

# **(BUILT) HERITAGE, TOWNSCAPE AND VISUAL IMPACT ASSESSMENT**

**THE GREEN, SOUTHALL**

**OCTOBER 2021**



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# 1.0 INTRODUCTION

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## THE SITE AND SURROUNDINGS

- 1.7 The Site is located in the London Borough of Ealing the local planning authority (the 'Council' or 'LBE'). The Site is currently occupied by an irregular range of light industrial warehouses, storage units and surface car parking. The majority of buildings at the Site date from the mid-to-late-twentieth century.
- 1.8 One building (The Tudor Rose) fronts The Green, and comprises a heavily altered former cinema, which is to be retained.
- 1.9 The Site has an irregular boundary, set back from The Green to the south and east and from the railway line to the north, and encompassing Featherstone Terrace to the west. The townscape quality is unwelcoming, and the Site has a back-of-house character. Access is afforded to the Site from a number of routes linking to The Green.
- 1.10 The Site is not within a Conservation Area and does not contain any statutorily listed buildings. The surrounding area does not contain any sensitive historic land designations such as a Registered Park and Garden.
- 1.11 There is one, highly graded heritage asset in the vicinity of the Site; Southall Manor House (grade II\*), which is situated on the south side of The Green, within an area of open space at the entrance to Manor House Grounds. The significance of this building, and the contribution made by the Site to its setting, are set out at **Section 5.0**. The potential effects of the proposals upon that setting are assessed at **Section 8.0**.
- 1.12 There are a number of designated heritage assets within a 1000m radius of the Site. The Site is not located in strategic views identified in the London View Management Framework (Greater London Authority, 2012).
- 1.13 The townscape context in the environs of the Site is mixed. In the main, the surroundings comprise low quality high street frontages with ground floor shop fronts, and wide expanses of residential development.

## PURPOSE OF THE REPORT

- 1.14 The HTVIA provides an assessment of the impact of the Proposed Development on heritage assets, townscape character areas and visual amenity. The principal heritage consideration is whether the Proposed Development will preserve or enhance the contribution made by setting to the significance of Southall Manor House (grade II\*), which is located on the south of The Green.

- 1.15 The townscape assessment will consider the Proposed Development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces.
- 1.16 The (built) heritage assessment will consider the significance of heritage assets and the impact of the Proposed Development upon that significance. The Site does not contain any heritage assets, although there are heritage assets in the wider area, including Southall Manor House (grade II\*) and the HTVIA assesses the potential of the Proposed Development to impact their setting.
- 1.17 The visual assessment will consider the impact of the Proposed Development upon visual amenity. The assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. 'Visual receptors' are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features.
- 1.18 The assessment is informed by accurate visual representations (verified views). The location of the viewpoints has been informed by architectural and historic accounts of the area, an appraisal of the existing Site and surroundings, and relevant policy designations.

## THE PROPOSALS

- 1.19 The proposals seek to redevelop and landscape the Site to deliver 564 residential units 2922.8sqm of commercial floorspace (Class A1-A3, B1, D1 and D2) across buildings of 2-19 storeys.
- 1.20 The proposals have been developed through an iterative design process, comprising extensive pre-application consultation with officers from Ealing Council and discussion with Historic England. The authorities are supportive of the principle of the regeneration of this site which is in accordance with the requirements of the allocation set out in the Development Sites DPD.
- 1.21 The proposals have also been presented to the local community through public consultation events and stakeholder discussions. The timeline of public engagement undertaken is set out in the Design and Access Statement prepared by Hunters architects and the Statement of Community Involvement.

## STRUCTURE OF THIS REPORT

- 1.22 This report is structured as follows:
- **Section 2.0** provides an overview of the methodology adopted for the assessment;
  - A summary of the legislative and planning policy context relevant to the HTVIA is set out at **Section 3.0**;
  - A Site description and overview of the historic development of the surrounding area is provided at **Section 4.0**;
  - An historic and architectural appraisal of the heritage assets and their setting are identified at **Section 5.0**. In accordance with paragraph 189 of the NPPF this section also provides an assessment of the heritage assets' significance;
  - Analysis of the existing townscape character is provided at **Section 6.0**;
  - **Section 7.0** describes the development proposals and the process of pre-application consultation;
  - **Section 8.0** provides an assessment of the impact of the Proposed Development on heritage assets;
  - The townscape effects of the Proposed Development are assessed at **Section 9.0**;
  - An assessment of the visual impact of the Proposed Development is provided at **Section 10.0**. This section is supported by verified Accurate Visual Representations prepared by Hayes Davidson.
  - At **Section 11.0** the report is concluded with a summary of the proposal's compliance with legislation and policy.



# 2.0 METHODOLOGY

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# METHODOLOGY

2.1 This section provides an overview of the assessment framework. The method is the product of legislation, policy and best practice guidance.

## STUDY AREA

2.2 The study area comprises:

- All heritage assets (1000m radius):
  - listed buildings;
  - conservation areas;
  - registered parks and gardens;
  - scheduled ancient monuments; and
  - locally listed buildings (non-designated heritage assets).
- Townscape character areas (500m radius);
- Visual receptors (within the visual envelope of the Site).

2.3 Site observations, a manual desk-based review of OS maps, characterisation studies and relevant heritage assets were used to determine the study area. The study area has been informed by building locations and heights, topography and townscape features, and an understanding of the scale of the Proposed Development.

2.4 **Section 11.0** identifies viewpoints that have informed the 'visual study area'. The study area may be defined as the anticipated extent of visibility (from a height of approximately 1.5m (eye level) above the ground). It is acknowledged and accepted that judgments made by a surveyor are subjective, which provides limitations to the identification of a visual envelope. There will be areas within the study area where visibility is not possible e.g. due to interposing development. Conversely, the assessment considers further long distance views where identified and relevant.

## SITE VISIT

2.5 A site survey of the baseline situation was undertaken by Montagu Evans during Summer 2019 to understand the immediate setting of the Site and to identify the townscape character and appearance.

## ASSESSMENT PROCESS FRAMEWORK

### HERITAGE

2.6 The term 'heritage asset' is used within this assessment to describe both designated (e.g. Listed Buildings, Registered Park and Garden, Registered Battlefield or Conservation Area) or non-designated (identified by the local authority e.g. building of townscape merit etc) assets. For the purposes of this HTVIA, built heritage assets do not include archaeological remains.

2.7 Paragraph 189 of the NPPF states:

*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.*

2.8 'Significance' (for heritage policy) is defined in the NPPF (Annex 2) as: *the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.*

2.9 This is reaffirmed by Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015).

2.10 It is commonly agreed that Grade I and II\* buildings are of "exceptional" and "particularly important" interest; therefore these are generally afforded a higher heritage value. This differentiation is best summarised by the drafting of paragraph 189 of the NPPF, which states that the "level of detail (to describe the significance of heritage assets) should be proportionate to the assets' importance"; thus, a grading is appropriate. We have given due and proportionate regard to all heritage assets assessed.

2.11 Where a proposal may have an effect on the surroundings in which the heritage asset is experienced, a qualitative assessment is made of whether, how and to what degree setting contributes to the significance of heritage assets. Setting is defined in the NPPF as: *the surroundings in which a heritage asset is experienced.*

*Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*

2.12 The assessment of setting is informed by the check-list of potential attributes outlined by the Historic England guidance document Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) (hereafter "GPA3: Setting").

2.13 GPA3: Setting identifies five steps towards assessing the implications of development proposals which may affect the setting of heritage assets (it is consistent with other guidance):

1. Identify which heritage assets and their settings are affected;
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;
3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
4. Explore ways to maximise enhancement and avoid or minimise harm; and
5. Make and document the decision and monitor outcomes.

2.14 Part 5 is incumbent on the decision maker, through the provision of conditions.

## TOWNSCAPE AND VISUAL

2.15 The framework for assessment of townscape and visual impact has been prepared using the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) ('GLVIA3'). We have also had regard to the methodology set out in An Approach to Landscape Character Assessment (2014) prepared by Natural England.

2.16 The two components of TVIA are:

1. Assessment of townscape effects: assessing effects on the townscape as a resource in its own right; and
2. Assessment of visual effects: assessing effects on specific views and on the general visual amenity experienced by people.

**TOWNSCAPE**

- 2.17 Townscape is the “built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces”, as defined in GLVIA3.
- 2.18 An initial assessment defined distinct and recognisable patterns of elements, or characteristics that make one area different from another, rather than better or worse. This process, defined as townscape character assessment, is the process of identifying and describing variation in the character of townscape.
- 2.19 The assessment was informed by both field survey and desk based research of secondary sources, with reference to existing character assessments where applicable. The assessment allowed the description of character areas/types, their key characteristics and for them to be mapped with boundaries. The mapped boundaries suggest a sharp change from one townscape area. On site, however, this often represents a zone of transition. Townscape character areas are identified and assessed according to their built form, materials, maintenance, and statutory and non-statutory designations.
- 2.20 The objective of identifying the existing context is to provide an understanding of the townscape in the area that may be affected – its constituent elements, its character and the way this varies spatially, its geographic extent, its history, its condition, the way the townscape is experienced and the value attached to it.

**VISUAL**

- 2.21 Visual impact assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features.
- 2.22 The aim of the visual baseline is to establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.

- 2.23 The baseline study identifies individuals and/or defined groups of people within the area who will be affected by changes in the views, ‘visual receptors’. The following visual receptors are identified by GLVIA3 as being likely to be the most susceptible to change:
  - Residents at home;
  - People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;
  - Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
  - Communities where views contribute to the landscape setting enjoyed by residents in the area.
- 2.24 It should be noted that the assessment does not comprise a ‘residential amenity assessment’, which considers private viewpoints from residential properties. This is separate from townscape and visual assessment (refer to GLVIA3, paragraph 6.17).
- 2.25 Assessment viewpoints were identified based on a comprehensive review of the surrounding area, including the following criteria:
  - Heritage assets; and/or
  - Townscape character; and/or
  - Where the development may be prominent; and/or
  - Be visible from concentrations of residential areas; and/or
  - Open spaces (parkland, publicly accessible space); and/or
  - Potentially sensitive receptors (e.g. schools); and/or
  - Accessibility to the public; and/or
  - The viewing direction, distance and elevation; and/or
  - Townscape and transport nodes.
- 2.26 The Site is not located within any strategic views as determined by the adopted London View Management Framework (LVMF) (2012).
- 2.27 The visual assessment is carried out in two parts. The closer views of the scheme are considered with reference to the CGIs and images prepared by the design team at Hunters. These are discussed in Section 9, along with the heritage assessment of the scheme.

- 2.28 The other part of the visual assessment is carried out with a short suite of Accurate Visual Representations (AVRs), which provide the basis for the assessment of the Proposed Development and its effect on the identified views from long distance locations. Those viewpoints are reproduced at **Section 8.0** in the following formats:
  - **Existing** – baseline photography; and
  - **Proposed** – ‘existing’ plus wire line (AVR1) or render (AVR3) of the Proposed Development.
- 2.29 The methodology for the compilation of AVRs prepared by Hayes Davidson is provided at **Appendix 1.0**.
- 2.30 The objective of a photomontage is to simulate the likely visual changes that would result from a proposed development, and to produce printed images of a size and resolution sufficient to match the perspective in the same view in the field.
- 2.31 Accurate visual representation is two-dimensional and cannot capture the complexity of the visual experience. It is an approximation of the three-dimensional visual experience the observer would receive on site. Neither do they capture transient significant effects arising from noise or traffic on perception, or that wider range of expectations and associations that anyone in an urban scene may have. A visit to the location from which the photographs were taken is strongly encouraged to appreciate and understand the visual impact.
- 2.32 The text accompanying each view seeks to contextualise it. Inevitably one must accept that judgement is involved in this specialist area on the basis of the above and the importance of design quality in the operation of policy. In preparing any written assessment, allowances are made for these factors as well as the assessor’s knowledge of the scheme.



**3.0**

# **LEGISLATION AND PLANNING POLICY**

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# LEGISLATION AND PLANNING POLICY

3.1 This section sets out the planning policy context for the redevelopment of the Site, including national and local guidance.

## LEGISLATION

### PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS ACT) 1990

3.2 The Site does not comprise any statutorily listed building and is not located in a conservation area.

3.3 With respect to this application, the applicable statutory provisions are:

- Section 66(1) Sets out the general duty as respects listed buildings in exercise of planning functions. This section of the Act requires the decision maker to: *'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'*

### NATIONAL PLANNING POLICY FRAMEWORK (NPPF) 2019

3.4 Chapter 12 of the NPPF outlines the Government's policy regarding design. It emphasises that "good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people".

3.5 Paragraph 127 states that design:

- "a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

3.6 Paragraph 130 advises that planning decisions should:

*"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development."*

3.7 Paragraph 131 promotes sustainable development and appropriate design:

*"In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."*

3.8 Chapter 16 of the NPPF sets out the Government's policies relating to the conservation and enhancement of the historic environment. In determining planning applications, Paragraph 189 specifies that:

*"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."*

3.9 Paragraph 193 states that:

*"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

3.10 Paragraphs 194 and 195 provide a definition and the approach to substantial harm. Paragraph 196 has regard to less than substantial harm. It states that:

*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

3.11 Paragraph 197 states that:

*"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

3.12 Paragraph 200 of the NPPF states that local planning authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

### NATIONAL PLANNING PRACTICE GUIDANCE (NPPG) (ONLINE) (DCLG)

3.13 This guidance was published as a web based resource on 6 March 2014. In preparing Local Plans and taking decisions, local planning authorities need to consider and have regard to planning practice guidance issued by the Government.

3.14 The guidance states that to support economic, social and environmental objectives, the following design issues should be considered:

- local character (including landscape setting)
- safe, connected and efficient streets
- a network of greenspaces (including parks) and public places
- crime prevention
- security measures
- access and inclusion
- efficient use of natural resources
- cohesive & vibrant neighbourhoods

Paragraph: 006 Reference ID: 26-006-20140306. Revision date: 06 03 2014

3.15 With regard to managing physical form the guidance states that the following should be considered:

- layout – the way in which buildings and spaces relate to each other
- form – the shape of buildings
- scale – the size of buildings
- detailing – the important smaller elements of building and spaces
- materials – what a building is made from

Paragraph: 023 Reference ID: 26-023-20140306. Revision date: 06 03 2014

3.16 In regard to the setting of a heritage asset and how should it be taken into account during the assessment of new development, the guidance states:

*"A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.*

*Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.*

*The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust 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 or an ability to access or experience that setting. This will vary over time and according to circumstance.*

*When assessing any application for development 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."*

Paragraph: 013 Reference ID: 18a-013-20140306. Revision date: 06 03 2014

## DEVELOPMENT PLAN

3.17 Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that where in making any determination under the Planning Acts, regard is to be had to the development plan, and the determination must be made in accordance with that plan unless material considerations indicate otherwise. The following documents form the statutory development plan, and which are relevant to the heritage and townscape considerations at the Site:

- London Plan (2021)
- Development/Core Strategy DPD (2012)
- Development Sites DPD (2013)
- Development Management DPD (2013)

## LONDON PLAN (MARCH 2021)

3.18 The following policies of the London Plan are relevant to the assessment of heritage, townscape and visual impact effects.

- Policy D1 (London's form character and capacity for growth);
- Policy D3 (Optimising site capacity through the design-led approach);
- Policy D4 (Delivering good design);
- Policy D5 (Inclusive design);
- Policy D8 (Public realm);
- Policy D9 (Tall Buildings);
- Policy HC1 (Heritage conservation and growth); and
- Policy HC3 (Strategic and Local Views).

