



**London Borough  
of Hounslow**

**Hounslow Local Plan 2020-2041**

**Statement of Common Ground**

**Between**

**London Borough of Hounslow**

**And**

**London Borough of Richmond upon Thames**

**And**

**Royal Botanic Gardens, Kew**

**Version 3  
16/01/2026**

## 1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared between the London Borough of Hounslow (LBH), the London Borough of Richmond upon Thames (LBRuT) and Royal Botanic Gardens, Kew (RBGK). LBH and LBRuT are neighbouring local authorities, and therefore subject to the duty to cooperate, whilst RBGK is an interested party and key stakeholder relating to the strategic matters to be agreed in this SoCG.
- 1.2. This SoCG seeks to inform the independent examination of the proposed submission version of the Hounslow Local Plan 2020-2041 and will be submitted to the Planning Inspector ahead of the examination hearings.
- 1.3. LBH adopted their Local Plan 2015-2030 Volumes 1 & 2 in 2015. As instructed by their Inspector at that time, LBH went on to undertake a partial review of the local plan focusing on 2 key growth areas: the Great West Corridor and Heathrow (known as the 'West of Borough') opportunity areas. Following extensive consultation, LBH submitted three development plan documents (DPDs, one for each area and an update to the Vol.2 Site Allocations DPD) for examination in December 2020, with examination hearing sessions taking place in November/December 2021. Following the hearing sessions, a number of procedural issues were identified which led LBH to withdraw these DPDs in July 2023 and indefinitely pause work on a Focused Issues Review of the Local Plan Vol.1.
- 1.4. LBH undertook a Regulation 18 consultation between 1<sup>st</sup> November and 17<sup>th</sup> December 2023 focusing on a proposal to consolidate the emerging DPDs into a single Local Plan document, and to update emerging policies in line with relevant considerations. Following this, LBH prepared updates to key evidence base documents and developed the proposed submission version of the Hounslow Local Plan 2020-2041 (HLP), undertaking a Regulation 19 consultation on the draft Local Plan between 6<sup>th</sup> September and 28<sup>th</sup> October 2024. LBH submitted the draft Hounslow Local Plan 2020-2041 to the Secretary of State for independent examination on 23<sup>rd</sup> June 2025.
- 1.5. This SoCG sets out all parties agreed positions in relation to strategic cross-boundary matters relating to the approach to tall buildings and the impact on views and settings of the Royal Botanic Gardens, Kew World Heritage Site (Kew WHS) and its buffer zone within LBH's emerging Local Plan. Engagement on this matter has been informed by formal representations and duty to cooperate meetings and subsequent correspondence.

## 2. Background

- 2.1. Prior to initiating the current draft of the Hounslow Local Plan, engagement took place on the now-withdrawn Local Plan Review for the Great West Corridor, West of Borough, and Site Allocations DPDs. This process resulted in LBRuT and LBH signing up to the [LB Hounslow Joint Statement of Common Ground \(September 2020\)](#) (relating to general strategic matters), and LBH, LBRuT and RBGK signing up to the [LB Hounslow, Royal Botanical Gardens Kew & LBRuT SoCG \(December 2020\)](#) (relating specifically to matters relating to heritage and tall buildings within the Great West Corridor plan area).
- 2.2. This SoCG effectively aims to update the LB Hounslow, Royal Botanical Gardens Kew & LBRuT SoCG (December 2020) in the context of the production of LBH's single Local Plan, now known as the Hounslow Local Plan 2020-2041.

