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## **LB Hounslow Local Plan Examination**

### **Matter 8: Design, Tall buildings and Heritage**

#### **Written Statement by Royal Botanic Gardens, Kew**

**December 2025**

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## 1. Introduction

- 1.1 Royal Botanic Gardens, Kew (RBGK) is a world-famous scientific organisation, internationally respected for its outstanding collections as well as its scientific expertise in plant and fungal diversity, conservation and sustainable development in the UK and around the world. In addition to its scientific and research function, Kew Gardens is a major international and a top London visitor attraction.
- 1.2 Its site at Kew Gardens is on the south bank of the River Thames in the north of the London Borough of Richmond (LBRuT), partially aligning the boundary of LB Hounslow. Kew Gardens is a UNESCO World Heritage Site (WHS) and of exceptional heritage significance.
- 1.3 Kew Gardens is within a Conservation Area, is a Grade I listed Registered Park and Garden and is home to 56 listed buildings and structures. There are multiple protected views from and within Kew Gardens, including the Great Lawn, Broad Walk, Orangery, Temperate House and Syon Vista. The position of Kew Gardens, immediately south and east of LBH's borough boundary, and its status as a WHS, has the potential to be significantly impacted by development taking place in Hounslow.
- 1.4 RBGK has engaged with the production of the new Local Plan for LB Hounslow (LBH) at each stage of its development, and during the previous Examination period (relating to the previous version of the draft Local Plan which comprised several different volumes) agreed Statements of Common Ground (SoCG) with LBH and LBRuT as well as Historic England (HE). RBGK expects to agree a revised SoCG with LBH and LBRuT prior to the EIP Hearings in January 2026 and that this will be made available to the Examination/Inspector.
- 1.5 The National Planning Policy Framework (NPPF) outlines that during the examination process a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to two of the Inspector's questions relating to Matter 8, which set out why RBGK considers changes to LBH's Local Plan are necessary to ensure its soundness.
- 1.6 References to the Plan are to the policies and supporting text as set out in the Submission version of the Plan, unless otherwise stated.
- 1.7 This Statement relates to Matter 8: Design, tall buildings and heritage.

## 2. Response to Question 1

- 2.1 In its representations on successive iterations of the Plan, RBGK has emphasised the importance of wording used in policies CC3 and CC4 in relation to harm to heritage assets, including the OUV of the WHS. This wording has evolved as the Plan has developed and in the Submission Version references to 'adverse impact' have been replaced with considerations of 'harm to significance' and references to 'protecting' and 'respecting' replaced with 'conserve'.
- 2.2 RBGK welcomes these amendments and anticipates that the Examination will carefully consider whether the wording of policies in the Plan that are designed to provide protection to heritage assets *properly* and *consistently* reflects the current guidance in the NPPF (in particular para. 219) and the London Plan, and is in line with the advice of HE and UNESCO. This is critical to ensure the Plan is consistent with national policy and can therefore be considered 'sound'.

## 3. Response to Question 2

### Map CC3.1

- 3.1 RBGK has expressed strong concerns about the identification of a large proportion of the LBH, including the area up to the banks of the River Thames north of Kew Gardens and other areas that incorporate the WHS buffer zone, as suitable for tall buildings over 21m in height in Map CC 3.1 (referenced in part K of Policy CC3). Such near-blanket acceptance of tall buildings in LBH would have the potential to encourage a significant number of new proposals for tall buildings which will harm the OUV of Kew Gardens WHS.
- 3.2 RBGK maintains that the identification of such a broad area as acceptable for tall buildings contradicts several documents that form the evidence base for the draft Local Plan, including The Tall Buildings Study (2024) (TBS) which identifies the RBGK WHS buffer zone as one of the sensitive places 'where tall buildings will not be an appropriate form of development' (para 6.1.2).
- 3.3 The reference in CC3, part K to Map CC 3.1 appears to have been removed in amendments proposed to the Submission Version of the Plan. However, RBGK is unclear as to whether this map will appear elsewhere in the Plan and, if so, how it is intended to be used to inform the interpretation of policies within the Plan. If Map CC 3.1 is to remain in

the final Plan document, RBGK asserts that the Plan cannot be considered sound because this approach to permitting tall buildings across the borough, including in areas highly likely to impact the WHS, is not appropriately justified. RBGK considers that removal of any references to map CC 3.1 is required to correct this and make this aspect of the Plan 'sound'.

**Table CC 3.2**

3.4 Policy CC3 (part L) refers to Table CC 3.2, which sets out 'maximum permissible heights' for specific areas within LBH, including the Great West Corridor area. This includes for tall buildings up to 45m (55.5m AOD) and focal buildings up to 68m (80m AOD). This is taller than the height of a mid-rise building (defined as 12-15 storeys/30-50m in the GWC Masterplan and Capacity Study (GWC MCS) and the type of tall buildings to be promoted in the GWC area, according to the GWC MCS, and is therefore not justified by the evidence base presented for the Plan.

3.5 RBGK has consistently raised this as a key concern about the developing Plan throughout the consultation process and it is captured in both the 2020 SoCG between LBH-RBGK-LBRuT (and HE) and the current draft (2025) SoCG between LBH-RBGK-LBRuT (which is intended to be finalised prior to these Hearings).

3.6 Cluster CL6 and Focal Buildings FB6 and FB7 are of particular concern to RBGK. In CL6, there is a risk that FB6 will appear over the roof of the Grade I listed Orangery building and from views on the Great Lawn. RBGK also does not agree that it is acceptable to include a proposal for the Citadel site (FB7) that could be visible from within the Gardens. That these focal buildings could cause harm to RBGK is also contrary to the commitment to conserve and enhance the RBGK WHS set out in part C and N(I) of CC3, parts D, W and CC of Policy CC4 and Policy CC1 i.e. it is contradictory to permit tall buildings within views of RBGK and also commit to conserving and enhancing the asset.