## LONDON BOROUGH OF EALING DEVELOPMENT STRATEGY 2026 DEVELOPMENT PLAN DOCUMENT (LBE, 2012)

3.19 Policy 1.1 (Spatial Vision for Ealing 2026) states:

*"(h) To care for the borough's historic character and enhance the significance of heritage assets in regeneration proposals, ensure excellence in urban design and design out crime to make Ealing's environment safe, attractive and accessible for all."*

## LONDON BOROUGH OF EALING DEVELOPMENT MANAGEMENT DPD (LBE, 2013)

3.20 Policy 7.B Ealing Local Policy – Design Amenity encourages new development to achieve a high standard of amenity for users by ensuring that the new developments are of the following, as stated in part A of the policy:

- high quality architecture
- good levels of daylight and sunlight
- good levels of privacy
- coherent development of the Site
- appropriate levels of development on Site
- positive visual impact
- legibility and accessibility

3.21 Policy 7C: Ealing Local Policy- Heritage states that:

*"A Development of heritage assets and their settings should: Be based on an analysis of their significance and the impact of proposals upon that significance; Conserve the significance of the asset in question; Protect and where appropriate restore original or historic fabric;*

*Enhance or better reveal the significance of assets.*

*C The significance of heritage assets should be understood and conserved when applying sustainable and inclusive design principles and measures.*

*D Harm to any heritage asset should be avoided. Proposals that seek to cause harm should be exceptional in relation to the significance of the asset, and be clearly and convincingly justified in line with national policy."*

- 3.22 Policy 7.7 Ealing Local Variation– Location and Design of Tall and Large Buildings states:

*“G In addition to the above principles, tall buildings should;*  
*a) accord with the spatial objectives of the Development Strategy in being located on specified Sites within Acton, Ealing and Southall town centres, gateways to Park Royal and identified development Sites;*  
*b) offer an outstanding quality of design;*  
*c) make a positive and appropriate contribution to the local context and the broader area on which they impact;*  
*H Tall buildings are defined as those that are substantially taller than their neighbours and/or which significantly change the skyline.”*

### DEVELOPMENT SITES DEVELOPMENT PLAN DOCUMENT (2013)

- 3.23 Policy SOU8 (The Green) allocates an area of land which comprises the Site for:

*“Mixed use development appropriate to the town centre, with continued protection of existing industrial uses on the Featherstone, Domunion and Suterwalla estates as a Locally Significant Industrial Site (LSIS) and retention of the Dominion Arts Centre.*  
*The site contains a wide variety of comparatively low density uses and an underused surface level car park. Consolidation and intensification of the site will allow retention of the locally important industrial uses and support the introduction of new uses to support the vitality and viability of the neighbourhood centre.”*

## MATERIAL CONSIDERATIONS

### NATIONAL PLANNING POLICY FRAMEWORK (NPPF) 2019

- 3.24 Chapter 12 of the NPPF outlines the Government’s policy regarding design. It emphasises that *“good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.*
- 3.25 **Paragraph 127** states that design:
- “a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
  - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
  - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
  - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
  - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

- 3.26 **Paragraph 130** advises that planning decisions should:

*“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.”*

- 3.27 **Paragraph 131** promotes sustainable development and appropriate design:

*“In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”*

- 3.28 Chapter 16 of the NPPF sets out the Government’s policies relating to the conservation and enhancement of the historic environment. In determining planning applications, Paragraph 189 specifies:

*“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.”*

- 3.29 The emphasis is on understanding what is special about a heritage asset, and by extension, identifying those elements which are capable of accepting change without harm to the special heritage values of a place.

- 3.30 Where developments affect the significance of a designated heritage asset, **paragraphs 193 to 196**, and **200** of the NPPF are engaged.

- 3.31 **Paragraph 193** states:  
*“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
- 3.32 This corresponds with the statutory provisions set out in the 1990 Act and which were clarified in Barnwell.
- 3.33 Where a proposal takes the opportunity to enhance or better reveal the significance of a designated heritage asset then **paragraph 200** applies:  
*“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”*
- 3.34 Conversely, where development is deemed to cause harm, one must demonstrate the works have clear and convincing justification, and, furthermore, that harm is offset in some way proportionately by countervailing public benefits. That harm would, nevertheless, attract great weight in planning balance.
- 3.35 In national policy, **paragraph 195** of the NPPF refers to “substantial harm”, which is a high test tantamount to total demolition such that the special interest of the designated heritage asset is vitiated. Substantial public benefits would be required to offset this level of harm, though there would be a strong presumption against granting listed building consent or planning permission.
- 3.36 **Paragraph 196** refers to “less than substantial harm” which practically applies to most areas where harmful works take place to a designated heritage asset. In this case, that harm would be weighed against public benefits.
- 3.37 With clear and convincing justification, and providing a clear set of public benefits, the Council would be able to discharge its legal obligations under 66 (1). Without it, then an authority may well be acting contrary to its legal duties.
- 3.38 Annex 2 of the NPPF defines heritage assets as buildings, monuments, sites, places, areas or landscape that are identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest. Heritage assets include designated heritage assets and non-designated heritage assets (NDHAs), which are often but not always identified by the local planning authority.
- 3.39 The NPPF defines “significance” and makes clear that heritage interest may arise from archaeological, architectural, artistic or historic interest.
- 3.40 The NPPF indicates that in weighing planning applications affecting NDHAs, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (paragraph
- 3.41 In forming a balanced judgement required by **paragraph 197** of the NPPF, the decision maker must also have regard to the design quality of the replacement development.
- 3.42 In addition to legislation and policy, the assessment will take into consideration relevant planning guidance and any material considerations, including:
- National Planning Practice Guidance (online);
  - Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013);
  - An Approach to Landscape Character Assessment (2014);
  - Photography and photomontage in landscape and visual impact assessment: Landscape Institute Advice Note 01/11;
  - Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015)
  - Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017);
  - Tall Buildings: Historic England Advice Note 4 (2015).



**4.0**

# **HISTORIC DEVELOPMENT**

**THE GREEN, SOUTHALL**

# HISTORIC DEVELOPMENT

4.1 This section provides a description of the historic development of the Site and that of the surrounding area.

4.2 The section and **Section 5.0** has been informed by secondary sources, including:

- The Buildings of England, London 3: North West, Cherry and Pevsner (1999);
- A History of the County of Middlesex: Volume 4: Harmondsworth, Hayes, Norwood with Southall, Hillingdon with Uxbridge, Ickenham, Northolt, Perivale, Ruislip, Edgware, Harrow With Pinner, Victoria County History (1971) accessed via British History Online [http://www.british-history.ac.uk/vch/middx/vol4/pp43-45]
- Ealing Local Studies Archives

## EARLY HISTORY

4.3 The name Southall has an Anglo-Saxon root, meaning ‘at the south of the land or wood’. The earliest known reference to the area dates from 825AD, when the land around Southwall was bequeathed to the Archbishopric of Canterbury by a relative of Archbishop Wulfred (d. 832). In 1212, William de Suhalle held ‘a knight’s fee’ of the land (sufficient area to support a knight in pursuit of his feudal duties).

4.4 By 1316, the Manor of Southall had been added to the Elthorne Hundred, which was described in the Domesday Book (1086) as having 224½ hides and being made up of 13 Manors. By 1361, it was under the ownership of Sir Richard de Stanley, before passing to John Shoredych Esquire in the later 14th to mid-15th century.

4.5 During the turbulent years of the Wars of the Roses (1465–1487), the Manors of Southall and adjacent Norwood changed hands a number of times as political power passed back and forth between the supporters of the warring houses of Lancaster and York. Southall finally passed to Francis Awister, who built the present Southall Manor House, which is believed to date from 1587 (**Figure 4.2**).



Figure 4.1 Rocque's Map of 1746

4.6 The Awister family held the manor until 1754, when it was sold to nearby Osterley. Whilst the Site itself is not shown in Rocque’s Map of 1746 (see image), the agrarian character of the surrounding area can be understood from the field boundaries to the south east. The Southall area was described in 1795 as having “33 [houses] in the hamlet of Southall Green and 56 in that of Northcott, alias Southall, which lies upon Uxbridge Road, about a mile from Norwood Chapel.”



Figure 4.2 Southall Manor House (undated image, Ealing Local Studies Archive)

## OSTERLEY PARK

4.7 Osterley Park is shown in Rocque’s Map of 1746, and was the Site of an Elizabethan Manor House constructed in the 1570s for Sir Thomas Gresham, a banker who had purchased the Manor of Osterley in 1562. Following a mortgage default, the house was at risk of dilapidation when it was acquired by Sir Francis Child in the 1760s, and Robert Adam was appointed to remodel the house.

4.8 The Grade I listed property is now run by the National Trust along with its extensive grounds which are designated as a Grade II\* Registered Park and Garden.

## DEVELOPMENT OF INFRASTRUCTURE AND INDUSTRY

4.9 The Grand Junction Canal was opened in 1796, and facilitated easy and safe freight transport between London and Birmingham. The canal led to significant industrial development in the Southall area which was later augmented d by the Great Western Railway. Southall Railway Station was opened on May 1st 1839, on its London Paddington to Maidenhead line, improving passenger transport and decreasing travel times to and from central London (see British Library image). This led to the development of previously rural areas with residential and industrial buildings.

**1878-1880 OS MAP**

- 4.10 The 1878-1880 OS Map shows that the settlement of Southall was focussed on the linear route of The Green. The area immediately east and west of the road, and south of the railway line is shown planted as orchards, with 'Southall Green' labelled to the west of the Manor House. The gardens of the Manor House are shown, with a tree lined boundary to the road.
- 4.11 To the south-west of the Site was some industrial development, labelled as a brick works. The area to the north of the railway line was predominantly arable in character.

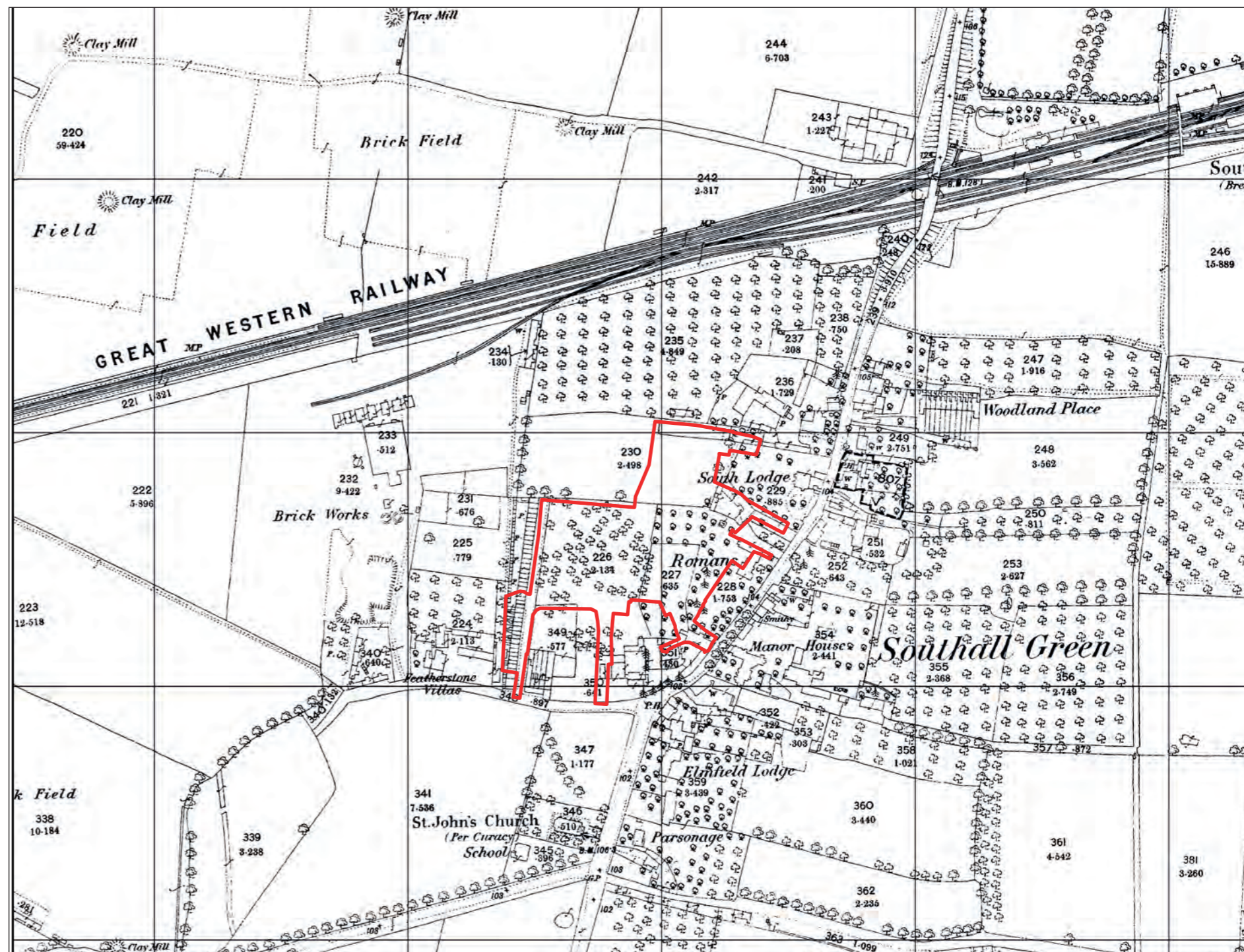


Figure 4.3 1878-1880 OS

1935 OS

- 4.12 Significant development had taken place in the period between 1880 and 1935. The formerly open land and orchards shown at **Figure 4.3** had been replaced with rows of terraced houses, arranged in straight lines on a grid pattern.
- 4.13 At the Site, an irregular range of industrial buildings are shown, including the Magdala Works, a well-boring facility, and the western foundries. The arrangement of buildings is less regular and comparatively loose; placed to take advantage of the adjacent railway sidings, allowing easy transportation of goods.