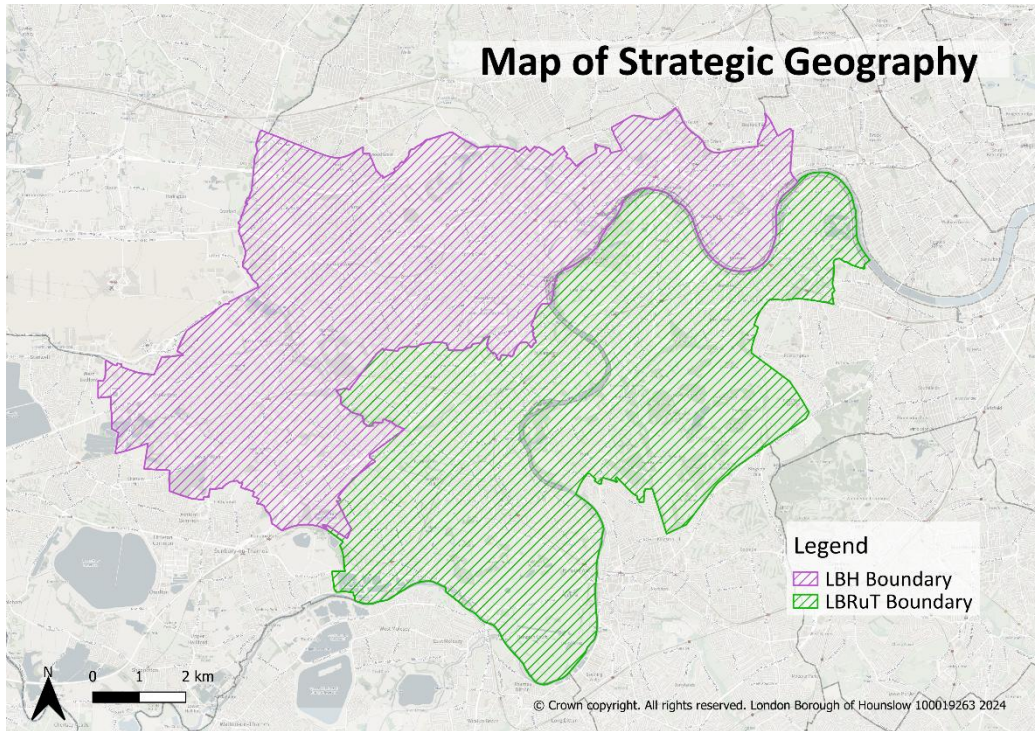
- 2.3. LBH has engaged with LBRuT on the production of the emerging Richmond Local Plan. This led to the production of a [Statement of Common Ground between London Borough of Richmond upon Thames and London Borough of Hounslow \(June 2024\)](#) which focuses primarily upon engagement between both parties on strategic matters with a focus on the emerging Richmond Local Plan.
- 2.4. LBH contacted LBRuT on 20th October 2023 to request engagement on the Regulation 18 consultation on the consolidated single Local Plan (which ran between 1<sup>st</sup> November and 17<sup>th</sup> December 2023). LBRuT confirmed by email that officers had reviewed LBH's Regulation 18 Statement, and noted the summary of the proposed changes to bring together as a single consolidated Local Plan. LBRuT confirmed that no duty to cooperate meeting was required at this stage, and that both parties would engage further at Regulation 19 stage when a draft version of the emerging Plan was available for review. LBRuT also confirmed that, as per previous engagement, housing and the historic environment remain strategic, cross-boundary issues, with site allocations, transport impacts, the River Thames, protection of designated open spaces and land for biodiversity discussed previously as being important issues in the vicinity of the shared boundary. LBRuT did not submit a representation to the Regulation 18 consultation.
- 2.5. LBH contacted LBRuT on 6<sup>th</sup> September 2024 to request engagement on the Regulation 19 consultation on the proposed submission version of the Hounslow Local Plan 2020-41. The Regulation 19 consultation ran between 6<sup>th</sup> September and 28<sup>th</sup> October 2024.
- 2.6. A duty to cooperate meeting between LBH and LBRuT was held on 8<sup>th</sup> October 2024. The key matters discussed at the meeting related to:
  - Approach to housing
  - Approach to employment
  - Proposed context and character policies, including engagement on potential tall buildings and heritage impacts affecting Royal Botanic Gardens, Kew WHS
  - Green Belt and Green and Blue infrastructure
  - Transport connectivity
  - Energy and Carbon Reduction Policy
  - LBRuT updated on Richmond Local Plan progress.
- 2.7. LBRuT submitted their representation to the Regulation 19 consultation of the draft Hounslow Local Plan in two parts. The representation sent by email on 28<sup>th</sup> October 2024 relates to the plan as a whole, with broadly supportive comments on each policy chapter. A further representation was submitted by email on 8<sup>th</sup> November 2024 (in line with an agreed extension to the deadline) focusing on Chapter 6 (Context and Character) and strategic, cross-boundary issues in relation to tall buildings and the impact on views and settings of key heritage assets, especially the Kew WHS and its buffer zone, as well as Conservation Areas and river views, within the London Borough of Richmond upon Thames. The latter representation raised various soundness concerns related to policies P1 (a-c), CC1, CC3 and CC4, and proposes various suggested modifications to address these.
- 2.8. RBGK submitted a Regulation 19 representation on 8<sup>th</sup> November 2024. RBGK raised various soundness objections relating to policies in Chapter 6 – Context and Character, as well as place policies P1(a-c) relating to the Great Western Corridor area. RBGK presented various suggested modifications and expressed a desire to engage on updating the LBH, LBRuT & RBGK SoCG (2020).

2.9. Following the Regulation 19 consultation, a combined duty to cooperate meeting was held on 8<sup>th</sup> January 2025 between LBH, LBRuT, Historic England (HE) and RBGK to discuss cross boundary strategic matters relating to the approach to tall buildings and the impact on views and settings of the Kew WHS and its buffer zone. During the meeting, LBH displayed online a working table with comments and modifications seeking to address comments received at Regulation 19 stage from all parties present, but the details were not made available to attendees from other organisations until these were subsequently shared as part of a draft SoCG. Key matters presented by LBH for discussion at the meeting included:

- Key matters and potential modifications where common ground was perceived to exist at this time, as put forward by LBH, particularly in relation to:
  - Corrections to Policy CC3 wording and figures for accuracy and consistency
  - Mapping amendments for clarification
  - Clarifications around the status of the GWC Masterplan & Tall Buildings Study, and definitions
  - Minor correction to references to significant adverse impacts, and to heritage impact assessments and townscape analysis
  - Amendments to the HIA in the Tall Buildings study appendix
  - Additional references to HIAs and ICOMOS guidance in Policy CC4, and engagement with RBGK and LBRuT
  - General policy formatting points
- Key matters where common ground was not perceived to exist at this time, as put forward by LBH:
  - HE request for detailed HIAs for site allocations
  - Various updates to GWC Masterplan
  - Amendments to tall buildings heights in GWC to reflect differing views on harm to Outstanding Universal Value (OUV) of Kew WHS
- General discussion on approaches to agreeing positions within a single or multiple SoCG/s.

2.10. Following the meeting, parties corresponded via email to discuss the most effective way to demonstrate engagement on strategic matters through a SoCG. In light of HE's desire to pursue a bilateral LBH & HE SoCG with LBH, it was decided that LBH, LBRuT and RBGK should seek to update the existing LBH, LBRuT & RBGK SoCG (2020) to agree positions on tall buildings and heritage (including the impact on Kew WHS). This SoCG should be read in conjunction with the LBH-LBRuT SOCG (2025) which concerns all other strategic matters between these two parties.

