in order to be confident that the proposed development would not appear in this backdrop, which would likely have a detrimental impact on the significance of both the registered landscape and Kew World Heritage Site. We recommend a further views study in order to establish this. A specific view which we strongly recommend is tested is an approximation of the 1749 Canaletto painting of Syon House from the south east, on the tow path. We would be happy to discuss the specific location for this view with you.

View 20 provided is from within World Heritage Site, looking across the river to Syon. Historically, this stretch of the river was much more open, with fewer trees, particularly on the Syon side. What might be Brown's original planting scheme with clumps of trees is visible on historic maps and aerial photographs from the 1920s (Britain From Above refs EPW001673 and EPW005273 in particular). However, earlier OS Maps suggest that there might have been even fewer trees on the river bank. The restoration of greater visual links across the river is a longstanding ambition of the Syon Estate's Heritage Landscape Management Plan and the Thames Landscape Strategy. Returning the planting in this part of the landscape to the way Brown intended it would



be a significant heritage benefit to both Syon and Kew, and it is possible that this may be undertaken in the future. The landscape is being actively managed and restoration of the historic inter-visibility between these two sites forms part of their respective management plans. We therefore give little weight to the screening of the proposals by the existing vegetation until further detailed analysis has been undertaken, and recommend that you establish the likely visual impact should some of this vegetation be removed.

Wire lines have been used for all of the distant views whilst the massing has been under review and is not fixed. In order to better understand the visual impacts on Syon's registered landscape, we recommend that some accurate verified views which depict the articulation of the proposed buildings are provided at the next stage. As we have previously requested, I would also be grateful if you could provide us with the relevant VU.CITY data or model so that we are able to more thoroughly analyse the impact of the proposals as soon as possible.

### **Recommendation**

Thank you again for consulting Historic England at an early stage regarding these works. This letter concludes our free initial cycle of pre-application advice. We would be keen to continue to work with you as this major scheme develops. We offer an Extended pre-application service charged on a cost-recovery basis, which we would be happy to discuss with you directly.

We would encourage you to consider any opportunities for reducing the harm outlined above and would be happy at any stage to discuss options with you. It is likely that this will require a reduction in height.

Yours sincerely

### **Alexander Bowring**

Inspector of Historic Buildings and Areas

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**Homebase, Syon Lane, Brentford, Isleworth, TW7 5QE**  
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### **List of information on which the above advice is based**

St Edward/Patel Taylor pre-application presentation; KMHeritage Heritage Statement; additional verified views (3no.)