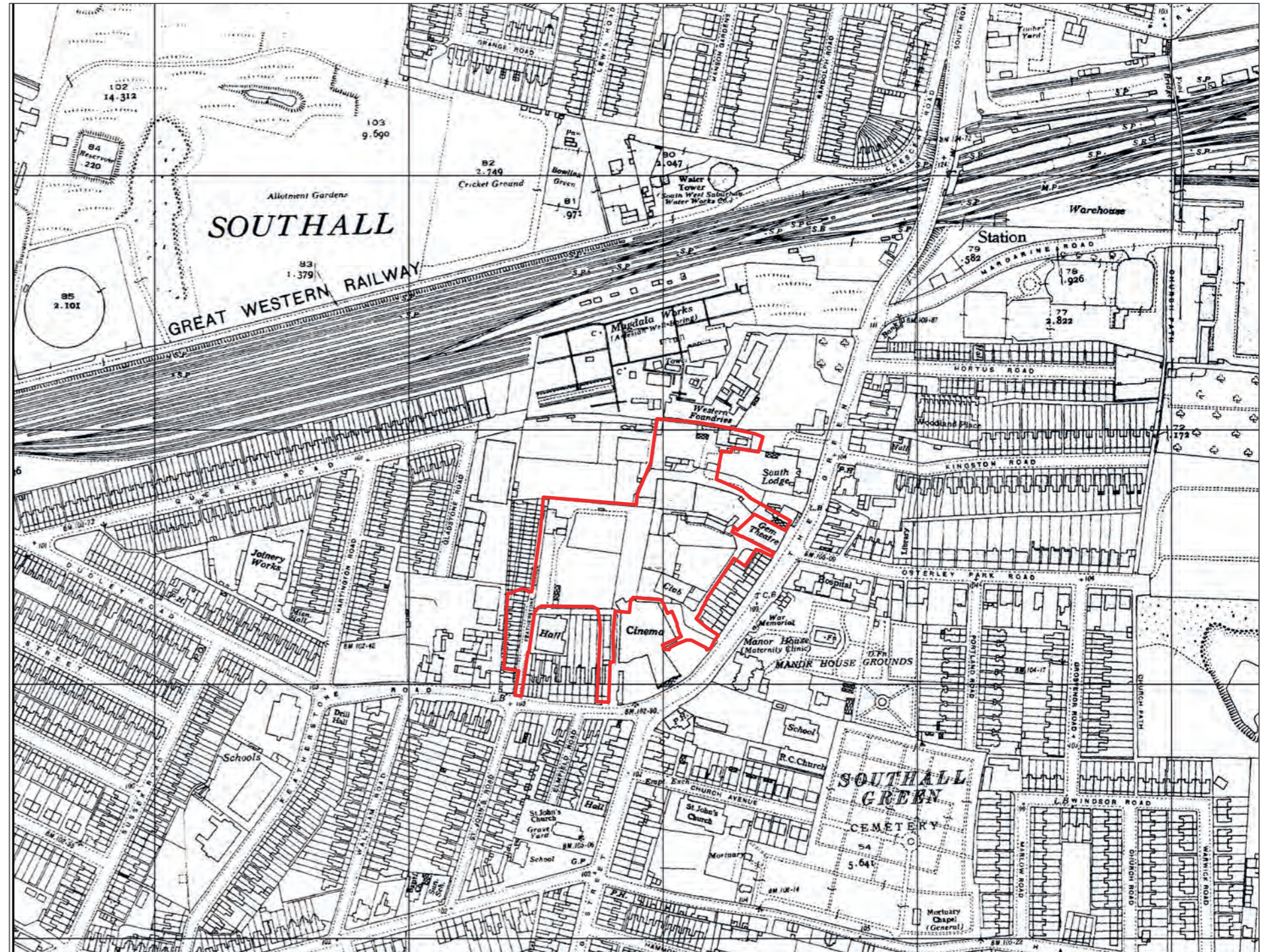


Figure 4.4 1935 OS

**1962-1964 OS**

- 4.14 By 1962, the arrangement of the town remained broadly similar to that in the 1930s. In the environs of the Site, a larger number of buildings are shown, irregularly arranged and labelled simply as 'works'. A large building, labelled the Dominion Theatre, is shown on the north side of The Green, with a wider frontage than the adjacent buildings.
- 4.15 The formal arrangement of the Manor House and grounds is also shown, alongside the Southall War Memorial, on the south side of The Green.

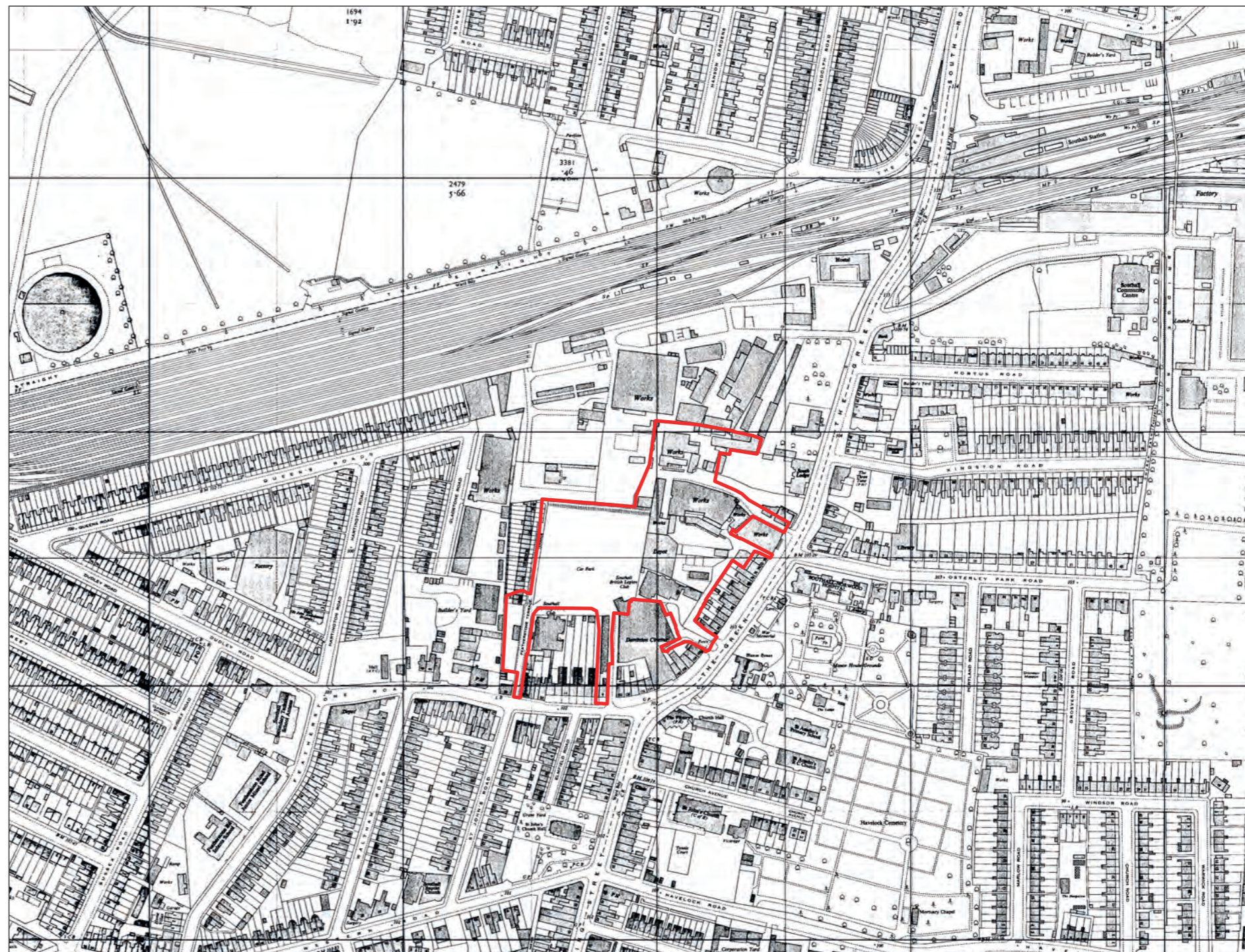


Figure 4.5 1962-1964 OS

**1985 OS**

- 4.16 This arrangement persisted into the 1980s, with a range of industrial buildings arranged around the rectangular car park in the core of the curved space north of The Green.
- 4.17 The arrangement of residential terraces remained unchanged.
- 4.18 The broad structure of the street scene remains substantially similar to that shown on the historic maps; the townscape is intersected east-west by the railway line, with substantial areas of fine-grain residential development, and an area of irregular industrial-style buildings to the north of The Green.

**SECTION SUMMARY**

- The Manor of Southall formed part of the Elthorne Hundred in 1316.
- Francis Awister built the present Southall Manor House in 1587. The Awister family held the manor until 1745.
- In 1795, Southall had 56 houses at Northcott and 33 at Southall Green development.
- Following the establishment of the Grand Junction Canal in 1796, considerable industrial development took place, augmented later by the Great Western Railway. Southall Station opened in 1839.
- The linear route of The Green formed a focus of in the first OS. Over the late 19th and into the 20th centuries, the Site and its environs were developed with a range of industrial structures to exploit the nearby railway.
- This character persists, with a number of functional structures at the Site, set back from the principal frontage to The Green.

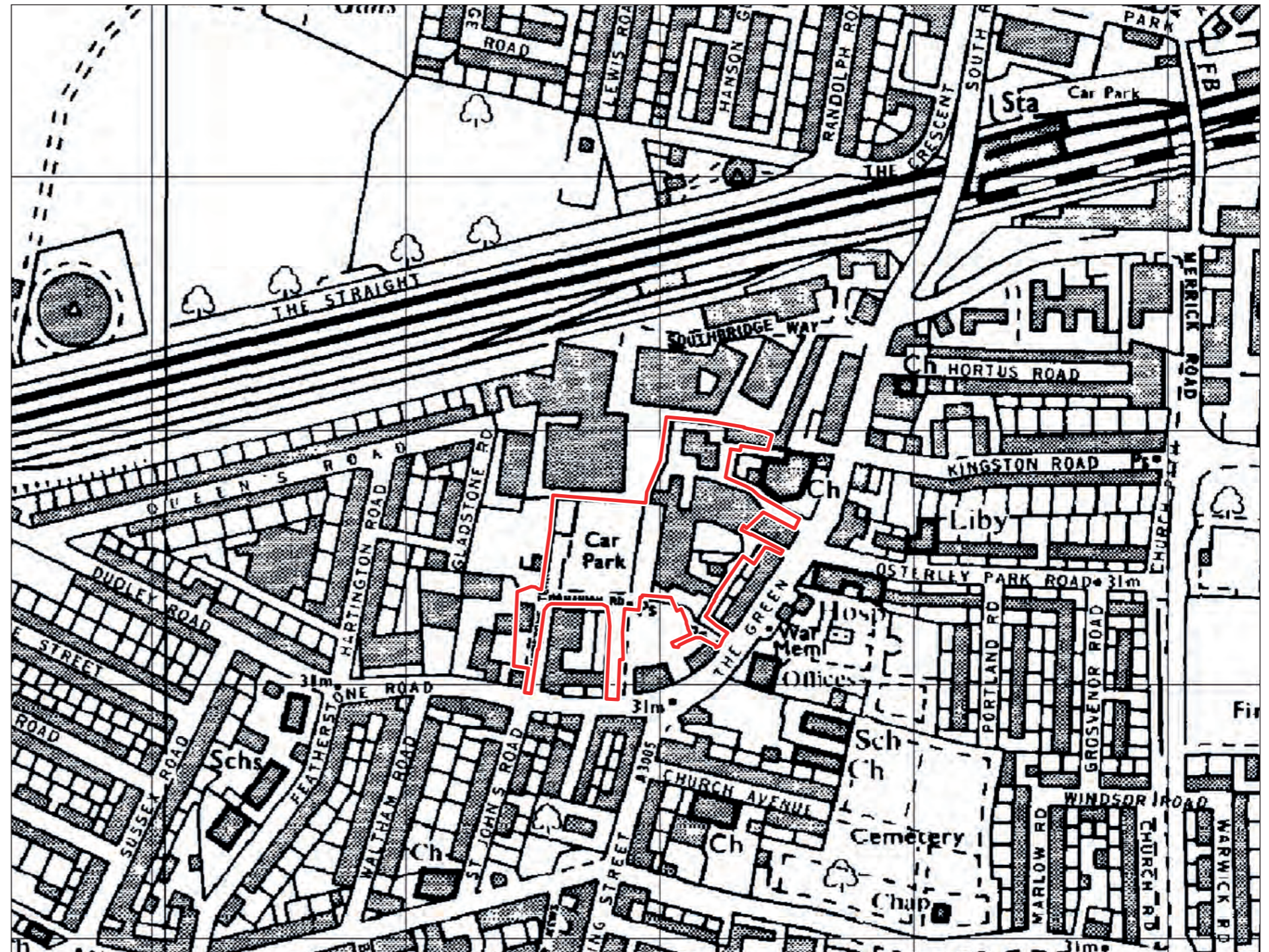


Figure 4.6 1985 OS

**5.0**

# **ASSESSMENT OF HERITAGE ASSETS' SIGNIFICANCE**

**THE GREEN, SOUTHALL**

# ASSESSMENT OF HERITAGE ASSETS' SIGNIFICANCE

- 5.1 The identification of heritage assets has been based on the methodology set out in **Section 2.0**. The search included all listed buildings, conservation areas, registered parks and non-designated heritage assets within the study area. Professional judgement has been used to select those which may experience change to their setting.
- 5.2 The heritage assets are identified below with a short description. The location of these heritage assets are identified in the Heritage Asset Map at **Figure 5.1**.
- 5.3 In the context of the definition of setting offered in the Framework, (which advises this is 'surroundings in which a heritage asset is experienced'), this defines the setting of heritage assets in very broad terms. Indeed, such a broad scope means that many development proposals may be held to come within the setting of a heritage asset. Most would agree however that aside from some generic inter-visibility, a great number of such proposals could not reasonably be held to engage with or alter the setting of heritage assets in a material way.
- 5.4 Owing to the nature and the height of the Proposed Development, the prevailing height of other buildings in the surrounding area, and the screening provided by the existing building forms, the effect on the setting of some built heritage assets is restricted. For the purposes of this HTVIA therefore professional judgement has been used to select those built heritage assets that are likely to experience change to their setting, and by extension, their heritage significance. Those assets that are both physically and functionally separated from the Site have not been assessed as the heritage significance of these assets is unlikely to be affected. Those assets are identified in **Table 5.1**.

