



Tavistock Works Heritage, Townscape & Visual Impact Assessment

March 2026

Prepared for: Linea UB7 Ltd

Prepared by: Levrant

Tavistock Works, Yiewsley, UB7 7QX: Heritage, Townscape & Visual Impact Assessment

© 2026 Heritage Architecture Limited, trading as Levrant. All rights reserved.

Copyright in this document as a whole is vested in Heritage Architecture Limited. Copyright in individual contributions, including referenced material, remains the property of their respective authors. No part of this publication may be reproduced, transmitted, stored in a retrieval system, or otherwise copied or disseminated, in any form or by any means (electronic, mechanical, photocopying, recording, or otherwise), without the prior written consent of Heritage Architecture Limited. Heritage Architecture Limited is registered in England and Wales 3053944 VAT Registration No. GB656883581

Correspondence Address: 62 British Grove, London, W4 2NL

Written by: CL/CJ

Checked by: MH

Issued: March 2026

Contents

1	Section 1: Introduction	4	10.1	Introduction	37
1.1	Aim of this Report	4	10.2	General Methodology	37
1.2	Summary of Planning Background and Context	4	10.2.1	Literature and Documentary Research Review	37
1.3	Authorship	4	10.2.2	Site Investigations	37
1.4	Overview of Relevant Legislation and Policy	4	10.3	Built Heritage Methodology	37
2	Section 2: Location, Setting and Heritage Assets	5	10.3.1	Baseline Assessment	37
2.1	Location and Setting	5	10.3.2	Assessing Heritage Significance	37
2.2	The Study Site	6	10.3.3	Assessing Impact	37
2.3	Heritage Assets	7	10.4	Visual Impact Assessment Methodology	38
3	Section 3: Characterisation Appraisal	11	10.4.1	Townscape Character Assessment	38
3.1	Townscape Character Areas: Introduction	11	10.4.2	Viewpoints	39
3.2	TCA 1: Study Site and Larger Plots	12	10.4.3	Visual Impact Assessment	39
3.3	TCA2: High Street and Station Road	13	11	Appendix III: References	41
3.4	TCA3: Winnock, Wimpole, Padcroft and Bentinck Roads	14	12	Appendix IV: Relevant Policy and Guidance	41
3.5	TCA4: Railway	15			
3.6	TCA5: Colham Mill Road	16			
4	Section 4: Identification of Key Views	17			
4.1	Introduction	17			
4.2	Key Views Map	18			
5	Section 5: Visual Impact Assessment	21			
5.1	AVR View 01: Tavistock Road Looking Northwest	21			
5.2	AVR View 02: Tavistock Road Looking Northeast	24			
5.3	AVR View 03: Colham Mill Road looking North	26			
5.4	AVR View 04: Junction Between Swan Road and Station Road	28			
5.5	Summary of Townscape Effects	30			
5.6	Summary of Visual Effects (Views)	30			
6	Section 6: Impact on Heritage Assets	31			
6.1	Impact on Heritage Assets	31			
7	Section 7: Impact on Townscape	32			
8	Section 8: Policy Summary and Conclusion	32			
9	Appendix I: Background and Evolution	33			
9.1	Evolution of the Townscape	33			
9.2	Map Regression	34			
10	Appendix II: Methodology	37			

1 Section 1: Introduction

1.1 Aim of this Report

The site (referred to hereafter as the 'study site') presently contains one building dating from the 19th century with several lean-to or lightweight adjoining structures. It is located in close proximity to Yiewsley town centre and West Drayton Train Station, both located in the London Borough of Hillingdon (referred to hereafter as LB Hillingdon).

This Heritage, Townscape Visual Impact Assessment ('HTVIA') has been prepared on behalf of Linea UB7 Ltd to act as an independent assessment of the impact of a scheme (referred to hereafter as the 'scheme') on the heritage and townscape. It accompanies the submission of a planning application for a slightly revised scheme since the previously approved S.73 permission (ref: 35810/APP/2024/1651). The proposals are for the:

"Demolition of existing building and replacement with 6-storey building comprising residential units, landscaping and amenity space".

The proposal seeks to amend the design permitted in the latest S.73 permission (2024) by reducing the height of the proposed development by two storeys to six storeys with rooftop amenity space. This in turn would reduce the number of units in the scheme from 38 to 31 overall.

There are four listed buildings, and six non-designated heritage assets in the vicinity of the study site. The significance of these heritage assets has been assessed in Section 2.3 as well as the heritage impact from the proposal. The study site also stands within an Archaeological Priority Zone ('APZ'), which will not be addressed as part of this HTVIA.

The characterisation appraisal (Section 3) considers the surrounding area, as a means of informing and assessing the scheme within its building context. This assessment resulted in the recommendation of several key views that have been developed by Rock Hunter, and these form the basis of the visual impact assessment in Section 5. This baseline remains unchanged since our assessment in 2024 which was approved as part of the previous S.73 permission (ref: 35810/APP/2024/1651).

The assessment methodology for the assessment of significance of heritage assets, of heritage impact, and townscape and visual impact assessment is set out in Appendix II.

The assessment includes:

- Overview of the site and heritage assets
- Characterisation Appraisal of the surrounding context
- Identification of Key Views
- Assessments of Heritage, Townscape & Visual Impacts
- Conclusion

The historic background of the site and surrounding area can be found in Appendix I:

- Historic background of Yiewsley and West Drayton
- Map Regression

This document is to be read in conjunction with the architectural drawings and design and access statement ('DAS') prepared by AIRC Design, for and on behalf of Linea UB7 Ltd.

1.2 Summary of Planning Background and Context

The applicant undertook three pre-applications with LB Hillingdon between 2017 - 2019. The planning application was submitted/validated on 24th March 2021 and received the decision notice (refused) on 25th June 2021 (Ref: 35810/APP/2021/1234). This application was permitted at appeal on 21st September 2022 (Ref: APP/R5510/W/21/3288333); subject to a series of conditions and s106 Legal Agreement. Further S.73 amendments were submitted in 2024 and approved (Ref: 35810/APP/2024/1651).

The Padcroft Works site, adjacent to the site, gained planning permission for the development of 308 flats and offices in 2015 (Ref; 45200/APP/2014/3637). This building has now been completed with Fitzroy Court being the southern-most block of Padcroft Works, adjacent to the study site.

The Comag site, also adjacent to the study site, received planning permission for the erection of 104 flats and community space (Ref: 24843/APP/2018/269). This demonstrates the scale of development the Council has previously found to be acceptable, within the same allocated site and area. A new application for this neighbouring site was submitted in July 2022 and approved in June 2024 (Ref: 24843/APP/2022/2403).

1.3 Authorship

This HTVIA has been drafted to accompany this application. It has been prepared by Levrant. We are a specialist practice of conservation architects, surveyors, planners and heritage consultants which focuses on the historic environment. The authors of this assessment were:

- Vicky Webster, IHBC, MSc Historic Building Conservation, BA (Hons) – Associate Historic Building Consultant
- Claire Jackson, MSc Historic Building Conservation, BA (Hons) – Historic Building Consultant

1.4 Overview of Relevant Legislation and Policy

Relevant National Policy and Legislation

This document was carried out considering up-to-date national and local policy, including:

- Planning (Listed Buildings And Conservation Areas) Act 1990
- National Planning Policy Framework (NPPF) (2024)

Relevant National Guidance

- National Planning Policy Guidance (PPG) (2024)
- Conservation principles, policies and guidance for the sustainable management of the historic environment, English Heritage, April 2008
- Good Practice Advice in Planning, Historic England (GPAs):
 - *Planning Note 3: The Setting of Heritage Assets* (December 2017)
- Advice Notes, Historic England (HEANs)
 - *Note 12 - Statements of Heritage Significance: Analysing Significance in Heritage Assets* (October 2019)
- Landscape Institute and IEMA, *Guidelines on Landscape and Visual Impact Assessment (GLVIA3)* (3rd Edition, 2013); Landscape Institute and IEMA, *Technical Guidance Note LITGN-2024-01* (August 2024)

Relevant Regional and Local Policy, and Guidance

- *London Plan* (2021)
- Hillingdon Council's:
 - Local Plan Part 1: Strategic Policies* (November 2012)
 - Local Plan Part 2: Development Management Policies* (January 2020); *Site Allocations and Designations* (January 2020)

2 Section 2: Location, Setting and Heritage Assets

2.1 Location and Setting

The study site is located to the west of Yiewsley High Street and just north of the railway line which serves the nearby West Drayton Station.

The study site occupies a rhomboid-shaped plot which comes to a corner on its eastern side at the junction between Tavistock Road and Garret Place. It is enclosed to the north by the Padcroft Works Development (with the closest block of that development to the north of the study site being Fitzroy Court) and bounds Tavistock Road to the south. To the west is another allocated site, Site B: COMAG I. Opposite the study site to the south, is land which bounds the railway, and then the Railway.



Figure 1: Map of the study site and its immediate environs with the allocated with/Padcroft Works Development visible to the north and east and Allocated Site B: COMAG I site visible to the west

The study site sits within a contained pocket of urban townscape which is defined by landscape features and pieces of infrastructure, namely, the Railway to the south; Fray's River to the southwest; the Grand Union Canal to the north; and Yiewsley High Street to the east. These barriers isolate this pocket of urban form (indicated with a dashed green line in Figure 2).

Part of this pocket of townscape has experienced a change in townscape terms. The eastern and northern edges of the contained pocket (bordering the canal and the High Street) now consists of late 20th century and 21st century medium rise, largely residential buildings. The closest of these is the Padcroft Works Development, which borders the study site to the north and is a recent building of no particular architectural merit. It is not regarded as a detrimental element in the townscape, but is rather a "background" building, making a neutral contribution to townscape and setting.

Other developments of a similar size and scale can be found in the wider area too, such as near West Drayton Station and further east along the canal.

Further west of the site (moving away from the town centre, and beyond the Allocated Site B: COMAG I site) the townscape in the urban pocket is smaller in scale, with low-rise residential buildings and some light industrial buildings (also low-rise) in the smaller streets between Tavistock Road and the Grand Union Canal.



Figure 2: Map of the study site showing the urban pocket (pale green dashed line), and including the railway to the south, Fray's River to the southwest, the Grand Union Canal to the north, and Yiewsley High Street to the east.

2.2 The Study Site

As determined in the map regression (Appendix I), the study site was first developed between 1868 and 1912.

The main building on the study site, which appeared in in 1912 map, remains on the site today. As is marked on the 1912-1913 map in the map regression (Appendix I), the building and site were constructed as a printworks which became a magazine distribution centre in the latter years of the 20th century. The main building on site housed offices.



Figure 3: Aerial photographs of the study site (source: above, Design and Access Statement by Create; below, Google Earth)



Figure 4: The study site showing the late-19th century former printworks building (with later alterations).

Full site access was not possible on the initial and subsequent site visits, but aerial photography (Figure 3) shows that the other smaller outbuildings that appeared on the map in 1938 – 1943 do not match the other buildings on the site today. Instead, a lightweight, single-storey structure exists to the north of the main printworks building and an open yard area occupies the west of the study site.