### 3. Strategic Geography



**Figure 1:** Map of strategic geography

3.1. The map above (Figure 1) describes the strategic geography considered for cooperation on strategic matters as part of this Statement of Common Ground. The area contains the administrative areas of LB Hounslow and LB Richmond upon Thames, and includes the Kew WHS site and buffer zone.

#### 4. Strategic Matters and Record of Agreement

- 4.1. Through ongoing duty to cooperate engagement between LBH, LBRuT & RBGK, the following key strategic matters have been identified:
- **The soundness of Policy CC3 - Tall Buildings**
  - **The soundness of Policy CC4 – Heritage**
  - **Continued cooperation on heritage matters**
- 4.2. These matters are set out in more detail below, with a description of the relevant background to the matter in question and a record of agreement provided. Where common ground has been reached on potential policy modifications, these are presented in Appendix A. In cases where there are matters which cannot be agreed at this time, these are set out as outstanding matters under each matter below as well as in Appendix B.
- 4.3. **The Soundness of Policy CC3- Tall Buildings**

##### ***Background***

4.3.1. RBGK and LBRuT's Regulation 19 representations express soundness concerns in relation to Policy CC3 Tall Buildings. Concerns from both parties are expressed in relation to the identification of overly broad areas that are appropriate for tall buildings. Both parties raise concerns regarding inconsistencies within the evidence base in relation to the definitions of tall buildings and how this has informed the definition of tall buildings in the policy. Concerns are also expressed by both parties that there is a risk of harm to the OUV of Kew WHS from Tall Buildings. The representations also raise issues with the wordings in the policy and its consistency with the NPPF and suggest other textual changes.

##### ***Record of agreement***

4.3.2. In response to this, LBH has agreed to present a number of modifications to the policy and supporting text to correct a mistake in the Regulation 19 version that referred to the definition map as the area appropriate for tall buildings, and referring to the correct figure which has tightly drawn site boundaries for areas appropriate for tall buildings. Other modifications are also agreed to be presented in relation to clarifying the definition of tall buildings and providing explanations for how this definition draws on the Tall Building Study (2024) and Great West Corridor Masterplan- Revision (2020). A number of other textual modifications are presented to align with the NPPF and other changes arising from the suggestions made in the representations.

4.3.3. The above proposed modifications are outlined in Appendix A.

##### ***Outstanding Matters?***

4.3.4. LBRuT and RBGK raised significant concerns regarding the soundness of Policy CC3 Tall Buildings. There remain outstanding matters in relation to the overall approach to tall buildings, including questions around the clarity and timeliness of the supporting

evidence base, which are matters to be presented to the Inspectors for their consideration as part of the examination process.

- 4.3.5. LBRuT and RBGK express concern in regard to tall building clusters which could appear in views from Kew WHS and the buffer zone. LBH would first highlight the differences in assessment of where harm is caused, especially in the case of the Kew WHS. RBGK maintains that tree planting and screening does not protect the site from development in Brentford and the WHS's significance relies on protecting the enclosed, "otherworldly" historic landscape and its skyline from and within Kew Gardens; appeal decisions have consistently found that any built form visible from RBGK causes harm. RBGK maintains that tree screening cannot be treated as mitigation for permanent built intrusion, particularly where riverside trees are outside RBGK's control and may change over time. Accordingly, RBGK maintain that plan policies must clearly require that development does not intrude into views from Kew Gardens, whether partially screened by deciduous or evergreen trees or not.
- 4.3.6. LBH agrees the visual intrusion of development into Kew Gardens is not desirable and, as such, has identified appropriate locations for tall buildings and appropriate heights such that they do not appear above the treeline - with one exception for a site with an extant consent which was made before inscription of the Kew WHS in 2002 (the WHS was inscribed in 2003). However, LBH does not agree that a view through the trees of a well-designed building is harmful to the significance of or OUV of Kew, whether this tree screening be evergreen or deciduous. RBGK does not accept LBH's position that visibility of "well-designed" development through tree cover is not harmful to the OUV of the RBGK WHS.
- 4.3.7. LBH is of the view that a fuller and more comprehensive conclusion on harm is not possible at the plan-making stage; and that the proposed Clusters or individual sites cannot themselves entail or cause harm, being a site allocation rather than a detailed planning proposal as would be presented at planning application stage. This is why LBH continues to ask for a full HIA from applicants at both pre-application and application stages.
- 4.3.8. LBH is of the view that it has taken the correct approach in terms of plan-making, in accordance with national policy and in general conformity with the London Plan. The NPPF requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment and requires this strategy to take into account the desirability of sustaining and enhancing the significance of heritage assets. The approach to tall buildings in the Local Plan is part of that strategy, with the potential heights and areas for tall buildings being informed through an understanding of the character of the Borough and the significance of heritage assets, and taking an approach that seeks to add no harm.
- 4.3.9. LBH considers that a number of the recommended modifications are not required to address soundness or legal compliance matters, and these are set out in Appendix B, along with the reasoning for this. LBH's answers to clarification questions are also set out in this section.

#### 4.4. The Soundness of Policy CC4- Heritage

### ***Background***

4.4.1. LBRuT's and RBGK's Regulation 19 representations express soundness concerns relating to potential impacts on Kew WHS and its buffer zone around whether the policy is effective, given the need for cross boundary and partnership working to address the strategic issues relating to heritage assets. The representations make a number of recommendations to address this through proposed modifications.