# HERITAGE ASSET PLAN

 Application Site

Listed Buildings

**Grade II\***

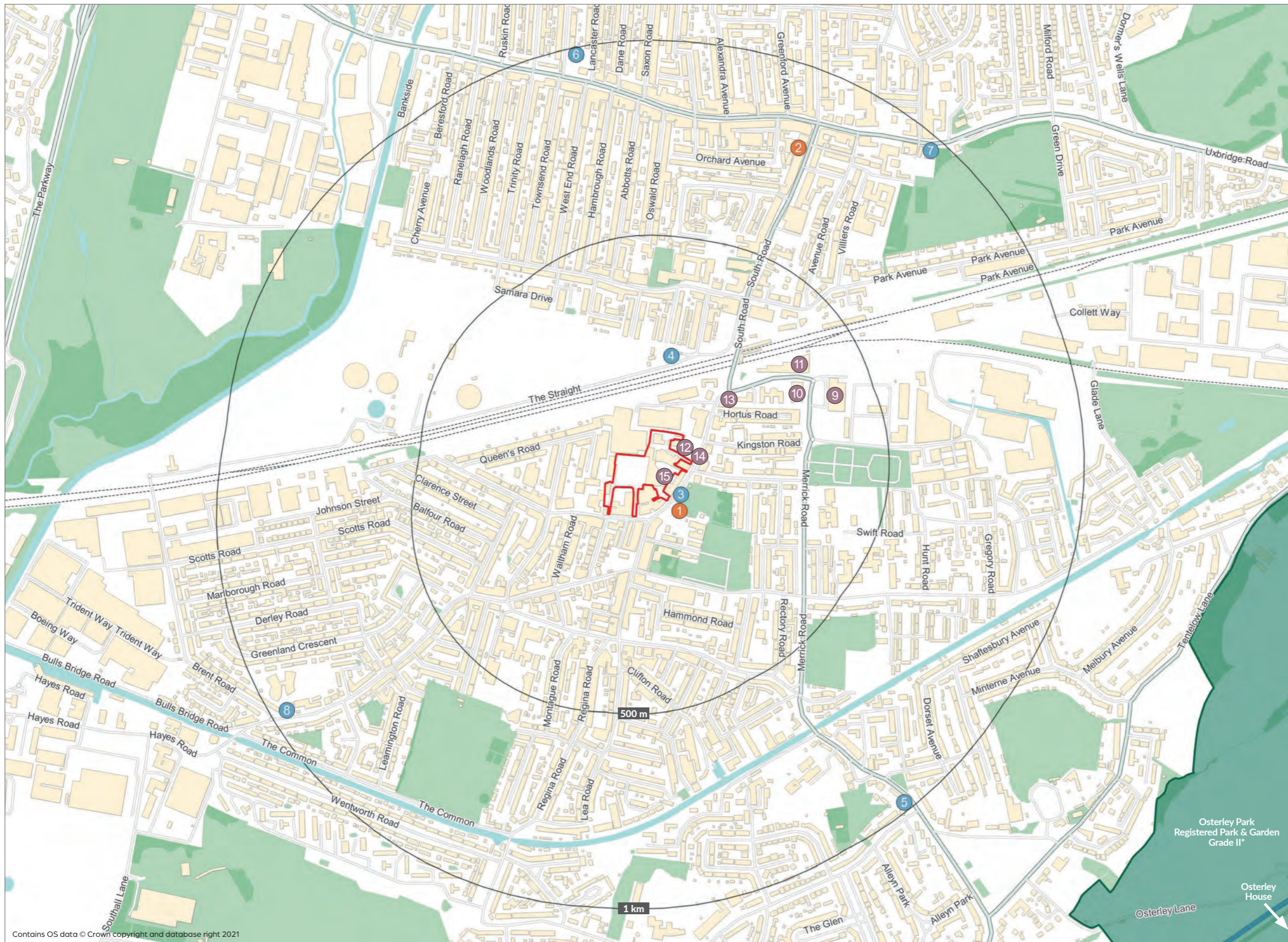
1. Southall Manor House
2. Liberty Cinema

**Grade II**

3. Southall War Memorial
4. The Water Tower
5. 196 and 198, Norwood Road
6. Church of St George
7. Red Lion Public House
8. Featherstone Boys School War Memorial

**Locally Listed**

9. Sunrise Radio Building
10. Southall Community Centre
11. Railway Arches
12. St Anselm's Church
13. 13-15 The Green
14. Cattle Trough outside no. 55 The Green
15. Stables and Coach House



Contains OS data © Crown copyright and database right 2021

**LOCATION:**  
The Green, Southall

**DATE:**  
October 2021

**SCALE:**  
1:10,000 @ A3

**FIGURE 5.1** Heritage Asset Map

 **NORTH**



**MONTAGU EVANS**  
CHARTERED SURVEYORS  
70 ST MARY AXE TOWER,  
LONDON, EC3A 8BE  
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**LISTED BUILDINGS**

**SOUTHALL MANOR HOUSE (GRADE II\*)**

- 5.5 Southall Manor House was added to the statutory list in 1949.
- 5.6 The building forms a late 16th century manor house, partially dated to 1587, which was built by Francis Awister. It has undergone later alterations in the 18th, 19th and 20th centuries. It has five bays to the front elevation, a first floor jetty, and some original windows dated 1587.
- 5.7 The building has historic and architectural interest as a good example of a late 16th century hall and cross wing plan house, with later alterations, and as part of the historic streetscape in this part of Southall.



Figure 5.2 Southall Manor House

**SOUTHALL WAR MEMORIAL (GRADE II)**

- 5.8 Southall War Memorial was added to the statutory list in 2016.
- 5.9 The memorial was designed by James Thomson, Council surveyor, and constructed by Southall Masonry Company. It forms a Portland stone cenotaph, unveiled in April 1922.
- 5.10 The memorial has historic and architectural (design) interest as a commemorative memorial associated with the First World War.

**CONTRIBUTION OF SETTING TO HERITAGE VALUE**

- 5.11 These assets are situated within the main town centre at Southall. Their setting can be described in two parts – north and south – intersected by the linear route of The Green, a busy traffic thoroughfare through the area towards Southall Station to the north.
- 5.12 To the south and east of the heritage assets is the public open space of Manor House Grounds, formerly part of the land associated with the Manor House, which provides relief from the urban environment with open lawns and mature trees, and makes a positive contribution to the buildings' setting.
- 5.13 Immediately north of the Manor House is an access route into the Site. It has an irregular, back-of-house character with blind frontages, gates and walls, and bin storage, contributing to an unattractive appearance.
- 5.14 These areas to the north make a lesser contribution to the setting of the assets, however, as these are best appreciated in views south and east. The area to the north of the road has a different character, and is understood separately by the visitor.
- 5.15 Built form in the setting of the building is mixed, and reflective of the piecemeal development of the area. To the north and west, The Green is lined with a continuous line of homogenous development, predominantly comprised of 2-3 storey buildings with shop fronts at ground floor. These define the extent of the immediate setting as experienced from the street.
- 5.16 The wide pavement on the east side of The Green adjacent to the memorial allows for their appreciation, and contributes to the setting of the listed buildings. The eastern elevation of the Manor House, in particular, can be appreciated from this vantage point, and the attractive brick diapering appreciated.

**LIBERTY CINEMA (GRADE II\*)**

- 5.17 The cinema was added to the statutory list in 1980.
- 5.18 The cinema was constructed in 1928 to designs by George Coles, and forms the only example of a cinema built in the Chinese style. Its front elevation is faced with glazed tiles, and red pan tiled pagoda roofs, with a brick construction behind. Much of the original interior remains, including dragon moulding to corner, geometric panels and a Chinoiserie ventilation grille to the auditorium. The building has since been adapted for use as a market hall.



Figure 5.3 Southall War Memorial



Figure 5.4 Liberty Cinema

5.19 The cinema has historic and architectural interest as a Chinese-style building used as a cinema, and as part of the historic streetscape in this part of Southall.

#### CONTRIBUTION OF SETTING TO HERITAGE VALUE

5.20 The former cinema is situated on the east side of South Road, one of the main routes through Southall, adjacent to Southall Station.

5.21 The busy retail frontages along the road contribute to a high pedestrian footfall past the receptor. The wide range of advertising and market-type retail on the street is a distracting element in the setting of the building, which detracts from the appreciation of its historic façade.

5.22 The wider setting comprises the urban development of Southall, and makes a positive contribution to the understanding of the building as a former local cinema.

5.23 The Site does not contribute to the setting of the cinema, or its heritage value.

#### THE WATER TOWER (GRADE II)

5.24 The Water Tower was added to the statutory list in 1972.

5.25 The tower dates from the late 19th century, and forms a hexagonal tower built in red brick with four stages and a battlemented parapet.

5.26 The building has historic and architectural interest as a good example of a late 19th century water tower, and as a remnant of the early sanitary infrastructure in the area.

#### CONTRIBUTION OF SETTING TO HERITAGE VALUE

5.27 The water tower is one of the taller features in Southall, and thus can be appreciated from a wide area. It is a landmark visible from the canal path, and the country park from the north.

5.28 The setting of the tower within Southall makes a positive contribution to the appreciation of its associative function, as part of the water infrastructure of the historic settlement.

5.29 The immediate setting of the tower comprises an undeveloped brownfield open space, which has been in use for car parking. To the west is a gas works, with a prominent gas holder which is larger in scale than the water tower.

5.30 The setting of the water tower makes a mixed contribution to its appreciation and heritage value.

#### 196 & 198, NORWOOD ROAD (GRADE II)

5.31 This receptor was added to the statutory list in 1981.

5.32 The building comprises a pair of late 18th century houses in brown brick with an old tile roof, set over three storeys. They have double-hung sashes set in reveals, and yellow brick flat gauged arches.

5.33 The building has historic and architectural interest as a good example of a pair of 18th century houses, and as a remnant of the early streetscape in the area.

#### CONTRIBUTION OF SETTING TO HERITAGE VALUE

5.34 This building is situated close to Norwood Green, which has a village green character, surrounded and overlooked by houses. Some other listed buildings are situated in close proximity, though these fall outwith the study area. This setting creates the sense of a historic settlement, of which the listed buildings are each a constituent part, and contribute to the sense of the whole.

5.35 To the north and east of the building, the wider setting comprises the more recent residential development of Southall, which makes a neutral contribution to their setting. Tentelow Lane and the A3005 are busy traffic routes in the setting of the assets, which do not contribute to their appreciation or heritage value.

5.36 The Site does not contribute to the heritage value, or appreciation thereof, of the listed building.



Figure 5.5 The Water Tower



Figure 5.6 196 and 198 Norwood Road

**RED LION PUBLIC HOUSE (GRADE II)**

- 5.37 The Red Lion Public House was added to the statutory list in 1981.
- 5.38 The building dates from the late 18th/ early 19th century, and comprises a three storey building with brown and yellow stock brick facing and a stucco ground storey.
- 5.39 The building has historic and architectural interest as a good example of a late 18th/ early 19th century public house, and as a remnant of the early streetscape in this part of Southall.

**CONTRIBUTION OF SETTING TO HERITAGE VALUE**

- 5.40 This building is situated in the centre of Southall, close to the public open space at Southall Park.
- 5.41 The busy, town centre setting of the receptor contributes to the understanding of the building as a local public house. The adjacent open space to the west allows for the appreciation of the form of the historic building.
- 5.42 There is a large car park to the rear (south) of the receptor which is an unattractive feature in its setting, and the observer is aware of heavy traffic moving along the A4020, which detracts from the appreciation of the building.
- 5.43 The Site does not contribute to the heritage value, or appreciation thereof, of the heritage asset.

**CHURCH OF ST GEORGE (GRADE II)**

- 5.44 The Church of St George was added to the statutory list in 1981.
- 5.45 The Church was built to designs by Arthur Conran Blomfeld between 1907 and 1908. It has a stock brick exterior with red brick and Bath stone dressings, in an Arts and Crafts influenced Gothic style. Its organ dates from 1723, and was originally built by Abraham Jordan Junior for St George's Boltoph Lane, in the City of London.
- 5.46 The church has historic and architectural interest as an attractive, Edwardian church by a known architect, and as part of the early 20th century development in this part of Southall.

**CONTRIBUTION OF SETTING TO HERITAGE VALUE**

- 5.47 The Church of St George is situated at the juncture of a predominantly residential area at the north east of Southall town centre, and the busy commercial frontages along The Broadway.

- 5.48 The setting of the church to the north comprises terraced and semi-detached houses with a linear arrangement on a north-south axis, which screens distant views towards the church.
- 5.49 To the south, the setting includes unsympathetic modern development such as a McDonald's with a large car park to the building's immediate south. These detract from the appreciation of the historic church, and is an unattractive feature in its setting.
- 5.50 The setting of the church does not make a positive contribution to its appreciation or heritage value.
- 5.51 There is no historic or functional associations between the Church and the Site, and the two are visually separate. The Site makes no contribution to the heritage value or appreciation of the asset.

**FEATHERSTONE BOYS SCHOOL WAR MEMORIAL (GRADE II)**

- 5.52 The Featherstone Boys School War Memorial was added to the statutory list in 2018, and comprises a sculpture by John Tweed and design by William Thomas Curtis FRIBA, memorialising old boys of the school who list their lives in the First World War. It was erected in 1921, and has a bronze figure of a soldier atop a three-part canted limestone wall.
- 5.53 The memorial possesses historic and architectural interest as a good example of a 1920s war memorial by a known architect and sculptor.

**CONTRIBUTION OF SETTING TO HERITAGE VALUE**

- 5.54 The memorial has a contained setting within the forecourt of Featherstone Primary School, with which it shares a strong historic connection. The planted open space within the school entrance allows for the appreciation of the memorial.
- 5.55 The townscape beyond the school fences does not meaningfully contribute to the setting of the memorial, which is associated primarily with the school.
- 5.56 The memorial does not have any historic or functional associations with the Site, and the two are visually separate. The Site makes no contribution to the heritage value or appreciation of the memorial.



Figure 5.7 Church of St George



Figure 5.8 Featherstone Boys School War Memorial

## LOCALLY LISTED BUILDINGS

### SUNRISE RADIO BUILDING

5.57 The Sunrise Radio building is situated within the Site of an emerging development at the former Otto Monsted Margarine Works. It is a tall brick building with a metal frame.

5.58 The building has some local historical value as part of the Monsted works complex, and for its association with Sunrise Radio. The building is identified as a locally listed building in the LBE planning policy proposals map. The LBE describes the locally listed building as follows: 'Sunrise Radio Building: Tall building of robust but decorative brick and metal frame, part of a larger complex of Victorian industrial buildings known as The Margarine Factory opened by Otto Monsted in 1893 once on Margarine Road then Bridge Road.'

### SOUTHALL COMMUNITY CENTRE & GATEWAYS ON EAST SIDE OF MERRICK ROAD

5.59 Southall Community Centre is a 1910 Beaux Arts style building by A Marshall Mackenzie. It is located to the east from the Site, along Merrick Road.

5.60 The building is part of the Monsted Margarine Works complex, and was formerly known as 'The Institute'. It has some local historical value as part of the Monsted works complex.

### CONTRIBUTION OF SETTING TO HERITAGE VALUE

5.61 The setting of these buildings comprises the former industrial Site to the north and east, contained within the railway line to the north.

5.62 The buildings are set within the Southall Opportunity Area, and therefore a number of areas of its setting are subject to proposals for development, and expected to change in the coming years.

5.63 The surrounding industrial estate detracts from the appreciation of the building, and the restricted access to the rear limits appreciation of its form.

5.64 Both of these buildings sit within a context which is presently emerging through extensive redevelopment. They do not have any historic or functional associations with the Site, and are visually separate.

5.65 The Site makes no contribution to the heritage value or appreciation of the buildings.



Figure 5.9 Sunrise Radio Building

### CATTLE TROUGH OUTSIDE 55 THE GREEN

5.66 The cattle trough comprises a pre-19th century stone cattle trough, which has been re-purposed for planting.

5.67 The cattle trough forms part of the early street furniture in this part of Southall, and therefore has some local interest.

### CONTRIBUTION OF SETTING TO HERITAGE VALUE

5.68 The cattle trough is situated on the east side of The Green, opposite St Anselm's Church and in close proximity to an entrance to the Site.

5.69 The surrounding context makes a limited contribution to the setting of the trough, which is understood as a remnant of an earlier streetscene. Built form in the vicinity is varied in terms of both style and period, and does not make a particular contribution to the appreciation of the cattle trough.

5.70 There is no historic or other association between the Site and the cattle trough.



Figure 5.10 Southall Community Centre and Gateways



Figure 5.11 Cattle Trough outside 55 The Green

## ST ANSELM'S CHURCH

5.71 This building comprises the only Catholic Church in in Southall, which relocated to these premises in the 1960s. The building has a brick exterior with a crucifix atop a modern tower.

### CONTRIBUTION OF SETTING TO SIGNIFICANCE

5.72 The church is set back from the street frontage, within a large car park with steps down to the pavement beyond. The locally listed substation is situated close to the south, but is understood separately owing to the different functionality, style and period. The blank elevation of the Tudor Rose beyond frames the setting to the south.

5.73 The setting makes no particular contribution to the appreciation of the building.

### 1 WORKS, FORMERLY STABLE AND COACH HOUSE OPPOSITE OSTERLEY PARK ROAD

5.74 This building has two storeys with a pitched roof, and mixed fenestration. There is a decorative red brick string course at first floor level, and a projecting porch with green painted timber columns.

5.75 The building is first seen on the 1935 OS at **Figure 4.4**, set behind the building labelled as 'South Lodge'. Its position, set back from the principal street frontage, is appropriate to its use, as a functional structure built for its utilitarian purpose rather than as a principal element in the streetscape.