The main building on the elevation which fronts Tavistock Road is non-descript and whatever integrity it may have had has now been eroded by the poor-quality alterations. These include uPVC windows at first floor level and alterations at ground floor that have blocked up previous large openings. There are three large bricked-up areas, leaving small, partially fixed casement windows at high-level, with window bars added. An additional doorway opening on the main elevation has also been bricked up (Figure 4). The result is to eliminate any engagement with the street, resulting in an inhospitable façade excised by poor-quality workmanship. Similarly, the east elevation is visible from the street and offers a similarly poor-quality façade with little engagement with the streetscene and untidy guttering and brickwork. As the rest of the site is not visible from the streetscape this elevation of the main building makes up the entire contribution of the study site to the surrounding townscape. Its contribution is clearly negative, for the reasons just described.

2.3 Heritage Assets

The study site does not contain any heritage assets and does not fall within a conservation area. A radius of 500m has been selected as the study area in terms of heritage assets.

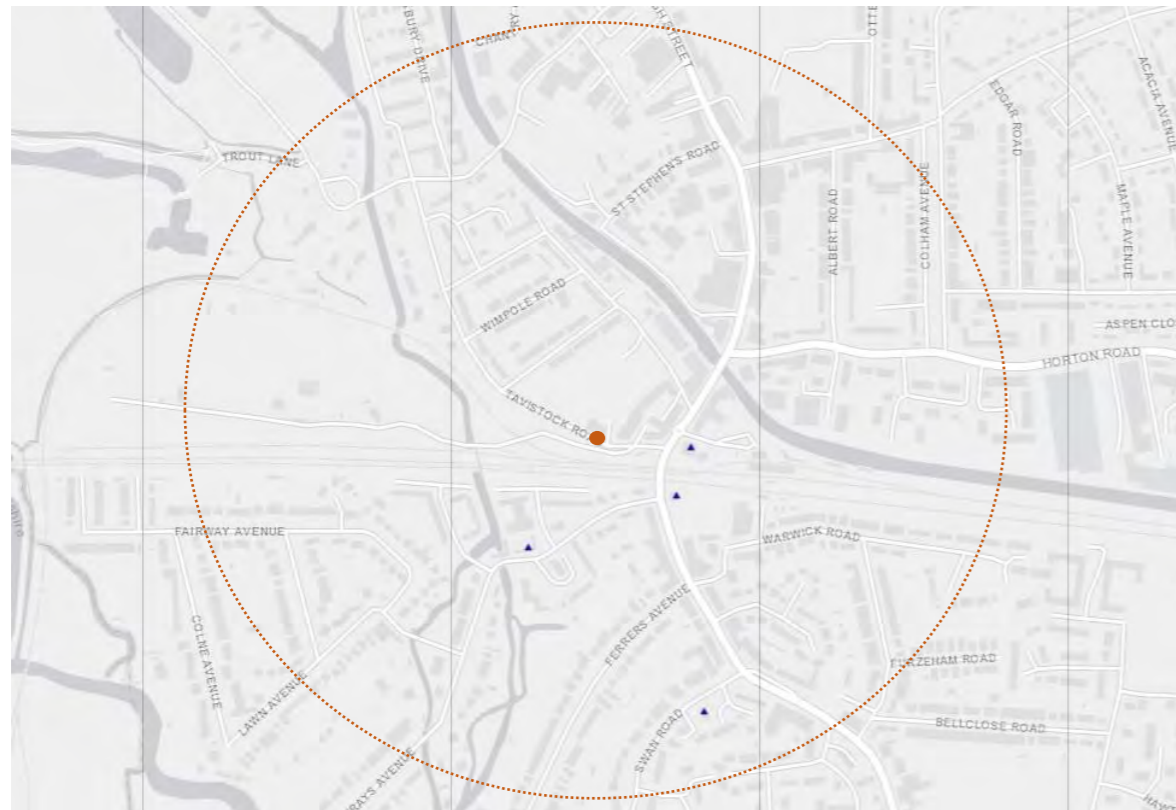


Figure 5: Statutorily listed heritage assets (blue triangles) within 500m of the study site (marked in red, approximate 500m radius marked in orange) (source: Historic England)

The De Burgh Arms Public House, Grade II



Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
Evidently historic construction (late-16 th century) - High pitched tiled roof with three symmetrical gables and two wings unified at the front range. Medium	Some historic connection with the De Burgh family of West Drayton who owned the manor and rectory from the 18 th century. Medium	None.	Medium	None (not visible)

Setting: Its setting comprises the road and rail infrastructure, and 19th and 20th century development along Station Approach. The line of the road and railway contribute to its setting, as does the Railway Arms (Grade II) on the other side of the tracks. The building is best appreciated from Station Approach, looking east. The study site is located to the west.

The Railway Arms Public House, Grade II



Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
Attractive early-19 th century villa with iron columns supporting a	Some historic interest for its association with the railway station.	None known.	Medium	None (not visible)

balcony at first floor,
large, elegant sash
windows at 1st floor.

Medium.

Setting: Its setting comprises the road and rail infrastructure, and 19th and 20th century development along Station Approach. The line of the road and railway contribute to its setting, as does the De Burgh Arms (Grade II) on the other side of the tracks. The building is best appreciated from Station Approach, looking east. the study site is located to the west.

Offices of the Valentine Varnish and Lacquer Company, Grade II



Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
A group of joined ranges, including a two-storey 18 th century building with a tall, hipped roof in a Mannerist style, and a longer building with a mansard roof with a more industrial appearance. Medium	Surviving of pre-19 th century industrial building – rare in the area. Originally Colham Flour Mill, the buildings were sold to Valentine Varnish and Lacquer Co, in 1971. Medium	Colne Valley APZ - Medium	Medium	None (not visible)

Setting: Its setting comprises the modern and historic road network and the stream with weir. The courtyard around which the buildings are arranged; line of the historic road - Colham Mill Road - and the stream contribute to its setting. The modern housing developments do not contribute. The building is best appreciated from Colham Mill Road, looking north and from Humber Close, looking south-west. The study site is located to the north-east.

The Old Post Office, Locally Listed



Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
1930s building with Arts and Crafts and Neo-Tudorbethan influences - brick mullioned windows and steep pitched roof. Low-medium.	Housed the former post office. Low.	Colne Valley APZ. Medium.	Low-Medium.	None (not visible)

Setting: Its setting comprises the historic road network – Station Road and Swan Road - and development along Station Road. The line of the historic roads contribute to its setting, as does the contemporary 1920s and 30s development. The later 20th century developments do not contribute. The building is best appreciated from Station Road, looking west. The study site is located to the north.

1 Swan Road, Grade II



Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
18 th century house with large sash windows and pitched roof with raised parapet on front elevation. Medium	Interest as part of the 18 th century development of the area. Medium	Colne Valley APZ - Medium	Medium	None (not visible)

Setting: Its setting comprises the historic road network, and predominantly 20th century development along Station Road and Swan Road. The historic line of the two roads contributes to its setting, whilst to a lesser extent the early-20th century / interwar development along Station Road contributes. The modern housing around the property do not contribute. The building is best appreciated from Swan Road, looking east. The study site is located to the north, north-west.

Foundation stone for Colham Wharf outside Harrier House, Locally Listed



Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
Engraved stone – Low.	Colham Wharf building was originally constructed in 1796 and is a relic of the industrial past of this part of the town (ref Figure). Low	Colne Valley APZ- Medium.	Low-Medium	None (not visible)

Setting: Its relocated setting is on the boundary wall of a housing development, adjacent to the canal. Its setting now comprises the historic road and canal network, and predominantly 20th century development along High Street. The historic line of the canal contributes to its setting. The modern housing attached to and around the stone does not contribute.

Key House (Former Town Hall), Locally Listed



Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
Old Town Hall c1930. Free Classical composition. Low-medium.	Designed by John Soutar (architect renowned for Hampstead Garden Suburb work). Links to the Yiewsley & West Drayton Urban Council. Low-medium.	None.	Low-medium.	None (not visible)

Setting: Its setting comprises the road network (High Street), and the predominantly 19th and 20th century development along the High Street. The historic line of the road contributes to its setting, as does the Church to the southwest. The building is best appreciated from the High Street, looking north to its principal elevation. The study site is located to the south-west and the proposed development would not be visible.

Garden City, West Drayton, Area of Special Local Character

Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
Suburb where layout and building design follows the Garden City movement philosophy on character and design - Buildings composed as unified groups, large plots, greenery, buildings of horizontal form. No listed buildings or non-designated heritage assets contained within this area.	Interest as part of the early-20 th century development of the area. Medium-Low	Sits within the Colne Valley APZ – Medium.	Low-Medium	None (not visible)

West Drayton Station, Locally Listed



Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
Late-Victorian station building in stock brick in an Italianate style. Low-Medium.	Not the original station, so not linked to the construction of the Great Western Railway line (which opened in 1838). Medium - Low.	None.	Low-Medium.	None (not visible)

Setting: Its setting comprises the historic rail and road network, and predominantly 20th century development along Station Approach / High Street. The railway line and to a lesser extent the road / apron serving the station contribute to its setting. As do the nearby public houses – both Grade II-listed. The modern housing around the property do not contribute. The building is best appreciated from Station Approach, looking south. the study site is

Former Methodist Chapel (Church of St Matthew), Locally Listed



Architectural and Artistic Interest	Historic Interest	Archaeological Interest	Overall Significance	Contribution of study site
Victorian building in a modest gothic revival style with polychromatic brickwork. Low-medium.	Housed local community church services. Low	None.	Low-Medium.	None (not visible)

Setting: Its setting comprises the road infrastructure (High Street), and the predominantly 19th and 20th century development along the High Street. The historic line of the road contributes to its setting, as does the school complex to the rear (west), the former town hall (Key House) to the northeast. The building is best appreciated from the High Street, looking west to its principal elevation. The study site is located to the southwest and it is unlikely¹⁰ that the proposed development would be visible from the south porch; due to mature planting and intervening modern development (including Padcroft Works).

located to the west.

Colne Valley Archaeological Protection Zone

The study site is located within the Colne Valley Archaeological Protection Zone ('APZ'). It is out of scope of this assessment to consider the potential impacts on archaeology. Because the site is located within the APZ, meaning that there may be potential for archaeological finds on the site, LB Hillingdon may consider applying an archaeological watching brief (or similar) as a planning condition.

3 Section 3: Characterisation Appraisal

3.1 Townscape Character Areas: Introduction

In order to carry out an assessment of impact of the scheme on the surrounding townscape, the surrounding area has been broken down into a set of Townscape Character Areas ('TCAs'). These TCAs have been defined by a set of unifying factors. These factors can vary but often include aspects of building character such as building form, age, design, use, size and scale; aspects of layout, such as route network, plot pattern, traffic intensity and can also include other features which contribute to the overall experience of a place such as greenery or openness.

LB Hillingdon commissioned the '*Hillingdon Townscape Character Study*' which was prepared by Allies and Morrison. It was published in 2013 and is a material consideration. Rather than breaking the LB of Hillingdon into character areas or zones, the '*Hillingdon Townscape Character Study*' considers the borough as a whole and defines a set of 16 'Character Types', to describe the different townscape characteristics. Several of the character types, as described in the '*Hillingdon Townscape Character Study*' share considerable overlap with the defining characteristics of some of the TCAs described in this section. As such, the '*Hillingdon Townscape Character Study*' shall be referenced in the following text.

The TCAs were drawn up in 2021 following the initial site investigation. This appraisal was reviewed in 2024 and again in 2026 with further visual inspection, confirming that the baseline assessment has not changed.