### ***Record of agreement***

4.4.2. In response to this, LBH has agreed to present a number of modifications to the policy and supporting text to support early meaningful pre-app engagement by applicants with appropriate levels of detailed information where there is the potential for the Kew WHS to be impacted, and to add reference to the WHS Management Plan and the UNESCO guidance on HIAs. LBH has agreed a to present modifications to CC4 policy text to align it with the terminology used in the PPG in relation to WHS and their OUV, and to the NPPF. Textual changes are also proposed to reduce the reliance on visual impact assessment to determine effects on development of heritage assets. These proposed modifications are outlined in Appendix A.

### ***Outstanding Matters?***

4.4.3. LBRuT and RBGK raised significant concerns regarding the soundness of Policy CC4 Heritage. There remain outstanding matters in relation to the overall approach with the need for clear and accurate terminology related to the historic environment, which are matters to be presented to the Inspectors for their consideration as part of the examination process.

## **4.5. Continued cooperation on heritage matters**

### ***Background***

4.5.1. LBH, LBRuT and RBGK have engaged extensively on the development of policies relating to tall buildings, heritage and the potential impacts of development within the Great West Corridor area upon the views and setting of the Kew WHS site and its buffer zone. There is a shared commitment to ensure this engagement continues into the future to ensure any impacts from tall building development can be fully addressed as part of the development management process.

### ***Record of agreement***

4.5.2. LBH will ensure that all tall buildings applications which may have an impact on Kew WHS will undergo early and comprehensive consultation with both LBRuT and RBGK.

4.5.3. All parties will continue to engage on this matter at a more strategic level in future as per the governance arrangements set out in section 5 below.

### ***Outstanding Matters?***

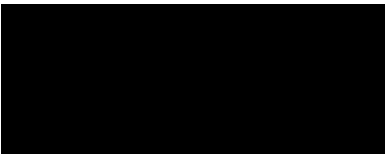
4.5.4. LBRuT and RBGK are concerned about whether the policy approach will be effective, to enable cross-boundary and partnership working to address issues through the consideration of planning applications, which are matters to be presented to the Inspectors for their consideration as part of the examination process.


**5. Governance Arrangements**

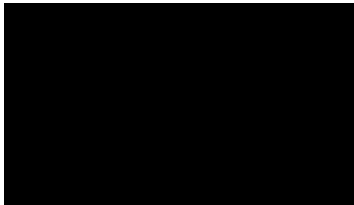
- 5.1. It is agreed that informal discussions will occur between all parties on the cross-boundary issues and strategic matters referred to in this Statement of Common Ground in the form of officer level meetings, ideally at least once every twelve months, with reporting of matters to Member level if necessary.
- 5.2. It is agreed that this Statement of Common Ground will be reviewed by all parties at a joint duty to cooperate meeting which will ideally be held on an annual basis.

**6. Signed confirmation**

- 6.1. The contents of this Statement of Common Ground are agreed for the purposes of the examination of the proposed submission version of the LB Hounslow Local Plan 2020-2041.

<b>Signed on behalf of LB Hounslow</b>		
<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
<b>Vincent Lacovara Director of Planning and Buildings</b>		<b>16/01/2026</b>

<b>Signed on behalf of LB Richmond upon Thames</b>		
<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
<b>Adam Hutchings Spatial Planning and Design Team Manager</b>		<b>16/01/2026</b>

<b>Signed on behalf of Royal Botanic Gardens, Kew</b>		
<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
<b>Tracy Simmons World Heritage Site Coordinator</b>		<b>16/01/2026</b>

**APPENDIX A: Table of Agreed Modifications**

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
CC3	Responses by LBRuT states that this policy should explain the way views contribute to character and context to enhance clarity of the policy.	<p>CC3 N) X. Clearly demonstrate through appropriate townscape analysis, <del>and</del> verified views <u>and, where applicable heritage impact assessment</u>, how proposals:</p> <ul style="list-style-type: none"> <li>- <u>Conserve and</u> enhance the townscape,</li> <li>- <u>Conserve and enhance the significance setting</u> of surrounding heritage assets, <u>including any contribution made by their settings</u></li> <li>- <u>Respect and</u> local landmarks and positively contribute to the overall skyline and views and protect short, mid and long range views in addition to significant linear and panoramic views and the setting of the Thames;</li> </ul>	RBGK welcomes the amendments to wording used in policies CC1, CC3 and CC4 in relation to harm to heritage assets, including the OUV of the WHS. This wording throughout the Plan must <i>properly</i> and <i>consistently</i> reflect the current guidance in the NPPF (in particular para. 219) and the London Plan, and be compatible with the advice of HE and UNESCO.	While these modifications, which add additional reference to views are not objected to, they do not however address the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).
CC3	Responses by LBRuT and Kew state it is not clear which are the individual sites/zones/areas which	Correction of mistake in reg 19 version which referred to the incorrect map as the appropriate locations:	RBGK reserves its position on this modification pending:	The Maps are from separate sources and refer to different tall building types, so the