5.76 It has since become a substation, and a number of unattractive vents have been added into the elevation.

5.77 The substation has a vernacular character. It possesses a low level of interest as part of the 1930s streetscape; which is recognised in its inclusion on the Local List, but has unattractive modern alterations and does not share any significant associations with persons or events of note.

5.78 The building, whilst heavily altered, forms part of the early streetscene in this part of Southall, and therefore has some local interest.



Figure 5.12 St Anselm's Church

### CONTRIBUTION OF SETTING TO HERITAGE VALUE

5.79 The building sits on the west side of The Green, set back from the road, adjacent to the car park of St Anselm's Church.

5.80 The surrounding context makes a limited contribution to the setting of the building. Built form in the vicinity is varied in terms of both style and period, and does not make a particular contribution to the appreciation of the former stable and coach house.

5.81 There is no historic or other association between the Site and the building.



Figure 5.13 The substation

**6.0**

# **TOWNSCAPE AND VISUAL CONTEXT**

**THE GREEN, SOUTHALL**

# TOWNSCAPE AND VISUAL CONTEXT

## TOWNSCAPE

6.1 The townscape surrounding the Site may be categorised into eight distinct areas. For the purposes of this assessment the character areas are referred to as:

- Character Area 1: Residential development south of the railway line;
- Character Area 2: Industrial Estate;
- Character Area 3: Residential Development north of Railway Line;
- Character Area 4: Canal walk and open space;
- Character Area 5: Modern retail outlets;
- Character Area 6: Minet County Park;
- Character Area 7: Enclave of industrial buildings; and
- Character Area 8: Main shopping frontages at Southall.

6.2 The broad boundaries of the character areas are identified in **Figure 6.1**. The character and appearance of the character areas is discussed below.

### CHARACTER AREA 1: RESIDENTIAL DEVELOPMENT SOUTH OF THE RAILWAY LINE

6.3 This large character area comprises residential development south of the railway line. Much of the area was developed as part of 19th and 20th century suburban expansion in response to the improved transport links offered by the railway.

6.4 The houses are predominantly of a uniform scale and grain, with schools and some public amenity spaces to support the residential use.

6.5 Houses are arranged on a broadly N/S axis, in a series of parallel, linear streets, with regular plot sizes and a consistent building line.

6.6 Townscape Value: **Low**

### CHARACTER AREA 2: INDUSTRIAL ESTATE

6.7 This character area comprises industrial and former industrial buildings with large footprints. Materially, the area is varied, with corrugated metal and other utilitarian structures a prominent feature.

6.8 The main body of the area has a broadly triangular shape, constrained by the railway lines proceeding from Southall Station to the west.

6.9 To the north, the boundary of the character area is partially defined by the railway line, with a range of sidings providing access for freight from the former Maypole Margarine Works at the western end of the area. Some further industrial development is situated north of the railway, constrained by the residential development on the north side of Park Avenue.

6.10 There is no public open space within the character area, and its southern extent is defined by the east-west canal.

6.11 Townscape Value: **Very Low**

### CHARACTER AREA 3: RESIDENTIAL DEVELOPMENT NORTH OF THE RAILWAY LINE

6.12 This area comprises the main residential development within Southall, situated north of the railway line. The area derives its character from its parallel, linear streets lined with two storey terraces.

6.13 Character sub-areas a, b and c are separated by the main through routes of The Broadway, running east-west, and South Road, running north-south.

#### CHARACTER SUB-AREA 3A

6.14 Character Sub-Area 3a lies to the north of The Broadway. As with the rest of the character area, it predominantly comprises terraced housing, with some earlier development including Grove House (grade II). There are a number of schools in the area which support the residential use.

6.15 There is some variation in street orientation, and some semi-detached properties are located towards the east of the area. These are situated within defined plot boundaries, and are of a consistent scale and grain.

#### CHARACTER SUB-AREA 3B

6.16 Character Sub-Area 3b lies to the west of South Road. This area of residential development comprises fine grain terraces arranged broadly north-south from The Broadway, with a consistent scale and building line. There is a school to support the residential use, and Southall Station is situated close to the south eastern extent.

#### CHARACTER SUB-AREA 3C

6.17 This Sub-Area includes semi-detached properties set between Uxbridge Road to the north, and the railway line to the south. The buildings are of a consistent scale and grain, with defined plots which include small front gardens, with driveways for car parking.

6.18 Area 3c includes the public amenity space of Southall Park, which comprises areas of lawn, tree planting, children's play area and a parterre style garden, traversed by a number of pathways. This supports the neighbouring residential use, and provides relief from the dense, suburban environment.

6.19 Townscape Value: **Low**

### CHARACTER AREA 4: CANAL WALK AND OPEN SPACE

6.20 This character area comprises the open space to the south of the Grand Union Canal, defined by the railway line to the south, and extent of residential development to the north.

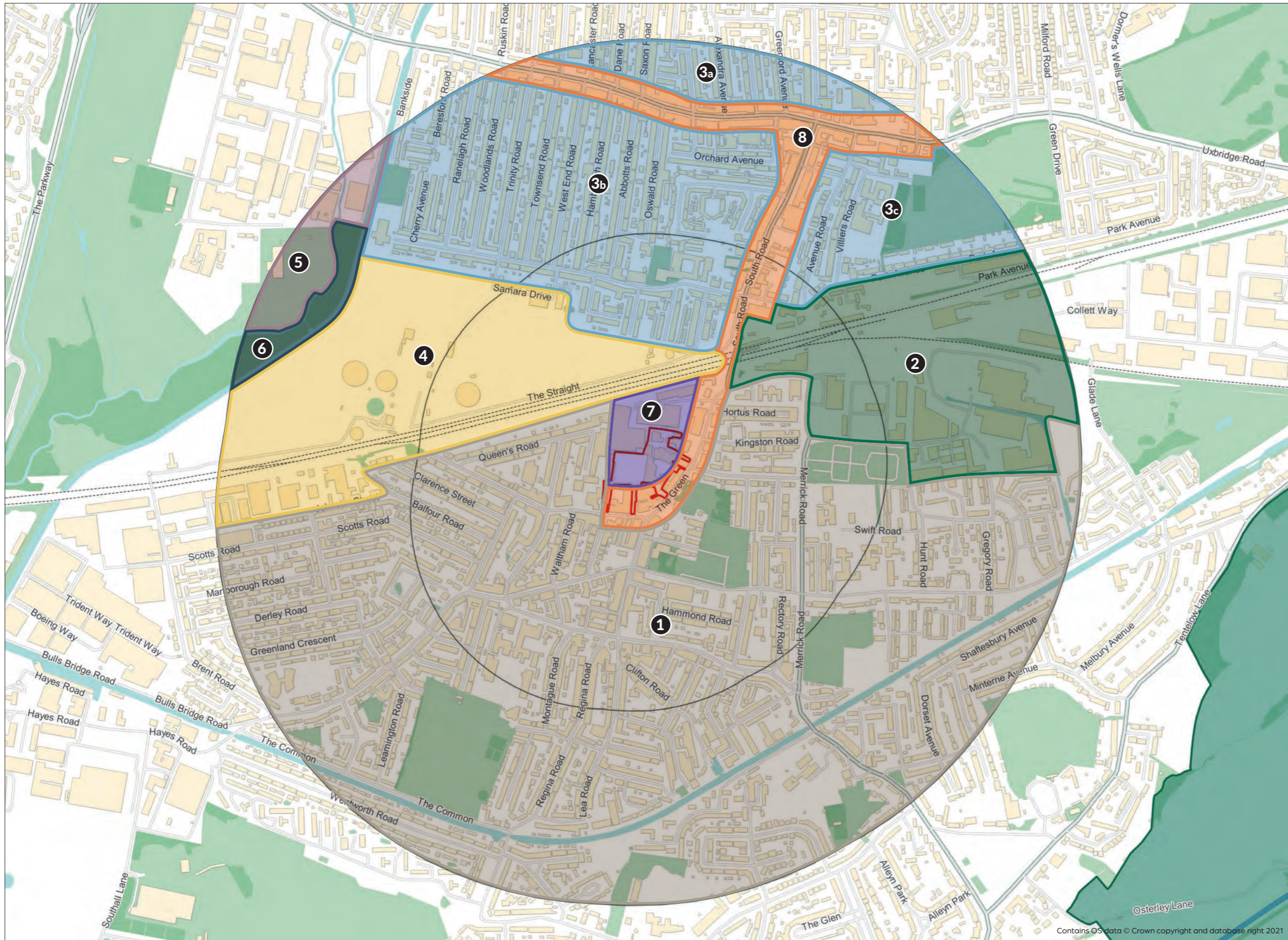
6.21 The area has a post-industrial character, comprising the gas works and a large area of hard standing. At the eastern extent is the grade II listed water tower, though the character area does not contribute to the appreciation of its value.

6.22 The area is defined by its former industrial uses, and proximity to the railway line.

6.23 Townscape Value: **Very Low**

# CHARACTER AREA PLAN

- Application Site
- 1** Residential development south of the railway line
- 2** Industrial Estate
- 3** Residential development north of the railway line
- 4** Canal walk and open space
- 5** Modern retail outlets
- 6** Minet County Park
- 7** Enclave of industrial development
- 8** Main shopping frontages at Southall



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**LOCATION:**  
The Green, Southall

**DATE:**  
October 2021

**SCALE:**  
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**FIGURE 6.1** Townscape Character Area Plan



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### CHARACTER AREA 5: MODERN RETAIL OUTLETS

- 6.24 This Character Area comprises a range of modern retail outlets with associated areas for parking and deliveries. The outlets are predominantly single storey, with a mixture of corrugated metal and brick construction.
- 6.25 The character area includes a small portion of the Minet Country Park, adjacent to the canal, which is contained by dense tree cover, and forms a clear boundary between the character area and the main suburban development of Southall.
- 6.26 The Hayes & Yeading United Football Club Ground includes a number of cultivated external pitches in this part of the character area.
- 6.27 Townscape Value: **Low**

### CHARACTER AREA 6: MINET COUNTY PARK

- 6.28 This Character Area comprises the area of open space to the east of the Grand Union Canal and south of Character Area 10. It forms a small part of the larger public amenity space at Minet Country Park, and includes the canal side walk, which forms part of the Hillingdon Trail.
- 6.29 The area is an attractive green open space at the edge of the settlement. It links with the retail outlets to the north, which have an urbanising effect. The character area forms an important public open space.
- 6.30 Townscape Value: **Low**

### CHARACTER AREA 7: ENCLAVE OF INDUSTRIAL DEVELOPMENT

- 6.31 This small character area comprises an area of warehouse and light industrial development to the south of the train line and west of South Road. The southern half of the character area includes the Site, which also extends into the adjacent main shopping frontages area.
- 6.32 This area has a heavily urbanised character, comprising a range of low-rise warehouse type buildings set within associated hard standing, and a large car park. The area has an impermeable character, with few active frontages and little public space.
- 6.33 The area has an impermeable character, and sits somewhat awkwardly alongside the residential development on Gladstone Road to the west.
- 6.34 Townscape Value: **Very Low**

### CHARACTER AREA 8: MAIN SHOPPING FRONTAGES AT SOUTHALL

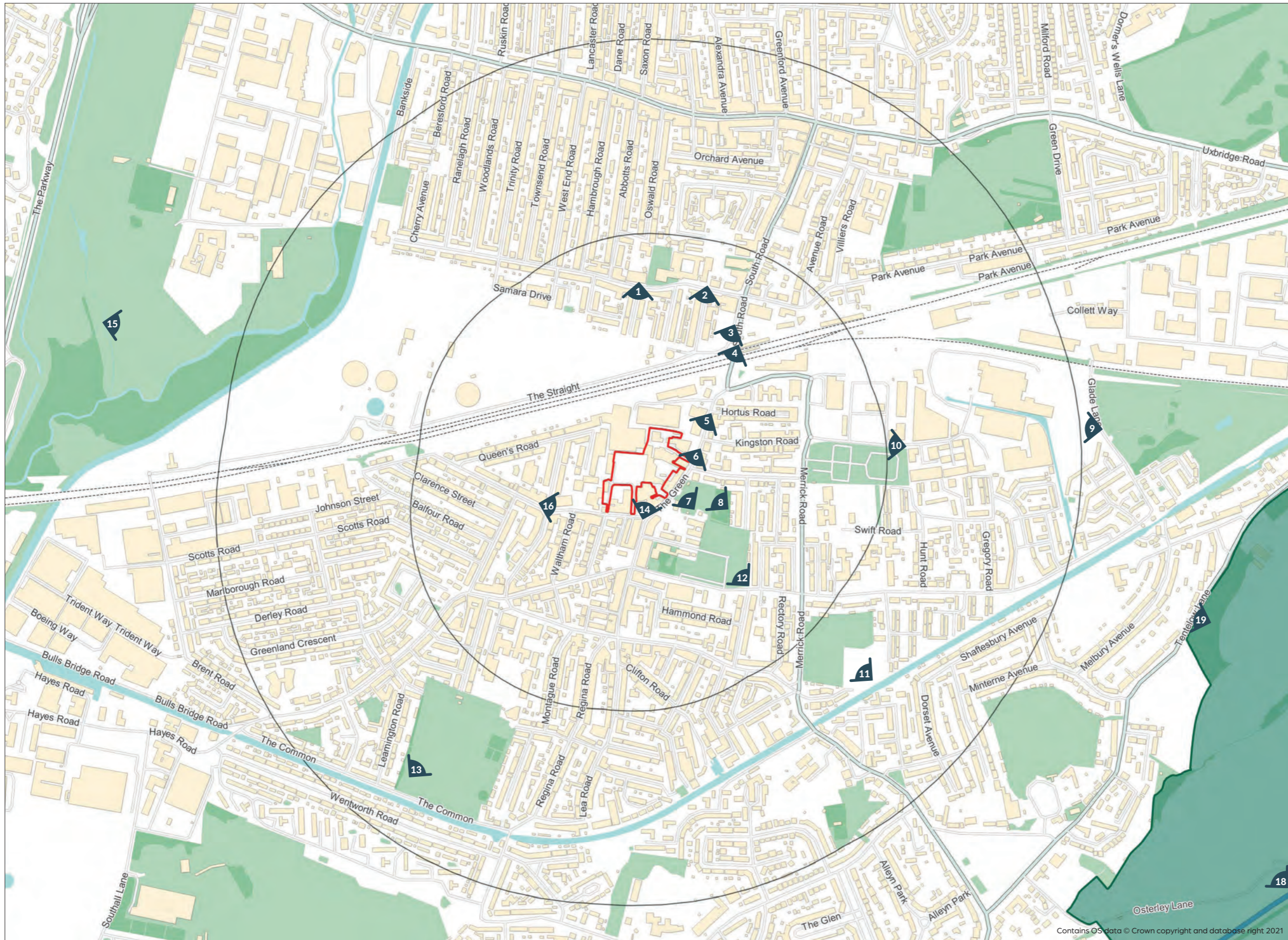
- 6.35 This character area comprises the main shopping frontages along The Broadway, South Road and High Street. Built form is varied in style, between 2–4 storeys, and is unified through the broad pavement which provides pedestrian access for shoppers. The Site partially extends into this character area.
- 6.36 In addition to retail frontages, the area includes Southall Town Hall and fire station, as well as the grade II\* Liberty Cinema and the Church of St George (grade II). These form part of the town centre character at the core of Southall.
- 6.37 The area has a vibrant character, with market stalls creating interest at street level.
- 6.38 Townscape Value: **Low**

### VISUAL

- 6.39 The baseline study identified 18 viewpoint locations that should be tested as part of the visual impact assessment. These locations have been identified at key points in the townscape from where the effects of the proposals have been tested.
- 6.40 11 of the 18 views identified have been modelled as AVRs. The location of the viewpoints is provided at **Figure 6.1** and **Figure 6.2**, where **Figure 6.2** shows the images that are subject to formal AVR testing. **Table 6.1** below provides an overview of the heritage and townscape considerations for the AVRs that have been modelled formally, including any additional considerations such as the proximity to key transport nodes. A description of the existing scene for each identified view and the likely visual receptors are provided at **Section 9.0**. This description is set alongside a corresponding AVR of the Proposed Development and analysis of any significant effect occurring.
- 6.41 The application is also supported by short distance views (CGIS – non-verified) which have been agreed with Historic England and have informed the assessment.