Figure 6: Townscape Character Area Map identifying 5 character areas surrounding the study site.

3.2 TCA 1: Study Site and Larger Plots

Listed as 'Apartments' in *Hillingdon Townscape Character Study*, this character was emerging at the time that the character study was published, and this typology has become much more prevalent in the area in the intervening 10 years. The character study does anticipate this increase in development stating that:

"Although Hillingdon is known for low density suburban housing there are a growing number of apartment buildings, particularly in urban centres in locations with strong transport connections."

The main characteristics of this TCA are:

- Buildings with large footprints
- Mid-high rise building height
- Modern apartment block typology of residential buildings
- Greater variation of materials (glazing and metal cladding in higher proportions relative to the amount of brick)
- Large, open plots allocated but as yet un-developed (including the study site and neighbouring COMAG I site)
- Largely comprises of common components and characteristics

The **value** of this TCA is: **Medium**

The **sensitivity** of this TCA is: **Medium**



Figure 7: (top left): 21st century developments of Union Wharf on the right and Waterways House on the left; (top right): Padcroft Works Development including the gated-off Garnet Place; (bottom right): study site which is currently largely open with one small existing building; (bottom left): hoarding and open space above COMAG I site (2024-2026).

3.3 TCA2: High Street and Station Road

At the time of writing, the *Hillingdon Townscape Character Study* assigned the Yiewsley/West Drayton High Street under its 'Secondary Centres' character type. The description for this character type states that:

"The common features of these centres are that they provide a good mix of shops and services at a local level, enabling people to meet their regular weekly needs. They are sufficiently large to support banks and other services, but one would not normally expect to see any significant comparison (i.e., non-food) shopping."

And it acknowledges that:

"Hayes and West Drayton are likely to undergo significant change due to the construction of Crossrail. This will lead to pressure for more intense development and taller buildings..."

The description as set out in the character study remains applicable, despite the arrival of Crossrail, although the transport hub itself has been notably upgraded.

The main characteristics of this TCA are:

- Early-20th century terraces
- Low-rise buildings (two or three storeys)
- Commercial use (typically at ground-floor only with residential use above)
- Occasional historic buildings which pre-date the early 20th century commercial, these are typically listed or locally listed
- General overall cohesion in built form with the occasional larger residential buildings (for example near the bridge over the canal), interrupting this overall form and scale
- Predominant materials are brick, with some render
- Facias, signage and awnings are prominent at ground-level relating to commercial use
- Busy thoroughfare, proximity to traffic
- Occasional street trees

The **value** of this TCA is: **Low-Medium**

The **sensitivity** of this TCA is: **Low-Medium**



Figure 8: (top left): The Railway Tavern (Grade II); (top right): early 20th century buildings with shopfronts at ground level on Yiewsley High Street; (bottom left and right): early 20th century buildings with shopfronts at ground level on Station Road (2024).

3.4 TCA3: Winnock, Wimpole, Padcroft and Bentinck Roads

Described as 'Urban Terraced' in *Hillingdon Townscape Character Study* and, to a lesser extent, 'Industrial / business'.

The main characteristics of this TCA are:

- Late 19th /early 20th century (likely Edwardian) terraced houses
- Early-20th century former light industrial units (now in commercial or residential use)
- Post-war terraced housing
- Some later 20th century in-fill residential buildings
- General cohesion overall, but some variety – the terraces/ houses are not uniform and date from different periods or are of different designs – further to this are the infill and surviving ex-industrial buildings

The **value** of this TCA is: **Medium**

The **sensitivity** of this TCA is: **Medium**



Figure 9: (top left): late-19th century/ early-20th century houses on Wimpole Road; (top right): early-20th century light industrial building with modern cladding on Bentinck Road; (bottom right): early-20th century light industrial buildings on Bentinck Road; (bottom left): late-19th century/ early-20th century houses on Wimpole Road (2024).

3.5 TCA4: Railway

This character is situated in-between the railway and associated land. It is considered its own character area due to the way in which it divides different areas. Rather than intersecting between existing townscape, the railway pre-dates much of the townscape in the area. This means that later development evolved in pockets created by and around the large piece of infrastructure. This has also meant that the railway consists of vacant or underused land around it, including the large area on Tavistock Road where the original West Drayton Station once stood (refer to 1868 Map in Figure), which is now partially an access route, and partially covered in dense foliage.

The main characteristics of this TCA are:

- Impermeable boundaries (e.g., fencing), sometimes with foliage beyond
- Openness above and next to the railway, allowing for occasional views across
- Hard landscaping
- Infrastructural items (bridges, railings etc).

The **value** of this TCA is: **Low**

The **sensitivity** of this TCA is: **Low**



Figure 10: (top left): view along Tavistock Road showing large area of foliage-covered land which adjoins the railway; (top right): view from footbridge at West Drayton Station looking west; (bottom centre): view from corner of High Street and Tavistock Road looking south under railway bridge and showing raised embankment.

3.6 TCA5: Colham Mill Road

Character Area 5 consists of low-rise residential development including a mix of semi-detached Edwardian houses and some more modern small blocks of low-rise, medium density housing. In the *Hillingdon Townscape Character Study* part of Colham Mill Road is described as having a cul-de-sac character type.

The main characteristics of this TCA are:

- Residential typology in two dominant phases: early-20th century (Edwardian) and late-20th century
- Low-rise
- Low-density on historic buildings, low-medium density on 20th century buildings
- Occasional historic built fabric (i.e., Former Colham Mill / Offices of the Valentine Varnish and Lacquer Co, and some semi-detached houses)
- Modern housing developments do not mix particularly well with the historic built form in design, and the cul-de-sac layout is quite different from the surrounding street pattern
- Quiet, suburban feel with lots of greenery, benefits from proximity to Fray's River and associated greenery
- Negative impact from passing trains on the elevated railway lines

The **value** of this TCA is: **Low-medium**

The **sensitivity** of this TCA is: **Low-medium**



Figure 11: (top left): low-rise late 20th century residential houses on Humber Close; (top right): 18th century Offices of the Valentine Varnish and Lacquer Co (Grade II), (bottom right): Edwardian semi-detached houses on Colham Mill Road; (bottom left): semi-detached late-20th century houses on Colham Mill Road (2024-2026).

4 Section 4: Identification of Key Views

4.1 Introduction

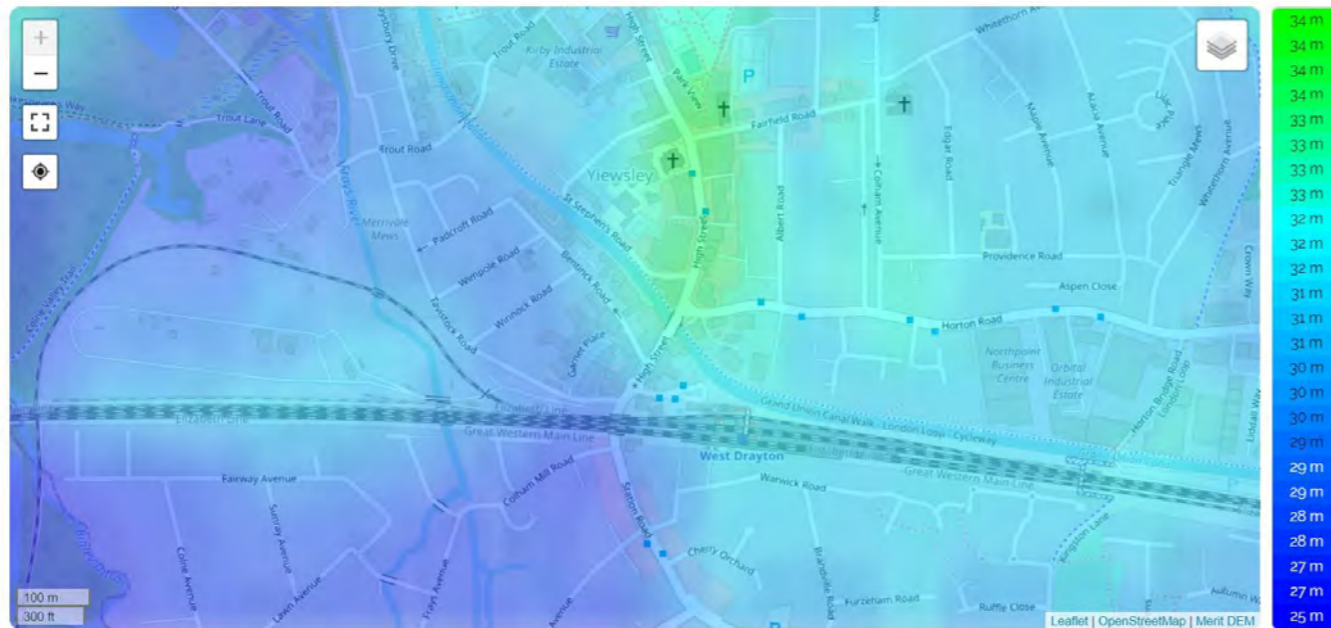


Figure 12: Topographical map of the area (source: <https://en-gb.topographic-map.com/maps/sdsv/California/>).

A study was undertaken to establish a set of initial potential key local viewpoint locations from which 'before' views are provided to better understand the baseline conditions. This has included a combination of desk-based study and on-site investigations. The desk-based included a topographic map to determine the theoretical visibility of the scheme (Figure 12). As can be seen from the topographic map, the area is very flat; the only slightly raised area is on Yiewsley High Street to the northeast of the study site. Owing to the intervening built development both on the high street, and that which immediately bounds the study site to the northeast (Padcroft Works Development), it was deemed that a view from the High Street would not be necessary from this area.

The presence of the Padcroft Works Development provided a very helpful visual marker for where the scheme would appear within the townscape. This was taken into consideration during the site investigations when assessing the area for potential views. Given the low-rise and possibly sensitive nature of the built form to the east of the study site (including Winnock Road, Wimpole Road and Padcroft Road), careful consideration was given to the possibility of views from this area. From these streets it was not possible to see the Padcroft Works Development from street level, except in the occasional gap in the roads closest to the site: Bentinck Road and Winnock Road. Furthermore, the consented COMAG I scheme will stand between Winnock Road, Wimpole Road and Padcroft Road and the study site – concealing the site from this view. As a result of these factors, a view from this area was scoped out of the assessment. In addition to these factors, the way in which Tavistock Road curves at the point where the historic terraces begin means that there is very limited visibility from in front of the residential houses towards the site. A view from the closest possible location to these streets where the scheme would be visible was selected for assessment. This location is shown in View 02.

As a result of the flat topography of the area, the key views have been chosen where the scheme is likely to be visible on the open approaches towards the site and across other areas of lower-lying townscape. Views have also been chosen considering heritage assets as well as on the streetscape, scale, height, urban grain, significant skyline views, landmark buildings and important local views and prospects.

This view selection has not changed since the initial and subsequent assessments as the baseline appraisal remains the same. The previous S.73 permitted scheme has been considered as part of the VIA.



Figure 13: View from Winnock Road looking towards the study site – the red hoarding surrounding the COMAG I development is visible. The presence of the COMAG I development would mean that the study site would be completely obscured in this view.



Figure 14: View from Wimpole Road looking towards the study site, the relative distance, the presence of the existing townscape and the presence of the COMAG I development would mean that the scheme would not be visible in this view.