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
	<p>are being identified for tall buildings. There is an error in the reg 19 version which incorrectly referenced the tall building definition map as the appropriate locations map. Modifications are proposed to provide further clarity on the appropriate locations.</p> <p>Further clarity is also provided to the text in relation to tall building development outside the appropriate locations and definitions.</p>	<p>K. Be located in the areas identified as having potential for tall buildings, as shown in Fig <del>CC3.1</del> <u>CC3.3</u>;</p> <p>New figure to replace all the maps with a title as follows:</p> <p>Map to be entitled: <u>Figure CC3.3: Map showing areas identified as having potential for tall buildings and associated cluster/site codes.</u></p> <p>Amend Map at Figure CC3.3 as follows:</p> <p>Map of the full borough with all tall building sites indicated with site boundaries, tall building cluster outlines, focal buildings and local landmarks. Map will also only include the cluster/site codes (removing the height ranges &amp; AOD labels).</p> <p>Reformatting of table to highlight header rows.</p> <p>Correction to name of Cluster CL1</p> <p><del>Wyke Green Cluster</del> <u>Tesco Osterley Cluster (CL1)</u></p>	<p>a) review of the amended Figure CC3.3 which should show tightly-drawn mid-rise clusters as set out in the GWC Masterplan, including potential sites for tall and focal buildings.</p> <p>b) confirmation of the intention to include or exclude Figure CC3.1; and, if the intention is to include it, clarification of its content/title and how it will be referenced within the Plan text.</p>	<p>lack of clarity remains. While these modifications (HLP_C6_22, HLP_C6_30, HLP_C6_31) are not objected to, they do not however address the fundamental soundness concerns with the overall policy approach (see further details in Appendix B). There remains concern that the two approaches to defining tall buildings derived from the two different evidence base studies are not sufficiently reconciled by these modifications.</p>

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p>Appendix to be included with zoomed in versions of the maps (i.e. removing CC3.4-CC3.8 and moving updated versions, as above, to an appendix).</p> <p>Figure CC 3.3 (a): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes within the Great West Corridor:</p> <p>Figure CC 3.4-3 (b): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes for Feltham:</p> <p>Figure CC 3.5-3 (c): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes for Bath Road:</p> <p>Figure CC 3.6-3 (d): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes for Hounslow Town Centre &amp; London Road, Isleworth:</p> <p>Figure CC 3.7-3 (e): Map showing <u>areas identified as having potential for tall</u></p>		

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p><u>buildings and associated</u> cluster/site codes for West Middlesex University Hospital and Brentford Town Centre:</p> <p>Figure CC 3.8-3 (f): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes for Chiswick Town Centre Area:</p> <p>O. Buildings that do not meet the tall building definition, but which are still considered prominent in their surrounding context, for example two to three times the contextual reference height (<del>local scale tall building</del>), must respond appropriately to local contextual building heights and be compatible to their surroundings and the character of the area.</p> <p>6.11 The borough is predominantly low rise, characterised by two to three storey buildings giving a general building height of up to 10m. The majority of medium rise buildings can be found in and around town centres or along main routes such as the</p>		

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p>London Road. The tall buildings definition in Hounslow is based on local context, with the majority of the Borough being covered by a lower scale tall building definition, which is defined as any building or structure which is <del>over</del> 21m <u>or over</u> in height measured from the ground plane to the roof including the height of any rooftop plant. In parts of the borough where the existing building context height is greater (typically areas with context heights above 15m) there is a higher scale tall building definition, which is defined as any building or structure which is over 30m in height as measured from the ground plane to the roof, including the height of any rooftop plant. Some parts of the Borough are more sensitive to tall buildings, such as within Chiswick and Brentford town centres where there are many heritage designations and within the Thames Policy Area. Whilst the building context height in these areas exceeds 15m, the lower scale tall building definition applies. <u>The Tall Building definitions are underpinned by the evidence in the Tall Buildings Study, which takes into consideration the Great West Corridor Masterplan when defining tall buildings in this area.</u></p>		

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p>6.15-Where buildings are proposed that do not meet the definition of higher or lower scale tall buildings, but are still taller than their surroundings, proposals should be informed by an understanding of the surrounding <del>built</del>-context <u>and a full HIA</u>, referring to other relevant policies in the Local Plan, the Character, Sustainability and Design Codes SPD and the Tall Buildings Study for an understanding of context heights. <del>Tall buildings can be classified into different height categories based on the context height ratio. The following tall buildings classification is established in relation to the context height:</del></p> <ul style="list-style-type: none"> <li><del>▣ Local Scale Tall Building—2 to 3x context height;</del></li> <li><del>▣ District Scale Tall Building—3 to 5x context height; and</del></li> <li><del>▣ Metropolitan Scale Tall Building—5x and above context height.</del></li> </ul> <p>6.16 <del>The area used to establish the context height and the context height ratio will need to reflect the extent of the tall</del></p>		

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p><del>building's impact. Local scale tall buildings can use the context height of their immediate local and wider surroundings, while district scale tall buildings will need to consider heights across a wider area.</del></p>		
CC3 B & C	<p>Representations from RBGK, and LBRuT which requested that harm should be referred to instead of significant adverse impact to align with the NPPF. Requests to clarify wording to make meaning clearer</p> <p>LBRuT's representation seeks clarity on the terms shoulder height which are set out in the GWC masterplan and how this relates to the policy and clarity on which views to be protected.</p>	<p>B. Supporting a limited number of tall buildings in Brentford town centre. These should be <del>designed carefully and placed sensitively located and designed so as to avoid so as not to have a significant adverse impact on</del> <u>harm to the significance, including any contribution made by</u> setting of, <del>views from and between</del> heritage assets including <del>particularly the</del> Royal Botanic Gardens Kew World Heritage Site, Syon Park and the Thames <del>foreshore</del> landscape. They should also <del>respect</del> <u>conserve</u> and respond to the area's special townscape <del>and heritage value</del> and <del>protect</del> <u>conserve</u> views across</p>	<p>RBGK welcomes the amendments to wording used in policies CC1, CC3 and CC4 in relation to harm to heritage assets, including the OUV of the WHS. This wording throughout the Plan must <i>properly</i> and <i>consistently</i> reflect the current guidance in the NPPF (in particular para. 219) and the London Plan, and be compatible with the advice of HE and UNESCO.</p>	<p>While these modifications, which improve the terminology such as in relation to harm, and are not objected to, they do not however address the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).</p>