**VIEW LOCATION PLAN**

Application Site



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**FIGURE 6.2** Viewpoint plan

▲ NORTH



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# VIEW LOCATION PLAN

 Application Site



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**FIGURE 6.3** AVR Viewpoint plan

 **NORTH**

Table 6.1 Viewpoint Summary

VIEW	LOCATION	TOWNSCAPE CHARACTER	HERITAGE ASSETS	VISUAL RECEPTORS	AVR TYPE	ADDITIONAL CONSIDERATIONS
1	Beaconsfield Road, Lewis Road	Residential	N/A	Pedestrians Road users Residents	Wire Line (AVR1)	
2	Beaconsfield Road, Randolph Road	Residential	N/A	Pedestrians Road users Residents	Wire Line (AVR1)	
4	South Road, Southall Bridge	Commercial	N/A	Pedestrians Road users	Wire Line (AVR1)	Proximity to station
10	Bridge Road, Horton Burial Ground	Commercial	N/A	Pedestrians Road Users	Wire Line (AVR1)	
11	Grand Union Canal	Open Space Residential Commercial	N/A	Users of Amenity Space Pedestrians	Wire Line (AVR1)	
12	Havelock Road, Victoria Road	Open Space Cemetery	N/A	Visitors to Churchyard Pedestrians	Wire Line (AVR1)	
13	Southall Recreation Ground	Open Space Residential	N/A	Users of Amenity Space Pedestrians	Wire Line (AVR1)	
15	Minet Country Park	Open Space Commercial	N/A	Pedestrians Users of Amenity Space	Wire Line (AVR1)	
17	Osterley House	Open Space	Osterley Park RPG (grade II)	Pedestrians Users of Amenity Space	Wire Line (AVR1)	
19	Tentlow Lane	Residential	N/A	Pedestrians Road Users Residents	Wire Line (AVR1)	



**7.0**  
**THE PROPOSALS**  
**THE GREEN, SOUTHALL**

# THE PROPOSALS

- 7.1 This section of the HTVIA describes the Proposed Development, and the pre-application consultation process through which the proposals have been refined in advance of the final submission.
- 7.2 The constraints of the Site have been subject to a detailed assessment throughout the design development process. This process has benefitted from detailed discussion with the London Borough of Ealing, the GLA, and Historic England. The design amendments raised over the course of that process have been reflected in the final proposals for submission.
- 7.3 The Site sits within a busy, urban settlement. Whilst it forms part of the wider settlement of a number of heritage assets, the proximity to Southall Manor House and its grade II\* designation mean that the relationship between it and the Proposed Development is of particular sensitivity, and has thus been considered carefully. In developing the scheme, Hunters architects have been mindful of the significance of this and other heritage asset in the vicinity of the Site.

## CGIS AND APPROACH

- 7.4 This section is supported by CHIs prepared by Hunters. For clarity, the viewpoints we have identified for assessment were selected through a complex and time consuming process informed by site inspections and discussions with the architects, as well as input from Historic England. In our judgment this process has resulted in a comprehensive set, which has been selected mindful of the best practice guidance provided in GLVIA3, as well as the setting guidance for heritage assets.
- 7.5 In line with the aforementioned GLVIA3 principles of visual impact assessment, these are representative views, selected to aid the reader in understanding the impact on visual receptors in the environs of the Site. The CGIs provide an indication of the wider experience for visual receptors, as an aid to understanding the way the proposals would look on site.
- 7.6 The purpose has been to test views from the most relevant locations to test townscape and heritage impacts.
- 7.7 Whilst visualisations are helpful in providing an impression of how the proposals would look on site, these are only two dimensional and our assessment is based also on the drawings, information in the Design and Access Statement and a detailed understanding of setting and townscape experience.
- 7.8 The purpose of the CGIs is to support our understanding of the scheme and inform assessment of effects on townscape and heritage.

## THE PROPOSALS

- 7.9 The Proposals will comprehensively redevelop a fractured, back-of-house brownfield Site within the town centre, and deliver a high-quality residential-led development with mixed uses appropriate to the town centre location and in accordance with the requirements of allocation SOU8.
- 7.10 The Site is currently occupied by a range of low-rise, light industrial buildings, which are of no particular historic or architectural value. One building, the Tudor Rose, faces The Green, and is to be retained as part of the Proposals. This comprises an early 20th century former cinema which has been heavily altered with a number of modern additions.

- 7.11 The residential-led approach to the Proposed Development responds to an identified need in the locality, and will provide 564 units. The new commercial units at ground floor will activate the frontages (**Figure 7.1**), and draw people into the Site, which is presently an unwelcoming, largely private environment.
- 7.12 The proposals have been developed mindful of the diverse range of uses in the vicinity of the Site, and the opportunity to create a new development which will make an improved contribution to the legibility of the street scene.
- 7.13 The Proposed Development will comprise the following works:
- Creation of a mixed, residential-led development, including 564 residential units;
  - Creation of 2922.8sqm of commercial floorspace (Class A1-A3, B1, D1 and D2);
  - Development of three character areas of varied scale (2-19 storeys), articulation and materials, to respond to the context of the Site;
  - Creation of a taller, landmark building at the north of the Site, located closest to the railway line which responds to the town centre location;
  - Creation of a lower-scale character area at St Anselm's, providing a gateway to the development and responding to the High Street context to the east;
  - Demolition of poor-quality former industrial buildings;
  - Improved permeability through the Site.
- 7.14 These will be accommodated in five character areas (**Figure 7.2**) which respond to the existing uses and built form closest to that part of the Site, and will contribute to a distinctive local character. These are:
- a. Northern Gateway;
  - b. Central Heart;
  - c. Industrial Fringes;
  - d. St Anselm's;
  - e. Dominion Road Approach; and
  - f. Manor House Approach.



Figure 7.1 CGI showing the frontages at street level



Figure 7.2 Plan showing the character areas within the Site

- 7.15 To achieve this, it is necessary to demolish a substation between St Anselm's Church and The Tudor Rose, which is included on the local list.
- 7.16 The substation building comprises two storeys with a pitched roof. It is built in brown brick with painted gables and steps to an entrance at first floor level. Owing to its scale and position, it is experienced from a relatively contained part of the streetscene; comprising the adjacent car park, pedestrian walkway and the immediate space at The Green, but is an attractive feature in views of this part of the streetscene.
- 7.17 Of particular relevance to heritage considerations is the Manor House Approach, where an existing access route into the Site will be opened up, and pedestrianised, to create a welcoming, attractive entrance to the new development, with new street trees, hard standing and a plaza (Figure 7.3). A street market is also proposed, creating a permeable and attractive street-level environment to the north of Southall Manor House (Figure 7.4).



Figure 7.3 Manor House Approach



Figure 7.4 View towards the Manor House

- 7.18 The form and composition of the buildings has been consciously developed to have a simple, refined appearance.
- 7.19 The scale and proportions of the new built form have been carefully considered, and the new buildings have been designed with a defined top, middle and bottom with active frontages at ground floor. This is to ensure that the buildings have a human scale at street level, and contribute to an attractive, welcoming street scene which will define the proposed development.
- 7.20 As discussed at **Section 6.0**, the Site straddles two distinct townscape character areas. To address, this the new buildings are arranged in three interrelated blocks, indicated as A, B and C in the Key Plan at **Figure 7.1**. These will comprise an arrangement of visibly distinct towers, which are unified through the use of a common architectural language to create a cohesive, legible development.
- 7.21 The materials of the new buildings have been developed mindful of their relationship with the surrounding context, and the colour palette has been given particular consideration.
- 7.22 The distance between the buildings will create a sense of openness, and contribute to a sense of depth at the Site.
- 7.23 Fundamental to the scheme is the creation of high-quality, landscaped public realm, which will draw visitors into the Site, and provide an attractive setting for the new blocks. The present hardstanding, car parking and irregular circulation routes would be replaced with a planned central space with identified activity areas, contributing to a vibrant character.
- 7.24 The landscaping would respond to the identified character areas, creating a welcoming entrance opposite Southall Manor House with open space for a market, contributing to the bustling urban character of the area.
- 7.25 The ground floor commercial units would introduce active frontages, creating an attractive environment for visitors.



Figure 7.5 View of the Proposals from Manor Park

### PRE-APPLICATION CONSULTATION

- 7.26 The proposals have been developed through a process of consultation with members of the public, officers at the London Borough of Ealing and Historic England.
- 7.27 During pre-application consultation, Historic England stated in written feedback dated 21st November 2019 that:  
*"Having reviewed the information provided by you, we conclude that this proposal would lead to an application for which Historic England would be a statutory consultee, due to the proximity of the site to the grade II\* listed Southall Manor. Whilst the proposals are likely to be visible within the context of the Manor, these views are not considered critical to the setting or significance of the manor. We are therefore unlikely to raise any concerns or objections to the proposals if they were submitted for planning permission."*
- 7.28 The authorities are supportive of the principle of the regeneration of this site which is in accordance with the requirements of the allocation set out in the Development Sites DPD.
- 7.29 The proposals have also been presented to the local community through public consultation events and stakeholder discussions. The timeline of public engagement undertaken is set out in the Design and Access Statement prepared by Hunters architects and the Statement of Community Involvement.

**8.0**

# **ASSESSMENT: HERITAGE**

**THE GREEN, SOUTHALL**

# ASSESSMENT: HERITAGE

8.1 The following section assesses the effect of the Proposed Development on the identified heritage assets described at **Section 5.0**.

8.2 There are no designated or undesignated heritage assets within the Site. The heritage effects of the Proposed Development therefore comprise potential changes to the setting of assets in the vicinity of the Site.

8.3 A qualitative assessment is provided below, with reference to the key CGIs of the scheme from Manor Park, from Manor House Approach as shown on the map at **Figure 6.3**.

## PRINCIPLE OF DEVELOPMENT

8.4 The Site forms part of the Site Allocation SOU8 (The Green) in the Ealing Development Sites DPD (2013). The design principles set out in the allocation state that away from frontages to The Green:

*"[...] the layout and block structure should explore the opportunity afforded by the significant backland area across the site to better manage the relationship between the industrial uses to the south and east of the site and the high street environment of The Green, based around a rationalised block structure and street layout."*

8.5 The Applicant's aspirations for the project are to add a new building quarter that is entirely capable of improving the appearance of this part of the town that takes reference from the prevailing characteristics of the history and appearance of the CA.

8.6 The overarching aim is to replace an unattractive, impermeable range of light industrial buildings and hard standing with a new, comprehensive scheme that will enhance the character, permeability and amenity of the Site.

8.7 The industrial uses at the Site would be preserved, accompanied by new, active ground floor frontages, and 550 homes above.

8.8 Through the development of the proposals, the project team has been mindful that conservation is a process of managing change and not simply preserving the status quo for its own sake. The emphasis is on understanding what is special about a heritage asset and its setting, and ascertaining where certain elements are capable of accepting change without harming the special values of a place.

8.9 **Sections 4.0** and **5.0** have set out a detailed analysis of the historical development of the Application Site and its heritage significance.

8.10 In considering the impact of the works on the significance of the Application Site, the starting point for an assessment of impact must be to recognise that:

- Southall Manor House is a highly graded heritage asset which sits within a heavily altered, mixed setting. The Site does not contribute to the significance of the asset, which is best appreciated in views south and west. A change to this part of the setting should not, therefore, be intrinsically harmful in the manner meant in heritage policy.
- The town centre is the subject of a number of ongoing redevelopment projects which include taller development, as befits the location. Buildings with a taller presence are not therefore alien to the street.

8.11 This approach is supported by the NPPG that promotes sensitive design that delivers public benefits in a sustainable and appropriate way and paragraph 200 of the NPPF which states that local planning authorities should treat favourably those developments that better reveal the significance of a heritage asset.

8.12 Below, we assess the effect of the Proposed Development on the salient heritage assets identified previously in this report.

## LISTED BUILDINGS

### SOUTHALL MANOR HOUSE (GRADE II\*)

8.13 Southall Manor House is situated to the south-west of the Site, on the opposite side of The Green. It is understood as an historic building within this part of Southall, the context of which has changed over time. The area of hard standing and open space to the north allows visitors to appreciate the building's form, and the adjacent open space at Manor House Grounds contribute to the understanding of the historic extent of the property. The wide pedestrian area to the west of the parade of shops would frame views towards the Manor.

### PRINCIPAL VIEWS

8.14 Blocks B3-B5 (St Anselm's) lies closest to the Manor House. The scale of this part of the Proposals has been developed mindful of the prevailing heights along the high street frontages, and thus step down to three storeys where the Site abuts The Green, maintaining the character of the high street frontages and their contribution to the receptor's setting.

8.15 The image at **Figure 8.1** shows the proposed scheme from Manor Park outside the Manor House looking north west. This CGI captures the proposed view from within the immediate setting of the Manor House and corresponds with the likely effect on viewpoint locations 7 and 8 as shown on **Figure 6.2**.

8.16 Whilst the Proposed Development would be a significant change in the setting of the listed building, this would not harm the intrinsic heritage value of the building, or its appreciation.

8.17 The building is best appreciated in views from the north and west, in which the brick diapering and historic character can be seen. From these perspectives, the Proposed Development would be to the viewer's rear.

8.18 In these views from the south, which would take in the Proposed Development, the viewer would be aware of the significant uplift in the scale of development at the Site. The street frontage to The Green would be unchanged, and the set-back development understood separately.

8.19 There will be a beneficial change to the quality of the architecture on the site and thus seen in these closer townscape views 7 and 8. In particular from the green space adjacent the Manor House.



Figure 8.1 View of the Proposals from Manor Park



Figure 8.2 View of the Proposals on approach from Manor House



Figure 8.3 View towards the Manor from within the development

- 8.20 The CGI included at **Figure 8.2**, as well as the image in 8.1, helps to visualise how the scheme will be experienced on approach to the Manor House from the north, indicated by views 3, 5 and 6 on **Figure 6.3**. This view is also helpful to visualise the changes that will be seen from the location of View 14.
- 8.21 This image shows how the buildings will meet the ground and activate the spaces and public realm within the site which will be glimpsed through gaps in the buildings. The upper parts of the buildings will be seen above the existing commercial properties on the High Street, creating interest and sign posting the activities beyond the front buildings.
- 8.22 The CGI included at **Figure 8.3** shows the view from inside the development looking along Dominion Road towards the site, as indicated by View 16 on **Figure 6.3**. The proposed buildings frame the view and the vista towards the listed building and the important new public realm on the high street.
- 8.23 The CGI at **Figure 8.4** shows the new view that will be created towards the Manor House from within the Site. The historic building would come into view as one moved closer towards The Green. The modern expression and materiality of the new development remains visually distinct from the historic character of the Manor House, and its human scale in views out from the Site creates a comfortable addition to its setting.