Figure 15: View from Padcroft Road looking towards the study site through a gap in the townscape. The relative distance and the presence of the COMAG I development would mean that the scheme would not be visible in this view.



Figure 16: View towards the study site in front of the historic residential houses at the junction of Wimpole Road. The way in which Tavistock Road kinks at the point that the historic residential housing starts means that the scheme would not be visible from this area.

4.2 Key Views Map



Figure 17: Key Views Map identifying four views. Views 01 and 02 located on Tavistock Road, View 03 on Humber Close and View 04 on Station Road.



Figure 18: View 01 Existing.

This view is taken from Tavistock Road near the junction with Garnet Place looking directly towards the study site at close proximity. View 01 is located in TCA 1: Study Site and Larger Plots. The study site takes up most of the centre of the view and the focal point of the view is the run-down building on site and the section of hoarding in front of it. To the left of the building on the study site is an area of open sky and some low-rise buildings visible in the distance. To the right of the view is the Padcroft Works Development and specifically the block known as Fitzroy Court, which extends upwards into the sky and represents the changing nature of the area in townscape terms, the largely blank, faceless south elevation of the development is unengaging and appears dominant due to the lack of features. The building thus turns its back on the street and the cliff of unrelieved brickwork is oppressive and detrimental to the streetscape. The curve of built form to the right of the frame alludes to the internal courtyard within the development, faced with eight storey buildings in a composition. On the left of the view is greenery on the land that borders the railway, which provides a soft edge to the street with an attempt at a bosky verdant interlude. Further hoarding can be perceived to the rear of the study site alluding to the COMAG I site. The view along Tavistock Road is not of any local interest and its townscape is of poor quality.

The view does not receive a high level of footfall. The main receptors of the view will be residents walking from West Drayton Station to their houses, although this route appears to be more frequented by motorists than pedestrians, who have a lower receptor sensitivity. Tavistock Road is not the only access to Winnock Road, Wimpole Road and Padcroft Road from the town centre - the most direct access route from the shops on Yiewsley High Street is via Bentinck Road. Therefore, Bentinck Road has a higher level of pedestrian footfall.

Value of the view is: low.

Sensitivity of the view is: low.



Figure 19: View 02 Existing.

This view is taken from Tavistock Road opposite to the junction with Winnock Road. The view looks northeast towards the study site at a moderately close range. View 02 is situated on the border of TCA 3: Winnock, Wimpole, Padcroft and Bentinck Roads, looking into TCA 1. On the left and right of the image are Winnock Road and Tavistock Road, respectively. The greenery on the land that borders the railway takes up a third of the view on the right-hand side. In the centre of the image is the red hoarding around the COMAG I site and the numerous, and somewhat disparate, forms of the Padcroft Works Development are visible above the hoarding in the middle-further distance. Above the Padcroft Works Development is open sky. The townscape is disorganised and incoherent and of low value. As with view 02 there is some townscape value to the bosky verdant border of the railway which softens the vista and adds an element of natural landscape. Other than the colour of the hoarding, this view has not changed.

As with View 02, the main receptors of the view will be residents of Winnock Road, Wimpole Road and Padcroft Road, leaving the area by car, or walking from their houses to West Drayton Station. Similar to View 02, the preferred pedestrian route to Yiewsley High Street appears to be via Bentinck Road.

Value of the view is: low.

Sensitivity of the view is: low.



Figure 20: View 03 Existing.

This view is taken from Humber Close, near the junction with Colham Mill Road, looking north towards the study site. The viewpoint is located in front of the Offices of the Valentine Varnish and Lacquer Co (Grade II), now flats. View 03 is also located in TCA 5: Colham Mill Road. The view takes-in Humber Close thoroughfare in the near and middle distance, and the modern low-rise apartment blocks on Humber Close. These buildings make up the majority of the view appearing on the right in the foreground and in the middle distance. Beyond the further of these buildings, a projecting block of the Padcroft Works Development is visible, as well as some overhead line infrastructure associated with the intervening railway. This infrastructure is more prominent in the winter months when there are no longer leaves on the trees in this view. Further left still in the view is some greenery and an early mature tree. Changes to this will impact the setting of the designated asset (out of frame), yet the townscape is unremarkable, and not of particularly high quality.

The receptors that are likely to experience this view are somewhat limited to those that reside in the residential properties around Humber Close, which is a no-through road. Colham Mill Road is a through-route, but this view does not sit within the direction of travel for pedestrians or vehicle users passing along the street.

Value of the view is: low.

Sensitivity of the view is: low.



Figure 21: View 04 Existing.

This view is taken from Station Road, opposite the junction with Swan Road, looking north towards the study site. View 04 is situated in TCA 2: High Street and Station Road. On the left of the view is the Old Post Office (locally listed) and on both sides of the view, lining the thoroughfare are low-rise historic commercial buildings, most dating from the early 20th century. The townscape descends in an even, depreciating line towards the vanishing point, where the Padcroft Works Development is visible projecting into the sky. This is not a protected view nor is it mentioned in local policies, but the townscape is of a similar character and is largely consistent in terms of form, materiality and rhythm.

The visual receptors are likely to be pedestrian shoppers. This part of Station Road is some distance from the railway station, so pedestrians here are more likely visiting the area for errands and recreation, so will have a higher sensitivity than individuals on their daily route to work/ travelling.

Value of the view: low-medium.

Sensitivity of the view: low-medium.

5 Section 5: Visual Impact Assessment

5.1 AVR View 01: Tavistock Road Looking Northwest



Figure 22: View 01 Baseline (Permitted (2024)).

Permitted

The scheme appears in the centre of the view and represents a notable degree of change due to the increase in built form visibility. Whilst the scheme protrudes upwards, further enclosing the amount of the sky visible, the view is not protected and is of low townscape value. The proposed development covers a largely flank wall in the Padcroft Works Development, replacing it with an active and engaging elevation, which enhances the streetscene while corresponding well with the prevailing townscape. The southern elevation too has improved engagement at ground and first floor, with recessed and projecting elements to form an articulated fenestration.

The additional two storeys added to the proposed development in 2024, on the southeastern section of the building, are just glimpsed by, and partially behind, the vegetation in the foreground of this view. This part of the building is situated closest to the receptor and some of the additional height extends past the frame of the view. The additional height brings the southeastern section of the building. The slight increase in height and massing to this section of the building improves the cohesion of the design and creates a consistent, symmetrical form. The additional height also enhances the relationship between the proposed development and the surrounding urban context, the design complimenting the scale and existing character of the Padcroft Works Development visible to the right of the frame. Though situated closer to the frame, the proposed development is read at a similar height to the neighbouring plot. The proposed change to the balconies from the permitted scheme is minor. The open glazed amenity space provides some visual interest to the front and side elevations, breaking up the overall massing several times with this articulation. The balconies also visually relate to the design feature on Padcroft Works Development. The white brick central core reflects the materiality of the proposed development, local character and built form and visually separates the two ends of the building again breaking up the overall massing.

The additional height in this view continued to better relate to the streetscape changing the impermeable boundary (seen in the existing view) into something relatable and residential.

Magnitude of impact is: low beneficial.



Figure 23: View 01 Proposed.

Proposed

The scheme in this view is of six storeys and thus a reduced overall height of two storeys. More of the scheme therefore fits within this close framed view. The height remains consistent across the proposed development, retaining the vertical feature which is one storey taller than the adjacent wings and continues to visually break up the massing of the scheme. This core would be centralised, creating a symmetrical composition. Though it cannot be fully appreciated in this view, the proposed height would still be in keeping with the neighbouring Padcroft Works Development, fitting in with the height datum set by this development. The proposed change to the balconies is minor and improves the rhythm of the south elevation. The additional planting and private amenity at ground floor enhances the relationship between the proposed development and the public realm. The form, style and architectural features continue to visually relate and correspond with the existing townscape character, the reduced height improving the domestic and relatability of the scale of the proposed development to the overall streetscene.

Refer to Figure 24 for an extended view of the proposal showing the reduced height (by two storeys) of the proposed development. It provides some reference to the height of the proposal in its mid-tall rise residential context.

Magnitude of impact is: low beneficial.



Figure 24: View 01 Proposed extended 17mm view showing the upper floors of the proposal (reference only).



Figure 25: View 01 Cumulative.

Cumulative

The consented COMAG I scheme appears to the left of the scheme in the background of this view. A relatively small amount of the scheme will be visible from this viewpoint, the amount increasing as the receptors walks along Tavistock Road. The reduced height of the proposed development means the upper storeys of the COMAG I scheme can be read as slightly taller from this view. The existing grain extends across the development to the cumulative scheme. The buildings create a continuous frontage and offer a consistency of form, scale and articulation across the built form and to this part of Tavistock Road. The balconies on the proposed development are experienced alongside a similar design feature on the COMAG I scheme enhancing the visual relationship between the developments. The limited change of scale and height preserves the existing character in the view and thus the overall impact of the proposed development in this cumulative view.

The magnitude of cumulative impact is: low beneficial.

5.2 AVR View 02: Tavistock Road Looking Northeast



Figure 26: View 02 Baseline (Permitted (2024)).

Permitted

The scheme appears on the right of the view, alongside the Padcroft Works Development. It takes up a small proportion of the view, and a relatively small portion of the scheme is visible. Its overall height is similar to that of the adjacent Padcroft Works Development. The overall change to the view is minimal, especially in relation to the size and scale of the Padcroft Works Development which has many different blocks and elements presenting as a group of discordant forms rather than a balanced or rationalised group. The flanking wall of the permitted development visually relates to the flanking walls experienced in the Padcroft Works Development.

Magnitude of impact is: negligible.



Figure 27: View 02 Proposed.

Proposed

From this viewpoint location, there is very limited perceived change from the baseline permitted scheme. The flank wall and a small proportion of the Tavistock Road elevation will be visible and the height of the scheme of the proposal still visually relates with the neighbouring Padcroft Works Development, though at a reduced height. The vegetation lining the railway also further obscures the upper storeys of the proposal. The proposed roof garden may be understood, but this is in keeping within its townscape context and the perceived roof amenity space in the Padcroft Works Development.

The COMAG I site remained a cleared site and is poised for construction. Therefore, this proposed view, as with the previous schemes on the study site, is unlikely to be experienced. In such case, the cumulative view for View 03 is more salient in representing impact of the proposed development from this location.

Magnitude of impact is: negligible.



Figure 28: View 02 Cumulative.

Cumulative

The presence of the COMAG I scheme in this view represents a major change. The cumulative scheme entirely obscures the view of the Padcroft Works Development and largely obscures the view of the proposed development. Whilst the lower floors of the scheme are just about visible in this view, the impact of the COMAG I scheme obscures any changes to the scheme at the upper storeys and minimises any impact incurred as a result of the scheme.

Magnitude of cumulative impact is: none.

5.3 AVR View 03: Colham Mill Road looking North



Figure 29: View 03 Baseline (Permitted (2024)).