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p>the Thames, <del>including those from</del> <u>Richmond</u>;</p> <p>C. Supporting tall buildings along sections of the A4 Golden Mile</p> <p>frontage. These should be <del>carefully placed</del> <u>sensitively located and designed</u> so as not to create a wall of tall buildings, ensuring they relate sensitively to surrounding residential areas and <del>do not have a</del> <u>avoid harm to the significant</u> <del>ce, including any</del> <u>contribution made by setting, adverse impact on the setting of, or views from of</u> heritage assets including Gunnersbury Park, Royal Botanic Gardens Kew World Heritage Site, Syon Park and Osterley Park. <u>In the remainder of the Corridor, building heights should be informed by the 'shoulder heights' outlined in the GWC Masterplan, whilst also responding to townscape and heritage considerations</u></p>		
CC3	Correction in response to LBRuT's response that noticed a formatting error.	Amend N to part M I)		Agree to this modification to correct a typo.

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
CC3	Amendments in response to reps from RBGK and LBRuT that policy is amended to separate out the assessment requirements for each topic (townscape, visual and heritage assessment) for clarification.	<p>Linked to amendments to CC3 N) X.</p> <p>Add below X:                      XI) <u>Undertake a visual impact assessment to ensure all relevant views are examined as part of the application.</u></p> <p>Amend the lettering of following clauses</p>	<p>RBGK welcomes the additional supporting text (CC4 W – supporting text i – vi) that clarifies the requirement for a HIA that is in line with the requirements set out by UNESCO for development proposals that may affect the Outstanding Universal Value of the Kew World Heritage Site.</p>	<p>While this modification is welcomed, it does not however address the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).</p>
CC3	In response to LBRuT response that requests text clarifications to wording	<p>VIII) Demonstrate that development does not <del>harm adversely impact</del>, either individually or cumulatively, <del>on</del> the microclimate of the surrounding area, including wind vortices, noise, the urban heat island effect and over-shadowing- <del>Impacts , which should not have an adverse impact on the development site,</del> adjacent sites and public space. Changes to wind microclimate resulting from the development should not be such that the development site, adjacent sites and adjacent public spaces are no longer</p>		<p>These modifications are recognised as in response to LBRuT’s comments of poor wording and the suggestions are an improvement, albeit they do not however address the fundamental soundness concerns with the overall policy approach.</p>

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p>comfortable for their intended use. Developers should refer to the Character, Sustainability and Design Codes SPD for further guidance related to microclimate;</p> <p>XI) Carefully consider the façade and overall detailing to ensure visual interest, vertical and horizontal rhythms, an indication of how the building is inhabited, internal thermal comfort and the visual break-up of the building-<del>visually</del> at varying scales;</p>		
6.17	<p>LBRuT response which asks the text to refer to views from outside LBH for clarity. RBGK’s response suggests inclusion of a description of what constitutes appropriate analysis of townscape views.</p>	<p>6.17 Views, <u>including those from outside the borough boundary</u>, are identified within relevant sections of the Great West Corridor Masterplan, the Tall Buildings Study, the Character, Sustainability and Design Codes SPD and the Royal Botanic Gardens, Kew World Heritage Site Management Plan (2020-2025). All proposals for tall buildings must <u>include an assessment of</u> <del>consider</del> the individual and cumulative visual impacts of proposal in identified views and other locally</p>	<p>RBGK agrees to these modifications <i>if</i> an amendment is made to the final sentence to read ...’in addition to full leaf AND winter versions of all views...’ in order that this instruction makes sense.</p>	<p>Agree to the part of the modifications in relation to referencing views from outside the borough boundary, which are recognised as in response to LBRuT’s comments.</p> <p>Agree to the part of the modifications to clarify appropriate analysis of townscape views, which</p>

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		important views deemed relevant to the proposal, <u>in addition to full leaf and winter versions of all views, that include 3D massing models.</u>		are recognised as in response to RBGK’s comments. However, note the reference should be to full leaf <u>and</u> winter versions of all views.  However, suggestions do not address the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).
CC3 Supporting Facts	LBRuT’s representation seeks text that brings in the greater nuance from the tall buildings section of the CSD	The Character, Sustainability and Design Codes SPD (2024), within part A4, provides design guidance relating to tall buildings, <del>presenting design principles for tall building form,</del> <u>including guidance for form, clusters, local character, visualisation, consideration of the natural environment, their</u> <del>relationship to public realm</del> <u>design and how their design should address</u> micro-climatic and sustainability <del>aspects</del> <u>considerations.</u>		These modifications are recognised as adding additional context to reference the SPD, however they do not however address the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).
CC3 Supporting Facts	LBRuT’s and RBGK’s representations seek clarity on the terms	Add after last bullet:	RBGK supports this modification, and further amendments	These modifications raise a concern they add to confusion with