3.7 RBGK considers that the heights should be reduced to minimise this risk and therefore ensure the Plan is both justified and effective. RBGK also notes that Policy P1, which also relies on these focal buildings, and the references within it, would need to be updated to reflect these amended (reduced) heights.

3.8 RBGK notes that the heights set out in Table CC 3.2 were, in previous versions of the draft Plan, framed as 'indicative appropriate building heights' and that this was later changed (as in the Submission version) to 'maximum permissible heights', which RBGK considered a positive change as it provided greater clarity and certainty as to the acceptability of specific heights in designated areas.

3.9 RBGK understands (as reference in the SoCG between LBH and HE) that the intention is to change this wording again in the final version of the Plan, back to 'appropriate'. RBGK is strongly of the view that this amendment offers insufficient clarity as to what would constitute an acceptable height on a specific site, and therefore could provide the opportunity for buildings taller than the stated heights to be brought forward to the potential detriment of the WHS.

3.10 This approach is also not well justified by the evidence submitted to support the Plan. LBH asserts (in the 2025 SoCG, Appendix B) that the GWC MCS sets out the process by which the Cluster envelopes account for the RBGK WHS OUV and heritage significance. If the stated heights in Table CC 3.2 have been informed by a robust appraisal of the maximum height that could be achieved on each site without detriment to the OUV of the WHS, then wording that could allow for further flexibility in height is not supported by the evidence and therefore the Plan cannot be considered sound. The wording should therefore remain 'maximum permissible'.

### **Brentford Town Centre**

3.11 RBGK's concerns about the evidence to support the identified locations for tall buildings are primarily focused on the GWC corridor area (and the evidence base provided by the GWC MCS), given its proximity to the WHS and the location of a number of proposed building clusters and focal buildings within key views from Kew Gardens.

3.12 It would however also highlight the Brentford Town Centre area assessed in the TBS, and its location directly adjacent to the WHS buffer zone within LBH, as it appears that no views from within Kew Gardens have been used to test the appropriateness of the Brentford Town Centre area for tall buildings in the TBS. RBGK remains concerned that the evidence base has not properly assessed the potential impact of tall buildings in the Brentford Town Centre area on Kew Gardens and its irreplaceable heritage assets.

3.13 In the latest version of the LBH-RBGK-LBRuT SoCG (2025), LBH refers to an explanatory note regarding the tall building on 2-10 London Road which is appended to the signed SoCG with the GLA (document ref. EX5e). RBGK does not believe this provides the necessary reassurances that all relevant views from Kew Gardens have been considered and no visual evidence is provided. Without a clear understanding of which view points were assessed and the reason for discounting them, this issue remains unresolved and RBGK remain unconvinced that the evidence base justifies this policy approach. RBGK considers that explicit clarification that the views on pages 127-130 of the current WHS

Management Plan have been assessed is necessary to consider the approach to building heights in Brentford Town Centre is justified and that the Plan is therefore sound.

### Tree cover

3.14 LBH also makes reference in the latest version of the SoCG (2025) to the use of trees in Brentford to screen development that intrudes on key views from within Kew Gardens. LBH acknowledges it does not think this is 'desirable' and has planned site allocations such that they do not appear above the treeline. However, it also states that it 'does not agree that a view through the trees of a well-designed building is harmful to Kew, whether this tree screening be evergreen or deciduous'. RBGK fundamentally disagrees with this attempted justification of development that could harm the OUV of the RBGK WHS.

3.15 One of the attributes of the OUV of RBGK WHS is 'a rich and diverse historic cultural landscape providing a palimpsest of landscape design', and one of the key surviving physical features of the historic cultural landscape is the 'strongly enclosed sense of 'otherworldliness' within the high walls and tree shelterbelts'. Of utmost importance to conserving the OUV then is the protection of the skyline from and around Kew Gardens such that development does not intrude and this 'otherworldliness' is maintained.

3.16 Appeal decisions (e.g. Citroen Site, Chiswick Curve, Capital Interchange Way) have consistently agreed that any built form visible from Kew Gardens will have a harmful impact on its OUV. RBGK would particularly like to draw attention to the Inspector's decision-making in the case of the Chiswick Curve scheme (60m) which included the finding that the very visibility of a tall building would amount to harm to designated heritage assets at Kew Gardens: "*...If one accepts, and I do, that the experience of the designed and historic cultural landscape of Kew Gardens, the iconic architectural legacy, and the living plant collections, is revealed and enhanced by the ability to appreciate these qualities in a well preserved environment that still resonates with the sense of an Arcadian escape from the world of intense city living, then the visibility of the Chiswick Curve, as part of the city beyond, would have something of a harmful impact on the setting of Kew Gardens, and as a result, the OUV of the WHS, and its significance and the significance of the Registered Park and Garden and the conservation area.*"

3.17 Although trees are an integral part of the fabric of Kew Gardens and their management forms an important part of Kew's work, RBGK cannot accept that the harm caused by a permanent structure that intrudes on the landscape from within Kew Gardens can be fully mitigated the presence of trees that could be temporary and subject to change. The trees on the riverside, between Kew Gardens and LBH, are not under RBGK's management, and therefore cannot be relied upon to mitigate harm.

3.18 The position that built form must not intrude on views from and within Kew Gardens to protect the OUV of the WHS must be reflected in all relevant policies throughout the Plan in order for it to be considered sound. RBGK strongly asserts that it is not acceptable that 'well designed' development visible from Kew Gardens, and/or development that is partially or substantially hidden by the tree line, is considered not to harm the OUV.