Permitted

The upper storeys of the scheme appear above one of the residential buildings on Humber Close in the distance. It stands between the Padcroft Works Development and the viewpoint and wholly obscures the Padcroft Works Development in this view. Two additional storeys were added to the southeastern end which increased its height to match the permitted height of the rest of the proposed development. This in turn created a more cohesive scheme that was in keeping with the existing townscape in the vicinity of the study site. The lift overrun was permitted one storey taller than the adjacent built form to accommodate the access to the permitted garden and amenity space on the roof. This is a centrally designed feature that extends from the ground floor to the roof. It visually breaks up the massing of the building and provides interest to the front elevation. Instead of white render, the materiality of brick complements and responds to the local character and context, whilst visually breaking up the overall bulk and mass of the development.

Magnitude of impact is: negligible.



Figure 30: View 03 Proposed.

Proposed

The proposed changes in this view would perceptibly reduce the height and scale of the proposed development by two storeys. The majority of the development is concealed by the Humber Close properties in this view. The same form is proposed as what was permitted in 2024, with a centrally designed lift overrun feature that is one storey taller than the rest of the proposed development. Again, this additional height is for access purposes, to access the proposed roof garden area. Rather than a projecting feature in the sky, this form would now be read amongst the Padcroft Works Development in its background, which would sit at least a storey taller than the proposed development. The proposed development reads as slightly taller than the Humber Close development in the middle ground of this view, but very much within the bounds of the existing townscape and established character. The development would step in height starting with that on Humber Close and finishing with the Padcroft Works development in the background.

Magnitude of impact is: negligible.



Figure 31: View 03 Cumulative.

Cumulative

The blue wireline of the COMAG I scheme appears behind the existing Humber Close development in this view. The majority of the cumulative scheme is concealed behind the residential properties on Humber Close and the vegetation in the middle ground of the view. The small section of the cumulative scheme visible is similar in height, though slightly taller to the proposed development with the reduction of two storeys, which assists in consolidating the presence of tall built form in the background of this view.

Magnitude of cumulative impact remains: negligible.

5.4 AVR View 04: Junction Between Swan Road and Station Road



Figure 32: View 04 Baseline (Permitted (2024)).

Permitted

The scheme appears to the left of the Padcroft Works Development at the vanishing point of the view. It projects into the sky to a small degree, perceived at a similar height, scale, form and style to the Padcroft Works Development to its right. Due to the use of red brick on the scheme, it stands out less than the Padcroft Works Development which is notably different to the materiality of Station Road. The proposed lift overrun, owing to the choice of materiality, blends in with the sky making it a feature that is largely imperceptible. The presence of the scheme in this view is visible in the townscape, but it is not highly impactful. It does not alter the composition of the view with the townscape still noticeably descending towards the vanishing point on Station Road. The presence of the scheme also does not alter the viewer's appreciation or understanding of the existing townscape in any detrimental way.

Magnitude of impact is: negligible.



Figure 33: View 04 Proposed.

Proposed

The proposed development as with the permitted scheme would be understood at the vanishing point of the street alongside the Padcroft Works Development. Much of the proposed development would be concealed by the intervening built form in this view located on Station Road. At a reduced height of two storeys, the proposed development would be experienced as slightly smaller than the neighbouring Padcroft Works Development, though very much still in keeping with the existing townscape context. As with other views, the proposed development will assist in consolidating the contemporary character in the background of this view.

Magnitude of impact is: negligible.



Figure 34: View 04 Cumulative.

Cumulative

The blue wireline of the COMAG I scheme is mostly concealed in this view from the existing townscape – particularly the terrace properties on the left side of Station Road. A very small part of the COMAG I scheme may appear above this terrace slightly disrupting the roofline and perception of the chimneystacks in the distance. However, it is highly likely that the addition of the COMAG I scheme will not be noticeable and does not change the perception of the proposed development in the cumulative view.

Magnitude of cumulative impact remains: negligible.

5.5 Summary of Townscape Effects

Receptor	Name	Value	Sensitivity	Magnitude of Impact	Overall Effect
TCA 1	Study Site and Larger Plots	Medium	Medium	Low beneficial	Negligible
TCA 2	High Street and Station Road	Low-Medium	Low-Medium	Negligible	Negligible
TCA 3	Winnock, Wimpole, Padcroft and Bentinck Roads	Medium	Medium	Negligible	Negligible
TCA 4	Railway	Low	Low	Negligible	Negligible
TCA 5	Colham Mill Road	Low-medium	Low-medium	Negligible	Negligible

5.6 Summary of Visual Effects (Views)

View	Name	Value	Sensitivity	Magnitude of Impact	Cumulative Impact	Overall Effect
01	Tavistock Road Looking Northwest	Low	Low	Low Beneficial	Low Beneficial	Negligible effect
02	Tavistock Road Looking Northeast	Low	Low	Negligible	None	Negligible effect
03	Colham Mill Road looking North	Low	Low	Negligible	Negligible	Negligible effect
04	Junction Between Swan Road and Station Road	Low-medium	Low-medium	Negligible	Negligible	Negligible effect

6 Section 6: Impact on Heritage Assets

6.1 Impact on Heritage Assets

Heritage asset	Status	Heritage Value/Significance	Impact	Rationale
The De Burgh Arms Public House	Grade II	Medium	Neutral	<p>The scheme is unlikely to be visible from this building, including from its raised ground floor steps, especially with the reduced height of six storeys. As the proposed development would be a similar height to the existing modern development (Padcroft Works Development) in the foreground, it is likely to be concealed in views from this heritage asset.</p> <p>Views of the building – namely of its frontage - from the surrounding area would similarly be unaffected – due to the location of the proposed development, its scale and intervening development. Overall, the proposed development would have no adverse impact on the setting of this heritage asset.</p>
The Railway Arms Public House	Grade II	Medium	Neutral	<p>The scheme would be hardly perceptible from the heritage asset owing to the intervening railway bridge and infrastructure limiting visibility of the study site. The upper storeys of Padcroft Works Development are visible and this may be the case for the proposed development at six storeys owing to its relatively short distance from this heritage asset. This existing modern development contributes to the established character of the area and the setting of the asset. The proposed development would be experienced alongside the existing tall built form. Overall, the proposed development would have no adverse impact on the setting of the heritage asset.</p>
Offices of the Valentine Varnish and Lacquer Company	Grade II	Medium	Neutral	<p>View 03 is taken adjacent to these buildings. Whilst looking at the two main elevations of the building the scheme will not be visible. The proposed development will be partially visible in the setting of the eastern elevation on Humber Close. However, this is in the context of existing modern development which is already visible in the setting of this heritage asset. Intervening residential development and railway infrastructure largely conceals the proposed development. Overall, the proposed development would have no adverse impact on the setting of this heritage asset.</p>

1 Swan Road	Grade II	Medium	None	<p>Located relatively near to View 04, however, the designated asset is located off the main road. Therefore, owing to the location of the proposed development, scale and intervening development, the study site would not be visible from Swan Road. Therefore, the proposed development would have no impact on the setting of the heritage asset.</p>
West Drayton Station	Locally Listed	Low-Medium	None	<p>Owing to the lack of alignment of Station Approach and Tavistock Road, there is no intervisibility between the two roads. Therefore, the proposed development will not be visible from this non-designated heritage asset and would have no impact on its setting.</p>
Foundation stone for Colham Wharf outside Harrier House	Locally Listed	Low-Medium	None	<p>Located on Yiewsley High Street, there is no intervisibility or relationship between the study site and the non-designated heritage asset. Therefore, the proposed development would have no impact on the asset's significance.</p>
Key House (Former Town Hall)	Locally Listed	Low-Medium	None	<p>Key House is located on Yiewsley High Street, to the north of the study site. The scheme would not be visible from this locally listed building. Therefore, the proposed development would have no impact on the asset's significance.</p>
Church of St Matthew	Locally Listed	Low-Medium	None	<p>The former Methodist Church is located on Yiewsley High Street, to the north of the study site. The scheme would not be visible from the locally listed building. Therefore, the proposed development would have no impact on the asset's significance.</p>
The Old Post Office	Locally Listed	Low-Medium	None	<p>The scheme is visible from the setting of the non-designated heritage asset (as per View 04) as it is located south of the study site on Station Road. There is no direct visual relationship between the study site and the proposed development. Owing to the distance from the study site, its location, scale of the scheme in relation to existing built form and similar materiality to its surrounding context, views of the asset should not be affected. Overall, the proposed development would have no adverse impact on the setting of this heritage asset.</p>
Garden City, West Drayton	Area of Special	Low-Medium	None	<p>Due to the railway embankment and the intersecting townscape and foliage, the scheme would not be visible from West Drayton Garden City. View 3, located on Humber Close, is located</p>

	Local Character		just outside of this area and this is the only location in the vicinity where the scheme will be visible. Therefore, the proposed will have no impact on the setting of the heritage asset.
--	-----------------	--	---

7 Section 7: Impact on Townscape

The reduction of the proposed development to six storeys, plus one additional storey for the central feature, reduces the overall density of the building on the study site and its perception in the townscape. The height of the scheme continues to be rationalised with both the southeastern and western sections of the building consisting of six storeys. This rationalisation would still provide cohesion across the development. The reduced scale and height also continue to align to the height datums set by the neighbouring Padcroft Works Development, ensuring the proposal would sit comfortably within its context. The minor changes to the balconies and the centralising of the vertical core balances the overall composition. The increased extent of planting and private amenity at the ground floor improves the relationship between the proposed development and the street as well as its overriding residential character.

The proposals would still positively respond to the form, elevational treatment, rhythm, materiality, grain and proportions of the cumulative development on the street meaning the proposed development would continue to complement both the prevailing townscape and the cumulative context on Tavistock Road and the High Street.

The proposed roof terrace provides necessary amenity space for the development and the lift overrun is required for accessibility to this space. At a lower height, this would be less perceptible within the townscape and read in a context of the Padwork Croft Development adjacent and behind. The lift overrun has been designed as a feature to the front elevation of the building, with a white brick finish instead of render. Though the colour has not changed, the proposed use of brick responds and complements the predominant materiality in the surrounding context, enhancing the proposed development's contribution to the local character. The balconies are an improved design feature to the building, providing articulation to the front and side elevations, whilst also visually breaking up the front elevation and massing of the building.

In comparison to the permitted development (2024), though the proposed changes to the townscape area are minimal, it is considered to still respect and enhance the townscape character, complementing the existing townscape character, and have a **negligible** effect.

8 Section 8: Policy Summary and Conclusion

The study site does not contain any statutorily listed buildings or any non-designated heritage assets. It is not situated within any conservation areas nor any Areas of Special Local Character (also considered to be a non-designated heritage asset). It falls within Colne Valley Archaeological Priority Zone (APZ) – the assessment of potential impact on this APZ is out-of-scope for this assessment. The study site is a very constrained site (Site C), the smallest of the three sites within site allocation SA38 of the LB Hillingdon Local Plan Site Allocations.

This HTVIA has assessed all the nearby heritage assets within the study area (500m radius) of the site in accordance with the NPPF (2024) and Historic England Guidance. Based on the heritage and townscape sensitivities, this assessment has utilised a methodology based on the GLVIA3 and Historic England Guidance to assess impact on visual effects (views) and townscape effect (townscape character areas). The nearby heritage assets were taken into consideration in the selection of the verified views, and their setting makes up the baseline of one view. Two views were removed and the impact to the heritage asset assessed as part of Section 6.1 of the report.