### ENTRANCE TO THE SITE

- 8.24 The access route into the Site from immediately north of the Manor House will be improved through new landscaping, including tree planting, and the creation of a dedicated market zone to enliven the frontage and create a welcoming, permeable route into the new development.
- 8.25 The entrance to the Site in this area would be regenerated with new frontages and tree planting to improve the appearance of the Site as experienced from The Green, including in views from the north towards the Manor House.
- 8.26 Creating a new access route here, and increasing the pedestrian circulation in the vicinity of the Site, will improve the opportunity to appreciate the heritage value of the manor house.

### SCALE

- 8.27 The height of the Proposed Development means that the towers would be a visible element in the skyline to the north of the building. Whilst this would be a noticeable change to the setting in this area, the new built form would be understood separately from the asset, which is, in any case, best appreciated in views south and west, in which case the viewer would be facing away from the proposals.

### SOUTHALL WAR MEMORIAL (GRADE II)

- 8.28 Similarly to Southall Manor House, the War Memorial is situated on the south side of The Green, within an area of paving which allows pedestrians to move around the memorial and consider its value.
- 8.29 The Proposed Development would likely result in increased footfall past the War Memorial as pedestrians moved along the access route into the Site to the north. This would facilitate the appreciation of the asset by a wider group of people.
- 8.30 The taller elements of the proposals would be visible in views of the memorial from the south, set behind the existing line of buildings on the north side of The Green. Whilst a change to the asset's setting, this would not change the appreciation of its significance, or cause harm to its intrinsic value. The new buildings would be attractive, high quality additions to the streetscape which would be understood separately, and be peripheral to the experience of the monument.
- 8.31 The Proposals would thus not harm the setting, or by extension, significance, of the War Memorial.

### THE WATER TOWER (GRADE II)

- 8.32 The Water Tower has a wide setting, which takes in areas of the wider townscape, owing to the open space of the railway line immediately to the south.
- 8.33 The change in the character of the Site from a low-rise former industrial Site to a high quality new development would be a noticeable change in the setting of the water tower. In views from Southall Bridge, the Proposals would define the space to the south of the railway line, and form an attractive addition to the setting of the tower.
- 8.34 The Proposed Development would be visually distinct from the Water Tower through its design and use of materials.
- 8.35 The immediate setting of the tower would be unchanged. The appreciation of its heritage value in views from the west, and in the limited views that exist from the south, would be unimpeded.

### LIBERTY CINEMA (GRADE II\*)

- 8.36 The Liberty Cinema is situated to the north west of the Site, on the west side of South Road. The two are separated by the railway line and considerable interposing development.
- 8.37 The immediate context of the Cinema comprises the high street frontages along South Road, which create a tight setting.
- 8.38 This would be unchanged as a result of the Proposed Development. The prominence of the cinema in the streetscape, and the appreciation of its unusual detailing, would not change. The Proposed Development would have no effect on the heritage value of the Liberty Cinema, or the appreciation thereof.

### 196 AND 198, NORWOOD ROAD (GRADE II)

- 8.39 These heritage assets are situated within an area of residential development approximately 1km south west of the Site. The two are entirely separate both physically and functionally, and there would be no change to setting as a result of the Proposed Development. The heritage value and appreciation of the building would be preserved.

8.40

### CHURCH OF ST GEORGE (GRADE II)

- 8.41 The Church of St George is situated approximately 1km north of the Site, and the two are separated by considerable interposing development. The church is best appreciated in views from the south and west, and does not have any historic or other association with the Site.

- 8.42 The Proposed Development would have no effect on the heritage value or appreciation of the listed building.

### RED LION PUBLIC HOUSE (GRADE II)

- 8.43 The Red Lion Public House is situated approximately 1km north east of the Site, along Uxbridge Road (A202). There is no historic or other relationship between the receptor and the Site, which makes no contribution to its setting.

- 8.44 The Proposed Development would have no effect on the heritage value or appreciation of the listed building.

### FEATHERSTONE BOYS SCHOOL WAR MEMORIAL (GRADE II)

- 8.45 The Featherstone Boys School War Memorial has a tight setting, within the forecourt of the school with which it is associated. The Site presently makes no contribution to the setting or appreciation of the memorial.

- 8.46 The Proposed Development would have no effect on the significance or appreciation of the memorial, which would continue to be understood as a memorial to those who lost their lives in the war.

- 8.47 There may be some partial views towards the upper parts of the Proposed Development towards the north-east, however these would be peripheral to the viewer's experience, and would have no effect on the appreciation of the memorial. The new built form would be an attractive addition to the wider townscape context, and would be understood as part of the modern town centre development in Southall.

- 8.48 The intrinsic heritage value of the memorial, and its legibility, would not change.

### LOCALLY LISTED BUILDINGS

#### LOCALLY LISTED SUBSTATION

- 8.49 The proposals would necessitate the demolition of the locally listed substation at the Site, in order to facilitate its redevelopment. The substation is experienced from within a relatively contained context, comprising the pedestrian route adjacent to The Tudor Rose, and the adjacent car park. Its exterior does not express its function to the casual observer, and its vernacular appearances is judged to make a limited positive contribution to the streetscene. There are no notable relationships with adjacent buildings, or with people or events of note.

- 8.50 Nevertheless, there would be a low level of harm attached to its demolition, and this should be considered under paragraph 197 of the NPPF. The demolition is necessary to achieve the redevelopment of the Site as a whole. Given the low level of significance of the building to be demolished, the limited area in which it will be experienced, and the necessity of the works to deliver the redevelopment of the Site, the demolition is, on balance, considered to be acceptable.

- 8.51 **Figure 8.5** shows the view toward the Site and the Tudor Rose. The red brick materiality in this part of the Site would be an appropriate, and attractive addition to the streetscape, relating comfortably to St Anselm's Church adjacent. The set back from the Tudor Rose and increase in scale creates a mid-point between The Green frontage and the taller development in the core of the Site.

#### SUNRISE RADIO BUILDING

- 8.52 The Sunrise Radio Building is both physically and functionally separate from the Site, forming part of a former cluster of industrial buildings to the south of the railway line.

- 8.53 The building lies within an allocated Site, and its immediate surroundings are undergoing significant change.

- 8.54 The Proposed Development would have no effect on the ability to appreciate the special interest of the building, or its intrinsic value.

### SOUTHALL COMMUNITY CENTRE

- 8.55 Southall Community Centre is situated to the east of the Site, along South Road, and has some associations with the former Monsted Margarine Works Site to the east.
- 8.56 The building is both physically and functionally separated from the Site, which presently makes no contribution to its heritage value or appreciation.
- 8.57 There is the potential for the Proposed Development to appear in some views of the building's western elevation, however, these would be partial, and understood as befitting the town centre location. The ability to appreciate the building's special interest would not change.
- 8.58 There would be no effect upon the significance of the locally listed building as a result of the Proposed Development.

### ST ANSELM'S CHURCH

- 8.59 The Proposed Development would be a noticeable change in the setting of the locally listed structure, which is situated close to a proposed entrance to the Site.
- 8.60 The surrounding street scene at present makes no particular contribution to the significance or appreciation of the trough, which is understood as a remnant of an earlier context.
- 8.61 The Proposals would improve the setting of the locally listed building through the creation of an integrated gateway to the new development and addressing the high street context. This would not, however, affect the building's value, or the appreciation thereof.

### RAILWAY ARCHES

- 8.62 The railway arches are both physically and functionally separated from the Site, and are subject to a planning consent which allows for their demolition. Therefore, there will be no setting effect as a result of the Proposed Development.

### CATTLE TROUGH OUTSIDE NO. 55 THE GREEN

- 8.63 The Proposed Development would be a noticeable change in the setting of the locally listed structure, which is situated close to a proposed entrance to the Site.
- 8.64 The surrounding street scene at present makes no particular contribution to the significance or appreciation of the trough, which is understood as a remnant of an earlier context.
- 8.65 This would not change as a result of the Proposed Development.
- 8.66 The addition of new built form in the vicinity of the trough would have no effect on its appreciation. The attractive new approach road opposite would make a positive contribution to its setting.
- 8.67 Overall, the value and appreciation of the cattle trough would be preserved.



**9.0**

# **ASSESSMENT: TOWNSCAPE**

**THE GREEN, SOUTHALL**

# ASSESSMENT: TOWNSCAPE

9.1 The following section assesses the effect of the Proposed Development on the identified townscape.

9.2 The Design and Access Statement prepared by Hunters Architects provides a detailed discussion on the design rationale and architectural approach.

## CHARACTER AREA 1: RESIDENTIAL DEVELOPMENT SOUTH OF THE RAILWAY LINE

9.3 This is a large character area, a small part of which abuts the western extent of the Site. For much of the character area, any experience of the Proposed Development would be peripheral, and in the context of other emerging development at the centre of Southall.

9.4 The Proposed Development would be best appreciated from the environs of Queens Road and Hartington Road, where the newly activated frontages would enliven the Site, and contribute to a more permeable, welcoming environment.

9.5 In some views from the south, the taller elements of the proposals would be readily visible (see views 7,8 and 12 Visual Assessment). These would primarily be experienced as part of longer views, and would be perceived as a substantial new element in the wider townscape, albeit from some distance. The distinct, yet unified design of the proposals would be appreciable, and the new development would not change the relationship between the residential character to the south and the higher density development closer to the town centre.

9.6 The new residential use would complement the existing use within this character area, and be an attractive, high quality addition to the setting of the character area.

## CHARACTER AREA 2: INDUSTRIAL ESTATE

9.7 This character area is undergoing significant redevelopment, including taller elements and new mixed-use development under an allocation in SOU6 in Ealing's DPD. These would filter views towards the Site, and contribute to the emerging, modern character in the centre of Southall.

9.8 Within this emerging context, the taller parts of the Proposed Development would be visible, and would be an attractive feature in the wider setting of the character area.

9.9 The functioning of the character area would not change, and the experience of the receptor would be preserved.

## CHARACTER AREA 3: RESIDENTIAL DEVELOPMENT NORTH OF THE RAILWAY LINE

9.10 This area is sub-divided into three smaller areas of residential development, intersected by the railway line and High Street.

9.11 The intrinsic residential character of the area would not change as a result of the Proposed Development. Owing to the street alignment and separating distance from the Site, views of the Proposed Development would be limited, and where these would occur, would be understood as part of the more concentrated development at the town centre.

9.12 The intrinsic domestic character of the area would not be affected by the Proposed Development, and its functioning would remain the same.

## CHARACTER AREA 4: CANAL WALK AND OPEN SPACE

9.13 This Character Area is both physically and functionally separated from the Site. The Proposed Development would have no effect on the character or functioning of the area.

## CHARACTER AREA 5: MODERN RETAIL OUTLETS

9.14 This Character Area is both physically and functionally separated from the Site. The Proposed Development would have no effect on the character or functioning of the area.

## CHARACTER AREA 6: MINET COUNTY PARK

9.15 This Character Area is both physically and functionally separated from the Site. The Proposed Development would have no effect on the character or functioning of the area.

## CHARACTER AREA 7: ENCLAVE OF INDUSTRIAL DEVELOPMENT

9.16 The Proposed Development would introduce a new character to the area through the replacement of the existing impermeable, unwelcoming industrial buildings with a high quality mixed-use development with residential accommodation and active ground floor uses.

9.17 The proposed use would create a space which better responds to the character of the adjacent areas 1 and 8, and facilitate better links between these through the Site. The legibility of the street scene would be improved by clear, defined access routes, and attractive landscaping would relieve the urban character of the area north of The Green, and improve the public realm.

9.18 The Proposed Development exceeds the present height datums in the character area. The arrangement of new buildings would better define the character area and contribute to a sense of destination, encouraging movement into and through the Site.

9.19 The pedestrian experience within the Site would be improved through natural surveillance from active ground floor uses and residential accommodation above.

9.20 The materiality of the Proposed Development responds to the surrounding characteristics of development to the south, and west towards the town centre. In terms of detailing, each block has been given its own distinct character, with a sense of unity created through the common architectural language. The buildings each have a defined top, middle and bottom section, which also creates a human scale at street level.

9.21 New areas of hard and soft landscaping, including tree planting along routes in and out of the Site, and play areas for children, would improve the appearance of the character area, and encourage its use by a wider demographic.

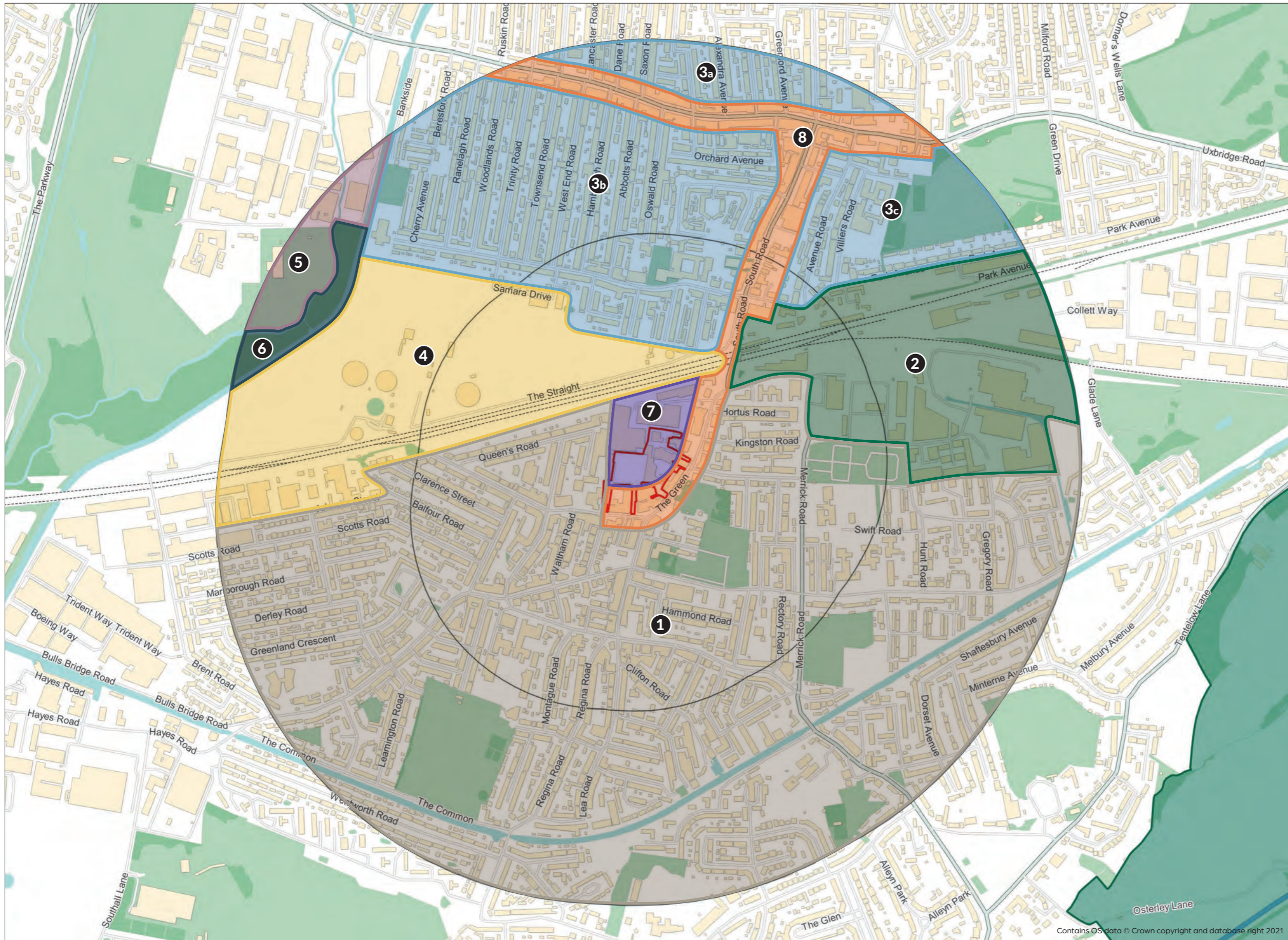
9.22 The proposals have been developed mindful of the emerging character of the locality, and would form an integrated part of the emerging street scene, welcoming people into the character area.