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
	<p>shoulder height which are set out in the GWC masterplan and how this relates to the definitions in the policy,</p>	<p><u>The building shoulder height, is the sheer height of a building at the back of the footway up to the eaves or parapet height. It is recognised that many buildings may have one or more additional storeys above this height as a set-back element.</u></p>	<p>that serve to reconcile the definition of a ‘tall building’ across the Plan as a whole, provided that they are clearly justified by the evidence base.</p>	<p>inconsistent definitions across the evidence base and the policy approach, and they do not address the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).</p>
CC4	<p>Comments from RBGK and LBRuT that the policy should support early meaningful pre-app engagement by the applicant with appropriate levels of details where there is the potential for the WHS to be impacted. The representations also request that the policy states that appropriate weight is given to the provisions in the Management Plan during the decision-making process. Comment from RBGK that suggests a correction from “Botanical” to “Botanic”</p>	<p>D. Working with Royal Botanic Gardens Kew World Heritage Site, London Borough of Richmond and Historic England <u>and the Thames Landscape Strategy</u> to conserve and enhance the outstanding universal values of The Royal Botanic Gardens, Kew World Heritage Site, its buffer zone and its setting, including views to and from this asset. This includes assisting in the <u>drafting and implementation of the World Heritage Site Management Plan and its provisions, giving appropriate weight to the provisions of the Management Plan in the decision making process, asking developers to consult and meet with Royal Botanic Gardens, Kew during formulation of their proposals both before and during any pre-application process and following any eventual submission of a proposal for</u></p>	<p>RBGK welcomes the amendments to wording used in policies CC1, CC3 and CC4 in relation to harm to heritage assets, including the OUV of the WHS. This wording throughout the Plan must <i>properly</i> and <i>consistently</i> reflect the current guidance in the NPPF (in particular para. 219) and the London Plan, and be compatible with the advice of HE and UNESCO.</p> <p>RBGK notes that the phrase ‘...unless there</p>	<p>These modifications are partly supported. The reference to the World Heritage Site Management Plan is welcomed. However there remains an issue in relation to early pre-app discussions: We propose an amendment to the modification to the policy wording as follows: “... of the Management Plan in the decision-making process, strongly encouraging developers to consult and meet with RBG Kew at the start of and throughout the pre-application process...”</p>

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p><u>consideration for planning permission, to ensure the OUV of Royal Botanic Gardens Kew is not harmed;</u></p>	<p>are wholly exceptional circumstances...’ is not aligned with the wording of the current NPPF and this should be deleted.</p> <p>RBGK requests that references to ‘Royal Botanical Gardens, Kew’ throughout the Plan are corrected to ‘Royal Botanic Gardens, Kew’.</p> <p>RBGK requests that references to the OUV of the Royal Botanic Gardens, Kew WHS are made in full throughout the Plan and are not abbreviated to ‘the OUV of Kew’ or similar</p>	<p>These modifications however would not address the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).</p> <p>As agreed in direct correspondence on the last part of D “unless there are wholly exceptional circumstances in accordance with the NPPF” agreed with other parties this is not necessary and should be deleted.</p>
CC1	Response from LBRuT and RBGK that the phrasing “should not have a significant impact on” does not reflect the	Insert clause CC of CC4 after G) III) (and remove from CC4) and amend wording as follows for consistency with the rest of CC1  CC1 G) IV. Conserve and enhance any strategic or local views identified in the	RBGK welcomes the amendments to wording used in policies CC1, CC3 and CC4 in relation to harm to heritage assets,	While these modifications which improve the terminology in relation to harm and reference the buffer zone, are not objected

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
	<p>NPPF wording and that it should state ‘adverse impacts’.</p> <p>The movement of this text to policy CC1 is in response to comments from RBGK that views are not of themselves heritage assets and the management of them is more to do with their context, and therefore would better sit in CC1 to enhance clarity of the policy.</p>	<p>Hounslow Characterisation and Growth Study and Character, Sustainability and Design Code SPD and undertake a visual impact assessment to demonstrate no <del>adverse</del> <b>harmful</b> impacts on the designated view or on views from Royal Botanic Gardens Kew World Heritage Site <b>or the buffer zone</b>. Avoid any further harm to the setting and views of the Thames, ensuring any identified significant linear and panoramic views of the Thames are tested to understand the impact of development.</p> <p>Amend clause lettering to match formatting.</p>	<p>including the OUV of the WHS. This wording throughout the Plan must <i>properly</i> and <i>consistently</i> reflect the current guidance in the NPPF (in particular para. 219) and the London Plan, and be compatible with the advice of HE and UNESCO.</p>	<p>to, they do not however address the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).</p>
<p>CC1 and through out policies.</p>	<p>Response from LBRuT and RBGK stating that there is an overreliance on visual impact assessment to determine effects on development of heritage assets and that a setting can included non-visual elements.</p>	<p>Insert clause H of CC4 after CC1 B (and remove from CC4):</p> <p>H. Conserving and enhancing the strategic and local views identified in the Hounslow Characterisation and Growth Study and the Tall Buildings Study, or any subsequent update, that give the borough its character, visual richness and coherence; and by maintaining and updating a schedule of views;</p>	<p>RBGK welcomes the additional supporting text (CC4 W – supporting text i – vi) that clarifies the requirement for a HIA that is in line with the requirements set out by UNESCO for development proposals that may affect the Outstanding</p>	<p>While these modifications, which improve the terminology, are not objected to, they do not add further detail to assessing non-visual elements, and do not alter the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).</p>