The Summary of Townscape Effect (Section 5.5) found that the scheme would continue to have a **negligible effect** on TCA1 – TCA5 with a six storey scheme. This was due to the overall low townscape value of the existing townscape in most instances, combined with the limited visibility of the scheme. The magnitude of impact on TCA

1 would be **low beneficial** because the scheme complements the scale, landform and pattern of the townscape and consolidates the existing character of the TCA in which it sits.

The Summary of Visual Effect (Section 5.6) found that the scheme would have an overall **negligible effect** on all four views though the magnitude of impact for V01 is considered to be **low beneficial**. This low beneficial magnitude of impact, owing to the low townscape quality of the view, is considered to have a negligible effect to View 01. As noted in the baseline assessment, Tavistock Road is less frequented by pedestrians. The scheme would improve the design in comparison to the existing condition, its impact on the townscape would be beneficial along Tavistock Road, and negligible to local views. The scale, height, and design of the building, at six storeys, would still respond well to its surrounding urban and emerging context.

The Summary of Impact on Heritage Assets (Section 6.1) found that the scheme would have **neutral impact** on three of the listed buildings in the vicinity of the proposed development. The other heritage assets identified (designated and non-designated), due to the lack of visibility of the scheme from the assets and the very minimal change caused to the setting, the proposed development is considered to have no impact on the setting of the heritage assets. In accordance with Section 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the proposed development would preserve the setting, and thus significance, of surrounding listed buildings. Moreover, the proposal meets the criteria of the NPPF (2024). The surrounding heritage assets, both designated and non-designated, have been identified, their significance understood and the impact of the proposals on the assets assessed in section 2 and 6 respectively. Paragraph 215 was not engaged by the proposed development. The proposals also accord and align to the requirements of the London Plan (2021).

According to the Inspector's Assessment of the 2021 permitted application, 'the proposal would accord with allocation **Policy SA38' (DMP)** and would deliver a scheme that is well designed and responds positively to the site and its surroundings. The scheme would complement Padcroft Works and would align with the scale of both this and... Comag. Therefore, the proposal would accord with the allocation's inherent expectation for development on site to complement adjacent plots and the site's urban context.' The proposed amendments to this scheme are considered minor (in comparison both to the 2021 permitted application, as well as the 2024 permission) and therefore, this assessment remains valid. The proposal would extend and continue the existing grain of development and contribute to the comprehensive redevelopment of this allocated site. The proposed development would also comply with relevant policies in Hillingdon's London Plan (Part 1) (2012) and the London Plan (2021).

As such, the scheme is considered to respect and enhance the townscape character and historic environment, responding to local context, scale, and character.

9 Appendix I: Background and Evolution

9.1 Evolution of the Townscape

West Drayton has existed as a settlement since Saxon times and was mentioned in the Domesday Book in 1086. West Drayton was a manorial centre and parish from the Middle Ages. The Manor of West Drayton, which existed approximately 1 kilometre south of the study site was owned by the Paget family in the 16th century (and William Paget was Secretary to Jane Seymour), and the Gate House and Church which were part of the 19th century manor survive today (Figure). In the 18th century the previous manor was demolished, and the manorial land passed to the De Burgh family who occupied Drayton Hall (still standing, now Council Offices) which remained in the hands of the De Burghs until 1939.

Yiewsley had a somewhat separate history in the Middle Ages. It was not mentioned in the Domesday book, although the place name is also thought to have Saxon origins and fell within the Colham Manor and was in a separate parish. When the De Burgh family came to the area in the 18th century, they also became owners of Colham Manor.



Figure 35: 16th Century Gate House (Grade II*), formerly part of the Manor of West Drayton under the ownership of the Paget family, located at the top of Church Street, West Drayton.

The village of West Drayton remained broadly similar to its 16th century layout up to the 19th century remaining a fairly sparsely populated agricultural parish, centred around The Green. The arrival of infrastructure altered this,

¹ 'West Drayton: Introduction', in *A History of the County of Middlesex: Volume 3, Shepperton, Staines, Stanwell, Sunbury, Teddington, Heston and Isleworth, Twickenham, Cowley, Cranford, West Drayton, Greenford, Hanwell, Harefield and Harlington*, ed. Susan Reynolds (London, 1962), pp. 187-191. *British History Online* <http://www.british-history.ac.uk/vch/middx/vol3/pp187-191> [accessed 9 November 2021].

with the Grand Union Canal constructed at the north of the West Drayton Parish in 1789. Increased traffic along the road to Bath also brought further opportunity for industry and trade. Thus, the nature of the parish's main activities changed, and the canal acted as a new focal point in the north of the parish with a wharf with several warehouses standing on the south bank of the canal (the West Drayton side).¹

Yiewsley also became properly established in its own right during the industrial period, with brickyards and goods warehouses along the canal. In 1949 the Parish of West Drayton was absorbed into Yiewsley Parish, linking the two settlements and instigating the somewhat agglomerated identity that the two places have today.

The canal history of Yiewsley and West Drayton during 19th and early 20th centuries, is older than much of the built environment in LB Hillingdon, which remained as rural land until the early-mid 20th century. Yet Yiewsley and West Drayton also underwent significant modernisation along with the rest of LB Hillingdon, during the expansion of London in the post-war period. This saw housing developments constructed around the borough and small-scale industry gave way to employment in different industries such as nearby Heathrow Airport (then 'London Airport'). There is some evidence of the village-esque, and small-scale industrial townscape remains in the locally listed and listed buildings which are dotted around the area.

Many of the more historic buildings were lost in this wave of development, and subsequent phases of development in the later 20th century (Figure).



Figure 36: Bridge over the canal ('Colham Bridge') in 1920s, showing Colham Wharf building on the left where current Drayton Wharf (constructed 2016) stands (source: R Whitley & Co).

9.2 Map Regression

This section presents a series of maps which track the evolution of the area around the study site over time. Maps are presented from the following years (the approximate area that the study site now stands is marked in red):

- 1754 Map, John Rocque Map
- 1868 Ordnance Survey Map
- 1912 Ordnance Survey Map
- 1934 Ordnance Survey Map
- 1938-1943 Ordnance Survey Map



Figure 37: 1754 John Rocque Map (approximate site location marked in red).

In the 1754 Map, West Drayton is clearly marked as a settlement, and the river network including Fray's River is also clearly visible, but the canal has not yet been constructed at this date. Also marked is Coltham Mill, which survives today and is Grade II listed. The study site and much of the area around it is open fields although there is some development along the main route (what is now Yiewsley High Street).



Figure 38: 1868 Ordnance Survey Map (site location marked in red).

The 1868 map shows that great changes have occurred in West Drayton / Yiewsley, by this point both the canal and railway can be seen. These two pieces of infrastructure and the roads that have started to form provide the recognisable urban island that encompasses Tavistock Road and the surrounding streets, and that is still recognisable today. West Drayton Station is marked as standing opposite the location of the study site, much further west than its current location. The site itself is as yet undeveloped, although some buildings have been constructed within the island site: 'Colne Villas' and 'Tavistock Villas' – both terraces of residential houses. Coltham Mill is still marked to the south of the railway. The forms of the two other listed buildings in the vicinity: the De Burgh Arms and the Railway Arms public houses to the north and south of the railway, are both visible here. The area further south of the railway in West Drayton still appears to be in use as farmland.



Figure 39: 1912-1913 Ordnance Survey Map (site location marked in red).

In the 1912-13 map we can see the study site has been developed for the first time, with a printing works marked on the site. The streets to the west of the study site such as Wimpole Road, Padcroft Road and Winnock Road are now marked. Beyond these streets is some open land and Padcroft Boy's House is marked. Immediately to the north of the site, between the printing works and the canal appear to be some buildings of larger footprint, likely light-industrial units. West Drayton Station has now moved to its current location and development in wider area has increased also, with residential properties south of the railway as well as some industrial activity.



Figure 40: 1934 Ordnance Survey Map (site location marked in red).

There have been no substantial changes to the study site and immediate environs. Further afield, to the south of the railway residential development has increased with larger-plot, semi-detached residential houses visible. Colham Flour Mill has now become a film works.



Figure 41: 1938 – 1943 Ordnance Survey Map (site location marked in red).

The 1938 – 1943 map shows that there have been some more, smaller buildings constructed on the study site. The main buildings have retained their footprint, so it is presumed that these structures are small light weight structures or outbuildings. There have been no substantial changes to the site's environs.

10 Appendix II: Methodology

10.1 Introduction

This section explains the methodologies employed for both assessment of the baseline conditions and the effects of the scheme on heritage, townscape and visual receptors. This assessment has been carried out using desk-based data gathering and fieldwork.

10.2 General Methodology

This assessment has been carried out using a combination of desk-based data gathering and on-site investigations. The methods used in order to undertake the study were the following:

10.2.1 Literature and Documentary Research Review

The documentary research was based upon primary and secondary sources of local history and architecture, including maps, drawings and reports. The documentary research was based upon primary and secondary sources, including maps, drawings and reports. Dates of elements and construction periods have been identified using documentary sources and visual evidence based upon experience gained from similar building types and construction sites.

10.2.2 Site Investigations

A site investigation has been carried out on 1st October 2021, 14th May 2024 and 4th March 2026 by visual inspection to analyse the site and its built environment context. We have used photography to demonstrate our findings.

10.3 Built Heritage Methodology

10.3.1 Baseline Assessment

The baseline conditions have been established through an initial desktop survey to identify the relevant heritage assets in proximity to the study site. This included a search of Historic England's National Heritage List for England to identify statutory listed buildings (registered parks and gardens and scheduled monuments are not relevant in this case), and a review of LB Hillingdon's website to identify conservation areas and locally listed buildings. For the purposes of this TVIA, built heritage receptors do not include archaeological remains.

Desktop surveys were supplemented by a site visit undertaken on 1st October 2021 and 14th May 2024 to enable a robust assessment of the heritage significance of the identified heritage assets, including any contribution of their settings. Site visits enabled a better understanding of the current relationship between the study site and the surrounding heritage assets and the potential effects of the scheme on their settings and significance (value).

10.3.2 Assessing Heritage Significance

Paragraph 200 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."*

'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."*

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

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."

Criteria have been established to appraise a heritage asset's significance. Statutory criteria, as set out in the 'Principles of Selection for Listing Buildings', DCMS, 2010, provides a list of principles of assessing significance based on architectural and historic interest, age and rarity, aesthetic merits, selectivity and national interest. Historic England's criteria outlined in 'Conservation Principles, Policies and Guidance,' and also considered in this assessment is the latest Historic England guidance "Statements of Heritage Significance: Analysing Significance in Heritage Assets" (October 2019).

Historic England guidance document *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (2017) identifies a 5-step approach to assessing the implications of development proposals which may affect the setting of heritage assets.

The significance of built heritage assets (receptors) is assessed against the criteria contained in **Table 1**.

Heritage Significance	Description
High	Grade I and Grade II* listed buildings. Other buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the listing grade. Conservation Areas containing very important buildings.
Medium	Grade II listed buildings. Historic buildings that can be shown to have exceptional qualities in their fabric or historical associations. Conservation areas containing buildings that contribute significantly to its historic character.
Low	Locally listed buildings. Historic buildings of modest quality in their fabric or historical association.

Table 1: Value of built heritage receptors

Once the heritage significance of the built heritage asset (receptor) has been assessed, including any contribution of its setting, the likely potential impact of the scheme upon its heritage significance is then assessed. Potential impacts are defined as a change resulting from the scheme that affects the heritage asset including its setting.