**CHARACTER AREA 8: MAIN SHOPPING FRONTAGES AT SOUTHALL**

- 9.23 The new tree planting and improved street scene along the access routes into the Site would improve the appearance of the Site from within this character area, and encourage movement in and out, enhancing its permeability. The new market spaces along the access routes into the Site would complement and contribute to the vibrant character of the area.
- 9.24 The active ground floor uses would complement the prevailing use within this character area, and better integrate the two.
- 9.25 The proximity of residential accommodation close to the high street frontages is an appropriate use, and would facilitate increased footfall through the character area.
- 9.26 The upper parts of the Proposed Development would be visible from some spaces within the Character Area, but would not affect its intrinsic character or functioning.

# CHARACTER AREA PLAN

- Application Site
- 1** Residential development south of the railway line
- 2** Industrial Estate
- 3** Residential development north of the railway line
- 4** Canal walk and open space
- 5** Modern retail outlets
- 6** Minet County Park
- 7** Enclave of industrial development
- 8** Main shopping frontages at Southall



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**LOCATION:**  
The Green, Southall

**DATE:**  
October 2021

**SCALE:**  
1:10,000 @ A3

**FIGURE 9.1** Character Area Plan

**▲ NORTH**



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# 10.0

# ASSESSMENT: VISUAL

## THE GREEN, SOUTHALL

## VIEW 1: BEACONSFIELD ROAD, LEWIS ROAD

### EXISTING

- 10.1 This viewpoint is situated along Beaconsfield Road, opposite the junction with Lewis Road, oriented south towards the Site.
- 10.2 The foreground of the view has an open character, comprising the junction, which is defined by pavements and terraced houses set behind small front gardens.
- 10.3 The view has a domestic character, and the uniform buildings comprise two storey terraced houses with prominent gables.
- 10.4 The viewer's eye is drawn along Lewis Road towards the south, where it is terminated by a brick wall.



## PROPOSED

- 10.5 The upper parts of the Proposed Development would be visible in the background of the view, behind the houses on the eastern side of Lewis Road, over a distance of approximately 280m.
- 10.6 The Proposed Development would be recognised as part of the emerging taller development in Southall, and would mark the location of the town centre.
- 10.7 The use of materials and the colour palette would help to distinguish the buildings from the foreground, and make an attractive addition to the view as a complementary group of distinct structures.
- 10.8 The towers will be in residential use, which is commensurate with the established prevailing use in the view.



## VIEW 2: BEACONSFIELD ROAD, RANDOLPH ROAD

### EXISTING

- 10.9 The viewpoint is situated along Beaconsfield Road, oriented south along Randolph Road.
- 10.10 The foreground of the view takes in the junction, with Beaconsfield Road running laterally past the viewer. The linear route of Randolph Road opposite occupies much of the frame, and the viewer's eye is drawn along the road towards the mature trees in the background.
- 10.11 To each side, the road is flanked by two storey terraced housing, which contributes to a domestic character.
- 10.12 Some taller development is visible in the background of the view, breaking the roofline to the left hand side of the view.



## PROPOSED

- 10.13 The domestic character of the foreground would not change. The orientation of the street would allow for some views towards the upper parts of the Proposed Development above the roofline of the houses on the western side of Randolph Road, over a distance of approximately 350m.
- 10.14 This would be understood as part of the emerging taller development in Southall, and would mark the location of the town centre. The view already includes the upper parts of modern residential development, and would be understood in this context.
- 10.15 The materials and the colour palette of the Proposed Development would create a sense of distinction between the residential development in the foreground, and the town centre beyond. The new development would make an attractive addition to the view as a complementary group of distinct structures.



## VIEW 4: SOUTH ROAD, SOUTHALL BRIDGE

### EXISTING

- 10.16 This viewpoint is situated along South Road, adjacent to Southall Bridge which passes above the train line. The view is oriented south-west towards the Site.
- 10.17 The view has a linear, urban character. The viewer's eye is drawn towards the background of the view across the bridge, which rises slightly in the middle ground. The high sides of the bridge, elevated above the railway below, create a narrow focus through the middle ground.
- 10.18 Towards the background of the view, areas of taller development, including TRS Apartments which forms a landmark in the view.



## PROPOSED

- 10.19 The fore and middle ground of the view would not change as a result of the Proposed Development, which would be seen in the background, alongside the TRS apartments building.
- 10.20 The individual blocks of the Proposed Development would be distinct from this viewpoint, and appear as an attractive group of buildings unified through their language and proportions. The use of materials would integrate the buildings into their existing context by responding to the prevailing palette of the locality.
- 10.21 The Proposed Development would be a high quality addition to the view which would mark the location of the town centre in views from the station environs, and be beneficial to visual amenity.



## VIEW 10: BRIDGE ROAD, HORTON BURIAL GROUND

### EXISTING

- 10.22 This viewpoint is situated part way along Bridge Road, to the east of the Site, oriented west.
- 10.23 The foreground of the view comprises the hard standing along the road, which is lined to the right hand side with a low-quality range of light industrial buildings, which have a large number of posters and flyers on the outside.
- 10.24 The left hand side of the view is more open in character, where a fence defines the boundary with the adjacent Horton Burial Ground. Whilst the space within the burial ground is not visible, the upper parts of trees can be seen, indicating the open character of the space.
- 10.25 A large number of cars are parked along the road, and contribute to the irregular character of the view. Taken as a whole, the street scene is fragmented, and visual amenity poor.



## PROPOSED

- 10.26 The Proposed Development would be seen in the background of the view, marking the location of the town centre and introducing a new, high quality addition to the scene.
- 10.27 The fore and middle ground of the view would not change. The viewer's focus would remain on the fore and middle ground, and their respective activities.



## VIEW 11: GRAND UNION CANAL

### EXISTING

- 10.28 This viewpoint is situated to the south east of the Site, oriented north-west. It is situated close to the Grand Union Canal, which would be behind the viewer in this position.
- 10.29 The fore and middle ground of the view have an open character, comprised of the flat, lawned amenity space to the north of the Grand Union Canal Walk. The space is bounded by allotments, many of which have greenhouses, and terraced housing outwith the park space.
- 10.30 The distinctive roof dome of the Gurwara Sri Guru Singh Saba forms a landmark in the background of the view.



## PROPOSED

- 10.31 The character and composition of the fore and middle ground would not change, comprising the open space of the park, with more urban development beyond. The view will remain open.
- 10.32 The Proposed Development would be seen in the background of the view, partially screened at lower levels by existing development and the dense tree cover.
- 10.33 The buildings introduce height into this view, which will comprise new residential accommodation and mark the location of the town centre. This will be understood separately from the more domestic character of the fore and middle ground.
- 10.34 Over this distance, they would instead be seen as a range of well-articulated, related blocks. The new buildings would be an attractive feature in the view, and add a sense of depth to the scene.
- 10.35 The roof dome of the Gurwara Sri Guru Singh Saba would remain a focal point in the middle of the view.



**VIEW 12: HAVELOCK ROAD, VICTORIA ROAD**

**EXISTING**

- 10.36 This viewpoint is situated to the south-east of the Site, oriented north-west. It is within St John's Churchyard, and accordingly has an open character, populated with headstones and mature trees in keeping with its restful memorial function.
- 10.37 The boundaries of the churchyard are defined by dense hedges and mature trees in the middle and background.
- 10.38 Some development beyond the boundary can be seen to the right hand side of the view, filtered by the tree cover.



**PROPOSED**

- 10.39 The fore and middle ground of the view would not change as a result of the Proposed Development, and the character of the space as an established cemetery would not change.
- 10.40 Views of the Proposed Development would be filtered through the existing dense tree cover. Any partial views of the Proposed Development would be seen over a considerable distance, and understood as part of the urban development in the wider environment beyond the park.
- 10.41 The character and composition of the view would not change. Any incidental views of the Proposed Development would be peripheral to the experience within the churchyard.



## VIEW 13: SOUTHALL RECREATION GROUND

### EXISTING

- 10.42 This viewpoint is situated to the south-west of the Site, oriented north-east.
- 10.43 The view has an open character, comprised of the amenity space of the recreation ground. A line of trees in the middle ground provides interest and partially screens views of development at the park's boundary. Nevertheless, the character of the space is understood as open amenity space set within a wider urban context.
- 10.44 The view would be experienced as part of the kinetic experience of moving along the path.



**PROPOSED**

- 10.45 The character and composition of the view would not change as a result of the Proposed Development.
- 10.46 The new built form would be largely screened by the existing tree line in the middle ground. Any partial or seasonal views of the Proposed Development would be understood as part of the wider urban context, and mark the location of the town centre.
- 10.47 There would be no change to visual amenity as a result of the Proposed Development.



## VIEW 15: MINET COUNTRY PARK

### EXISTING

- 10.48 This viewpoint is situated within Minet Country Park, oriented south east towards the Application Site.
- 10.49 The foreground of the view comprises the lawned open space of the park, bounded by a dense tree line in the middle ground. Some development is visible to the viewer's left, and in the background of the view, where a number of cranes indicate the ongoing redevelopment at the town centre.



## PROPOSED

- 10.50 The upper parts of the Proposed Development would be visible in the background of the view, and understood in conjunction with the emerging development in Southall.
- 10.51 The buildings would introduce height into this view and mark the location of the town centre. This will be understood separately from the fore and middle ground though the residential use would be in keeping with the buildings in the environs of the park.
- 10.52 Over this distance, they would instead be seen as a range of well-articulated, related blocks. The new buildings would be an attractive feature in the view, and add a sense of depth to the scene.



## VIEW 17: OSTERLEY HOUSE

### EXISTING

- 10.53 This viewpoint is situated close to Osterley House, oriented north-west towards the Site. It is within the grade II Osterley Park Registered Park and Garden.
- 10.54 The foreground of the view takes in the pedestrian path used by visitors to move around the park, and the lawned, landscaped space beyond.
- 10.55 The middle ground of the view is densely planted with mature trees, contributing to a sense of containment in the view.
- 10.56 This view would be experienced as part of a kinetic sequence as the visitor moved around Osterley Park. The viewer would also be aware of their proximity to the listed house and stables.



**PROPOSED**

10.57 The Proposed Development would be entirely screened by the dense tree cover, and would have no effect on the view.



## VIEW 19: TENTLOW LANE

### EXISTING

- 10.58 This view is situated part way along Tentlow Lane, oriented north west towards the Application Site, and would be experienced as part of a kinetic sequence as the viewer moved through the area. The houses to the viewer's left contribute to a domestic character.
- 10.59 The view is oriented laterally across the road, and the viewer would be aware of passing traffic. The dense tree cover in the middle ground screens longer views towards the centre of Southall.



**PROPOSED**

- 10.60 The Proposed Development would be entirely screened by the dense tree cover, and would have no effect on the view.





# 11.0 CONCLUSION

**THE GREEN, SOUTHALL**

# CONCLUSION

- 11.1 This Built Heritage, Townscape and Visual Impact Assessment (hereafter 'HTVIA') has been prepared by Montagu Evans LLP on behalf of Peabody to accompany the application for Planning Permission relating to the development of the Site at The Green.
- 11.2 The description of development is as follows:  
*“Demolition and mixed-use redevelopment (phased) to provide 3 urban blocks comprising residential units (Use Class C3), flexible commercial and employment floorspace (Use Classes E, F1 & F2), private and public car parking, servicing bays, public realm and associated landscaping, play and amenity space, plant and refuse areas, and access arrangements”.*
- 11.3 This HTVIA considers the heritage, townscape and visual effects of the Proposed Development and follows established best practice guidance.
- 11.4 The Site is not in a Conservation Area and nor does it contain any statutorily listed buildings. It is not within or near to an area of Metropolitan Open Land, any Sites of Importance for Nature Conservation or Registered Parks or Gardens. The effects upon heritage assets are therefore limited to setting effects.
- 11.5 The Site lies within an allocation for Policy SOU8 (The Green), which sets out the following:  
*“Mixed use development appropriate to the town centre, with continued protection of existing industrial uses on the Featherstone, Domunion and Suterwalla estates as a Locally Significant Industrial Site (LSIS) and retention of the Dominion Arts Centre.  
 The site contains a wide variety of comparatively low density uses and an underused surface level car park. Consolidation and intensification of the site will allow retention of the locally important industrial uses and support the introduction of new uses to support the vitality and viability of the neighbourhood centre.”*

## SUMMARY OF CONCLUSIONS

- 11.6 Our findings on the effects of the proposals are set out at Sections 9–11 of this document.
- 11.7 Overall, we have not found there to be any significant, long term effects arising from the Proposed Development on heritage assets, townscape character areas or visual receptors.
- 11.8 The change envisaged for the Site, as identified in the site allocation SOU8 (LBE, 2013) will inevitably bring about considerable change as a result of the scale and nature of the new development.
- 11.9 Particular consideration has been given through the design process to the setting of the highly graded Southall Manor House (grade II\*), and the design team have sought to understand and consider the sensitivity of this asset and the scale and nature of the proposals. Our assessment, as always, is mindful of the great weight provision set out in statute and clarified recently in case law. The relevant part of the Act 1990 being Section 66(1) sets out the general duty as respects listed buildings in exercise of planning functions. This section of the Act requires the decision maker to: 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'
- 11.10 Our assessment has found that the Proposed Development would not cause harm to any heritage assets through change to their settings.
- 11.11 The new buildings are of a high quality, and would make a positive and appropriate contribution to the local context. The new development would introduce a coherent scheme to a Site which is presently unwelcoming; and encourage more pedestrian movement through the area.
- 11.12 In views towards the Site, the buildings would be a high quality, attractive new feature which would positively impact on visual amenity, and aid in wayfinding and the legibility of the townscape.
- 11.13 Therefore, we consider that the Proposed Development meets the criteria set out at Policies 7B (Design Amenity), 7C (Heritage) and 7.7 (Location and Design of Tall Buildings) of the London Borough of Ealing Development Management DPD (2013), as well as the relevant policies of the London Plan, NPPF and statutory provisions.

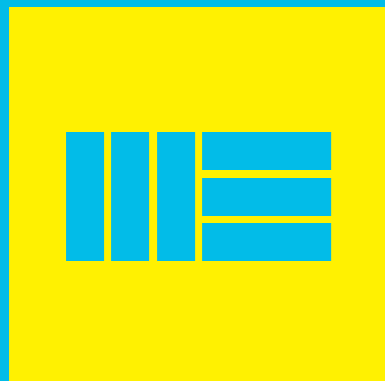


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