10.3.3 Assessing Impact

The impact of the proposals on heritage assets has been based on the understanding of their significance and setting, the nature of the proposals themselves. The following grading system has been used for physical/visual impact assessments in this assessment:

- **Substantial adverse / harm / impact:** a fundamental change in the appreciation of the resource and its historic context, or setting, involving the degradation of a cultural heritage site of national importance, or the substantial demolition of any grade of a statutorily listed building. This is usually considered as 'substantial harm'.
- **Moderate adverse / harm / impact:** a change that makes an appreciable difference to the ability to understand the historic context, or setting, resulting in an extensive long-term change to the setting or fabric of listed buildings. It may moderate fabric loss, or clear encroachment upon a conservation area/historic parkland/setting, where intrusive views are created or impacts upon its integrity would result.

- **Minor adverse / harm / impact:** effects which create small dis-benefits to the historic fabric of the listed asset. This may also provide other benefits or mitigation, or be necessary for safety, statutory regulations or other essential purposes. It may involve small areas of fabric loss, or limited encroachment upon a conservation area/historic parkland/setting, where slightly intrusive views are created or slight impacts upon its integrity would result. This is usually considered as ‘less than substantial harm’.
- **Neutral:** the development would not materially affect the status quo.
- **Minor beneficial:** small yet perceptible improvement in the setting of, or condition of, or character of the listed building/conservation area or its setting. It may involve the removal of minor adverse features, or to limited areas of appropriate reinstatement.
- **Moderate beneficial:** a change that appreciably helps to explain the significance and history of the site and surrounding area, ensuring the long-term future and understanding of Listed Buildings. This may include the reinstatement of lost historic features or formats and the removal of inappropriate and intrusive later features.
- **Substantial beneficial:** effects which ensure the long-term future of the most significant historic fabric by providing viable and appropriate uses and, impacts which substantially improve the setting of a Listed Building/historic parkland/Conservation Area, and which repair and conserve the most significant fabric of the Listed Building.

10.4 Visual Impact Assessment Methodology

The methodology for assessing townscape and visual effects is broadly based on the principles set out in the third (2013) edition of *Guidelines for Landscape and Visual Impact Assessment* (GLVIA3), produced jointly by the Landscape Institute and the Institute of Environmental Management and Assessment. It is noted, however, that these principles are better suited to assessing natural landscapes than urban townscapes, and so they form only a general guide to the method used for assessing an urban townscape such as the study site and its surroundings. Given the study site’s historic surroundings, the following guidance is also of relevance to this assessment:

- *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 2nd edition* (Historic England, 2017)
- *Seeing the History in the View* (Historic England, 2011) – superseded by the above guidance but still remains a useful tool.
- *Conservation Principles, Policies and Guidance* (English Heritage, 2008).

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.

Whilst the assessment has been informed by a series of criteria which is set out in the Tables that follow below, it is important to note that these criteria are intended as a guide to inform professional judgement.

10.4.1 Townscape Character Assessment

Article 2 of the European Landscape Convention defines landscape to include urban areas. The GLVIA3 states that assessment work needs to respond to the particular context in which it takes place. It expresses townscape as being “*areas where the built environment is dominant... townscape means the landscape within 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.*” (Para. 2.7).

An assessment has been made of the study site and its surroundings in their existing state. This analyses the physical features and characteristics of the townscape and considers the current status of the study site. The objective of identifying the existing context is to provide an understanding of the townscape in the area that may be affected by the scheme – it’s constituent elements, overall character, condition, how it is experienced, the value attached to it and its susceptibility to change. This process is referred to as townscape character assessment.

Townscape character is assessed through the identification of a number of geographical areas which have readily identifiable characteristics in common. The physical characteristics of townscape may include: topography; patterns of land use and open space; development patterns and scale, including architectural styles and periods, density, massing, building types and materials; heritage assets including listed buildings, conservation areas and registered parks and gardens; vegetation patterns, including types of green space and their relationship to build form; permeability and linkages; public realm; and transport routes, including roads, railways, footpaths and waterways.

Consideration of these townscape elements were used to identify Townscape Character Areas (TCAs), defined as areas with broadly homogenous characteristics. The TCAs are based upon a combination of desk-based research, studying historic maps, OS maps and aerial images. Existing character assessments have also been reviewed and have informed this assessment where applicable.

This desktop analysis was supplemented by site visits undertaken by Heritage Architecture Ltd in October 2021 to finalise an assessment of the existing townscape character. This was reviewed in May 2024. The study area for the baseline townscape character assessment was determined by the immediate visual envelope of the study site and where the scheme was considered to potentially influence local townscape character and local views.

The Townscape Character Areas have been mapped with boundaries and their key characteristics described within the baseline assessment (Section 3 of this report). Whilst defined boundaries are shown for the purpose of mapping the TCAs, in reality the transition between character areas is often more gradual.

The GLVIA3 uses the term ‘receptor’ to mean both elements of the physical townscape, and people who will see the development. ‘Viewers’ are taken to be the general public affected by development, considering the differing interests and expectations likely to be found in residents, visitors or people who work in a place. The assessment recognises that people are generally more sensitive to change in the area where they live than elsewhere; and that they are generally more sensitive to change which affects recreational environments such as parks and open spaces rather than streets, whether designated or non-designated.

The TCA assessment includes identifying the **value** of each area. The consideration of value is initially based on, and takes into account, whether it is covered by a townscape designation at a national, regional or local level. This is also informed by designated heritage assets. An assessment of the value of each townscape character area is informed by the criteria set out in **Table 2:**

Value	Description
High	Strong townscape structure with distinctive features and buildings worthy of conservation. Visually coherent groups of well-designed/well-proportioned buildings with a strong sense of place. Buildings relate well to streets, spaces and landscape elements. Few detracting elements. The townscape might include heritage designations of national importance (e.g., scheduled monuments, registered park and garden, listed buildings and conservation areas containing very important buildings).
Medium	The townscape has a recognisable structure with some features and buildings worthy of conservation. Relatively coherent grouping of buildings and a recognisable sense of place but occasional elements may lack quality and cohesion. Buildings are reasonably well-related to the public realm. May include locally valued townscape, conservation areas that contribute significantly to its historic character, some listed buildings or locally listed buildings.

Low	Distinguishable townscape structure with some positive features and buildings worthy of conservation at a local level. Lacking a sense of place and identity with detracting features. Possibly including some areas that are identified for improvement.
------------	---

Table 2: Value of townscape character

The TCA assessment also considers each area’s susceptibility to change which is assessed as being high, medium or low. The less likely that the townscape receptor can accommodate the scheme without undue consequences to the baseline condition, the higher its susceptibility to change.

The value and susceptibility to change is then combined to judge the **sensitivity** of each TCA. The assessment of sensitivity takes into account the heritage assets and their settings, including listed buildings, conservation areas, world heritage sites, scheduled ancient monuments, registered parks and gardens, non-designated heritage assets, locally listed buildings and townscape landmarks.

The assessment of the sensitivity of the receptor under consideration may be moderated to take into account a judgement about its quality, relative importance and significance. For example: a World Heritage Site or a listed building may have a good or a poor setting, and a good quality setting is more sensitive to change than a poor-quality setting. Similarly, a listed building or a part of a conservation area may be a prominent aspect of a view, or it may be present in the view but only incidentally. Conservation areas include within them areas of greater and lesser quality; and so on. Thus, there is not necessarily a direct link between the different categories of heritage assets and their relative importance, and the assessment of sensitivity as high, medium or low.

Table 3 outlines the general criteria to inform judgements on townscape sensitivity:

Sensitivity	Description
High	Townscape with distinctive components and characteristics, often including designated townscapes and/or important designated heritage assets; susceptible to small changes of the type of development proposed.
Medium	Townscape with local value, of relatively common components and characteristics and may include heritage assets such as conservation areas and locally listed buildings; reasonably tolerant of changes of the type of development proposed.
Low	Townscape of limited value and relatively inconsequential components and characteristics, including few or no designated and/or non-designated heritage assets; the nature of which is potentially tolerant of substantial change of the type proposed.

Table 3: Sensitivity of townscape character

Impact of the scheme upon the townscape character may be described as **beneficial, neutral** or **adverse**. This impact is assessed as part of the visual impact assessment, as per table 5.5.

10.4.2 Viewpoints

The visual impact assessment considers how views will change as a result of the scheme and how this will affect people and visual amenity at different places. Visual receptors relate to people but are defined according to use e.g., residential, business, road, footpath etc, rather than townscape features.

The GLVIA3 defines the following visual receptors as being likely to be the most susceptible to change residents; people engaged in outdoor recreation including users of public rights of way or whose attention is likely to be focused on particular views; and visitors to heritage assets or key attractions, particularly where views of the surroundings are important to the experience. The assessment is limited to publicly accessible viewpoints and does not comprise a residential amenity assessment (which considers private viewpoints from residential properties), as this is separate from a TVIA (refer to GLVIA3, paragraph 6.17).

The visual baseline establishes the area in which the scheme is likely to be visible and the groups of people who may experience views of the scheme. The study area is centred on the study Site and is limited to locations from which the study site can be seen, or from which new buildings on it are likely to be visible at the height proposed.

A study was undertaken to establish a set of potential viewpoint locations to inform the TVIA and from which ‘as existing’ and ‘as proposed’ Accurate Visual Representations (AVRs) are provided.

Potential viewpoint locations were initially identified based on an examination of maps and aerial photographs; the documents referred to above; maps of conservation areas; and maps and lists of listed buildings. Importantly, the previous permitted scheme has provided a baseline for the viewpoints to be examined (Ref: 35810/APP/2021/1234). The study area and the possible locations were then visited and reviewed to establish a set of **four viewpoints** (Section 5). Views 1 and 4 were tested as part of the previously permitted scheme, they have been omitted from this assessment given that the proposals were very limited / had no intervisibility due to intervening development. The potential impact on the relevant heritage assets is dealt with in Section 6.

It is acknowledged that the proposals may be visible from some locations beyond those that have been selected, however, it is considered that the selected representative viewpoints cover an appropriately broad area of visibility and will provide the most significant views as well as an idea of the likely potential impact of the scheme beyond these locations.

A total of **four Accurate Visual Representations (AVRs)** provide the basis for the assessment of the scheme and its effect on the identified views. The AVRs have also informed an assessment of the likely effects on townscape and heritage receptors. Each viewpoint is reproduced in the subsequent sections of this report this report and includes the view ‘as existing’, ‘as permitted’ and ‘as proposed’. Additionally, the previously permitted COMAG I scheme on the neighbouring site (Site allocation SA38 Site B) has also been represented as a verified ‘cumulative’ view.² The methodology for the compilation of AVRs prepared by Rock Hunter is provided in Appendix 4.

10.4.3 Visual Impact Assessment

The baseline visual assessment considers the **value** of each view. This is informed by the criteria in **Table 4**:

Value	Description
High	<p>Statutory development plan identified views and/or views of national or regional importance, or particular local importance.</p> <p>The view is likely to be a nationally or regionally important view (e.g., views in the LVMF, a view identified in a World Heritage Site management plan or designed views within grade I or II* historic parks or gardens)</p> <p>and/or contain heritage assets such as World Heritage Sites, grade I or II* listed buildings, scheduled monuments, grade I or II* historic parks or gardens or historic battlefields whose heritage significance is well represented in the view, and which benefit from being seen in combination with each other.</p> <p>The view is associated with a designated heritage asset of a high grade whose settings has not been compromised, or across high quality/valued townscape.</p> <p>The view might be referred to in several guidebooks or on tourist maps and/or referenced in art/literature.</p>
Medium	<p>Supplementary planning documents identified views including conservation area appraisals, and/or views of regional or local importance.</p> <p>The view is likely to be of importance at the county, borough or district level (e.g. Metropolitan Views defined by London boroughs or designed views within grade II historic parks or gardens)</p>

² A new application has been made, however this has not been permitted as of the time of this study - May 2024

	<p>and/or contain heritage assets such as grade II listed buildings, grade II historic parks or gardens, conservation areas, locally listed buildings or other locally identified heritage resources whose heritage significance is well represented in the view and which benefit from being seen in combination with each other.</p> <p>It may also be a view that contains heritage assets such as World Heritage Sites, grade I or II* listed buildings, scheduled monuments, grade I or II* historic parks or gardens, or historic battlefields whose heritage significance is clearly readable, but not best represented, in this particular view.</p> <p>Views of relatively common elements of townscape, likely to be of local visual amenity importance. It may comprise public rights of way through townscapes of moderate value or settings of heritage assets that have already been compromised.</p>
Low	<p>The view is not associated with designated heritage assets or important townscape. It might be across ordinary or poor-quality townscape with detracting or common elements. The view is unlikely to be referred to in guidebooks or on tourist maps and/or referenced in art and literature. It is likely to be of little visual amenity importance.</p> <p>The view may be a locally valued view and contain heritage assets whose heritage significance is clearly readable, but not best represented, in this particular view.</p>

Table 4: Value of a view

The **susceptibility to change** within a view has been judged on a case-by-case basis, taking account of the occupation or activity of the people experiencing the view and the extent to which their attention or interest is focused on the view; this is assessed as being high, medium or low. The higher the importance of the visual receptor and the more open the view of the scheme is, the higher its susceptibility to change.

Visual receptors have been assigned a category of sensitivity based on a combination of the value of the view and their susceptibility to the type of change proposed. **Table 5** outlines the general criteria on which professional judgements on the sensitivity of visual receptors has been informed.

Sensitivity	Description
High	<p>Specific interest or appreciation of the view, including residents, people engaged in outdoor recreation or using public rights of way, whose attention is focused on the townscape/view; and/or a view of national value (e.g., designated/protected views or important views within conservation areas).</p> <p>A low ability to accommodate the specific proposed change.</p>
Medium	<p>General interest or appreciation of the view, including people engaged in outdoor recreation that does not focus on an appreciation of the townscape; and/or a view of local or limited value of (e.g., suburban residential areas or areas outside of conservation areas).</p> <p>A medium ability to accommodate the specific proposed change.</p>
Low	<p>Interest, appreciation or period of exposure to the view is limited, including people at work or motorists travelling through the area; and/or a view of limited value (e.g., industrial areas or derelict land).</p> <p>A high ability to accommodate the specific proposed change.</p>

Table 5: Sensitivity of view/visual receptors

The **magnitude of impact** results from a combination of the degree of change, the extent over which the changes will be visible and the period of exposure to the view. **Table 6** outlines the criteria against which an assessment of

the magnitude of impact in each view has been informed. This incorporates magnitude of impact on the view itself, any heritage assets within the view, and on the townscape character. Impact has been determined through a consideration of the size, scale and intensity of the proposed change, the geographical extent of the area influenced, the type of development and the level of integration of new features with existing elements.

Impacts may be beneficial or adverse. If the proposed changes will enhance heritage values or the ability to appreciate them, or enhance townscape character and views within an area, as expressed in the baseline assessment, then the impact on heritage significance and townscape character within the view will be deemed to be beneficial; however, if they fail to sustain heritage values or impair their appreciation, or if they detract from townscape character, then the impact will be deemed to be adverse.

Magnitude of Impact	Description
High beneficial	<p>The development considerably enhances the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.</p> <p>The scheme responds very well to the scale, landform and existing pattern of the townscape and will result in considerable enhancements.</p> <p>The Development would create a significant improvement in views.</p>
Medium beneficial	<p>The development enhances to a clearly discernible extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.</p> <p>The scheme is characteristic of the scale, landform and existing pattern of the townscape, and maintains and/or enhances the existing quality or characteristic features.</p> <p>The scheme would create a noticeable and improved change to the existing view.</p>
Low beneficial	<p>The development enhances to a minor extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.</p> <p>The scheme complements the scale, landform and pattern of the townscape and maintains the existing character.</p> <p>The scheme results in minor improvements to the existing view.</p>
Negligible/None	<p>The development does not affect the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.</p> <p>The scheme results in limited or barely perceptible changes to the existing townscape character.</p> <p>The scheme results in limited or barely perceptible changes to the existing view.</p>
Low adverse	<p>The development erodes to a minor extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.</p> <p>The scheme does not complement the scale, landform and pattern of the townscape and/or detracts from its existing quality or characteristic features.</p> <p>The scheme causes minor deterioration or visual intrusion to the existing view.</p>
Medium adverse	<p>The development erodes to a clearly discernible extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.</p> <p>The scheme is not characteristic of the scale, landform and pattern of the townscape, and/or damages its existing quality or characteristic features. It includes elements that are prominent but may not be substantially uncharacteristic of the existing townscape.</p>

	The scheme causes noticeable deterioration or visual intrusion to the existing view.
High adverse	The development severely erodes the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values. Where the scheme is at considerable variance with the scale, landform and pattern of the townscape and/or is considerably detrimental to quality or characteristic features. It includes the introduction of elements that are prominent and uncharacteristic of the townscape. Where the scheme causes major deterioration or visual intrusion to the existing view.

Table 6: Magnitude of Impact

To determine the overall effect the magnitude of impact is assessed against the sensitivity score using the Table 7.

	With High Value	With Medium Value	With Low Value
With high magnitude of impact	Major effect	Major effect	Moderate effect
With medium magnitude of impact	Major effect	Moderate effect	Minor effect
With low magnitude of impact	Moderate effect	Minor effect	Negligible effect
Negligible / neutral impact	Negligible effect	Negligible effect	Negligible effect

Table 7: Overall Effect

Limitations and assumption: In considering the effects of the scheme upon built heritage assets, townscape character and representative viewpoints, the assessment is based on the material that accompanies the planning application, including the Accurate Visual Representations (AVRs) by Rock Hunter and the Design and Access Statement and scheme drawings prepared by Create Design and Architecture.

The visual analysis is based on views from external spaces within the public domain and not from inside buildings or private spaces. The GLVIA3 outlines that public views are generally attributed greater value than views from private property due to the number of visual receptors being greater.

The assessment was carried out through a combination of desk-based study and site visits; however, this experience can only be demonstrated in the TVIA through the use of photographs, AVRs, plans and maps. The six verified views that are included within the TVIA do not cover every possible view of the scheme but are a selection of representative viewpoints from publicly accessible places or from points where there are particular townscape or heritage sensitivities.

The AVRs are two-dimensional and cannot fully capture the complexity of the real visual experience. They form an indication of the true three-dimensional visual experience. Neither do the AVRs capture transient significant effects arising from noise or traffic. The text accompanying each view seeks to contextualise. A visit to the location from which the photographs were taken is strongly encouraged to better appreciate and understand the visual impact.

The AVRs do not give an appreciation of kinetic views. None of the views of the scheme are likely to be views where viewers will be stationary to appreciate the view but are likely to be views where the viewer is in motion. Again, a visit to the location from which the AVRs were taken as part of a kinetic experience (for example walking towards, through and past the viewpoint) is strongly encouraged to better appreciate and understand the visual impact.

11 Appendix III: References

'Colne Valley Park: a brief history' via <https://www.colnevalleypark.org.uk/wp-content/uploads/2019/03/Brief-history-of-CVP.pdf> [accessed 8th November 2021]

'West Drayton: Introduction', in *A History of the County of Middlesex: Volume 3, Shepperton, Staines, Stanwell, Sunbury, Teddington, Heston and Isleworth, Twickenham, Cowley, Cranford, West Drayton, Greenford, Hanwell, Harefield and Harlington*, ed. Susan Reynolds (London, 1962), pp. 187-191. *British History Online* <http://www.british-history.ac.uk/vch/middx/vol3/pp187-191> [accessed 9 November 2021].

12 Appendix IV: Relevant Policy and Guidance

Relevant National Policy and Legislation

The Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act') is legislative basis for decision making on applications that relate to the historic environment. **Sections 16 and 66** of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that: [...] in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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.

Similarly, **Section 66** of the above Act states that: In considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be the Secretary of State shall 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) (2024)

This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

208. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account

when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 212 the framework states the following: ...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.

213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

(a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

(b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

215. 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.

216. 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 judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

National Planning Policy Guidance (PPG) (2024)

The National Planning Practice Guidance (NPPG) was last updated in February 2024 to support the National Planning Policy Framework (NPPF) and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

Our assessment methodology (Appendix II) uses the NPPF and NPPG's terminology for significance.

Paragraph 7: *Why is 'significance' important in decision-taking? Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.*

Paragraph 8: *How can proposals avoid or minimise harm to the significance of a heritage asset?*

Understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm. Analysis of

relevant information can generate a clear understanding of the affected asset, the heritage interests represented in it, and their relative importance.

Paragraph 13: *What is the setting of a heritage asset and how should it be taken into account? The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent. The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time. When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.*

Paragraph 15: *What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions? The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure. In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.*

London Plan (2021)

The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital.

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

London Design Guidance

The Mayor of London has been undertaking work on design related guidance during the undertaking of this study. This includes the following directly related to plan-making:

- Characterisation and Growth Strategy LPG.
- Optimising Site Capacity: A Design-led Approach LPG.
- Small Site Design Codes LPG.

Relevant Regional and Local Policy and Guidance

- Hillingdon Council's:
 - The Local Plan Part 1: Strategic Policies* (November 2012)
 - The Local Plan Part 2: Development Management Policies* (January 2020)
 - The Local Plan Part 2: Site Allocations* (January 2020)

Strategic Objectives

Policy SO1: Conserve and enhance the borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

Policy SO2: Create neighbourhoods that are of a high quality sustainable design, that have regard for their historic context and use sustainability principles which are sensitive and responsive to the significance of the historic environment, are distinctive, safe, functional and accessible and which reinforce the identity and suburban qualities of the borough's streets and public places, introduce public art to celebrate civic pride and serve the long-term needs of all residents.

Policy HE1: Heritage

The Council will:

1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes: Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features; Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments; Registered Parks and Gardens and historic landscapes, both natural and designed; Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and Archaeologically significant areas, including Archaeological Priority Zones and Areas.

2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.

3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.

4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.

Policy BE1: Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;

2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;

3. Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;

4. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);

5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;

6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;

7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;

8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;

9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;

10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;

11. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.

Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies.

DMP Policy SA38

The site forms part of the Local Plan site allocation Policy SA38, which is allocated for residential use. The site allocation is divided into three parts. Site A is the former Padcroft Works, which has been developed. Site B is the adjacent Comag site and **Site C is the former Tavistock Works site** (the study site).