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p>Wording changes have been suggested to policies throughout to refer to the “significance, including contribution made by setting”. A breakdown of these modifications can be provided- for succinctness, these have not been included here.</p>	<p>Universal Value of the Kew World Heritage Site.</p>	
<p>CC4 6.18</p>	<p>Comments from LBRuT and RBGK that reference to the ICOMOS guidance on HIAs is added to supporting text.</p>	<p>6.18 The borough enjoys a network of heritage assets and aspects that defines its origins and illustrates distinctiveness. A heritage asset can be a landscape, place, building, monument or feature that has been identified as having special architectural or historic interest. Within the borough, these range from Grade I statutorily Listed Buildings such as Syon House, located with other listed buildings in registered Syon Park and lying within Isleworth Riverside’s</p> <p>designated conservation area, to individual or groups of buildings that are locally listed for their contribution to an area’s character.</p> <p>Break for new para:</p>	<p>RBGK welcomes the additional supporting text (CC4 W – supporting text i – vi) that clarifies the requirement for a HIA that is in line with the requirements set out by UNESCO for development proposals that may affect the Outstanding Universal Value of the Kew World Heritage Site.</p>	<p>While these modifications which add reference including to the buffer zone and the ICOMOS HIA guidance, are not objected to, they do not alter the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).</p>

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p>6.19 Outside the borough, the Royal Botanic Gardens, Kew World Heritage Site lies in the London Borough of Richmond. Its international importance is set out in the Statement of Outstanding Universal Value and part of its buffer zone falls within the London Borough of Hounslow. <del>Five</del> <u>attributes that contribute to the Outstanding Universal Value of the Royal Botanic Gardens, Kew WHS are set out in the Kew WHS Management Plan. Of these five, attributes i 'a rich and diverse historic cultural landscape providing a palimpsest of landscape design' and ii 'an iconic architectural legacy' engage the planning process with regard to setting. Policy CC4 (together with the other policies in the plan) are designed to protect Kew Gardens from the visual impact of tall buildings and, to a lesser extent, other impacts such as noise and traffic associated with new development.</u></p>		

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p>New paragraph:</p> <p><u>6.20 Part of the Royal Botanic Gardens, Kew WHS's buffer zone falls within the London Borough of Hounslow. Buffer Zones are identified in the Operational Guidelines for the Implementation of the World Heritage Convention as an optional measure for protecting the OUV of World Heritage Sites. Not all World Heritage Sites have a Buffer Zone nor do all sites require them. The buffer zone of the RBG Kew WHS encompasses areas of land with strong historical relationships to the Gardens (the Old Deer Park, Syon Park and Kew Green), some locations that are important to the protection of significant views (e.g. Syon Park); and areas that have a bearing on the character and setting of the gardens (the River Thames and its islands between Isleworth Ferry Gate and Kew Bridge; and approaches to the Gardens from the east). These assets, including Royal Botanic Gardens Kew WHS all form part of the Arcadian Thames Landscape (itself a heritage asset), whose character is further detailed in the Thames Landscape Strategy. Development in and</u></p>		

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p><u>outside this Buffer Zone may threaten the setting and significance of RBGK. Furthermore, the buffer zone does not encompass all of the setting of the WHS and change outside of the buffer zone could affect the setting of the WHS.</u></p> <p>New paragraph:</p> <p><u>6.21</u> Syon Park is specifically mentioned as being the focus of one of the garden vistas on the opposite banks of the Thames. Its setting includes, affects and contributes to the borough, including Syon Park. We have a duty to assist in preserving Royal Botanic Gardens Kew’s Outstanding Universal Value which includes a rich and diverse historic landscape and an iconic architectural legacy, which in turn provides <del>benefit in</del> <u>significance, including contribution made by setting to views and character to, and recognition of,</u> the assets of the London Borough of Hounslow. <del>The</del> <u>UNESCO method of Heritage Impact Assessment for World Heritage Sites as well as the London Plan and the Mayor of London's SPG on London's World Heritage Sites will be taken</u></p>		

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p><u>into account when assessing proposals. Proposals will be carefully scrutinised for their likely effect on the Royal Botanic Gardens, Kew World Heritage Site or its setting where these occur within the defined buffer zone and wider and more extensive setting of the World Heritage Site, including views to and from the site.</u></p> <p>Amend paragraph numbering to fit format</p>		
CC4	<p>In response to reps from LBRuT that the policy text is aligned with the terminology used in the PPG in relation to WHS and their OUV and that additional criteria relevant to proposals affecting Kew Gardens could be included. Supporting text added to clarify the policy text additions. RBKG’s representation suggests</p>	<p>W. Conserve, <del>and enhance</del> <del>and safeguard</del> <del>the historic integrity, character and appearance and avoid any further harm to the internationally recognised</del> <u>the</u> Outstanding Universal Value, <u>authenticity and integrity</u> of the Royal Botanic Gardens Kew World Heritage Site, its Buffer Zone and its significance, setting, including views to and from the site. <u>World Heritage sites are of the highest significance and their conservation should be given the greatest weight.</u></p> <p>Add in supporting text:</p>	<p>RBGK welcomes the amendments to wording used in policies CC1, CC3 and CC4 in relation to harm to heritage assets, including the OUV of the WHS. This wording throughout the Plan must <i>properly</i> and <i>consistently</i> reflect the current guidance in the NPPF (in particular para. 219) and the London Plan, and be compatible with the</p>	<p>While these modifications which add reference including to the World Heritage Site Management Plan and the planning process, are not objected to, they do not alter the fundamental soundness concerns with the overall policy approach (see further details in Appendix B).</p>

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
	<p>further description should be added of how developers should work with RBGK, LBRuT and HE.</p>	<p><u>i) Applications for development proposals that may affect the Outstanding Universal Value of the Kew World Heritage Site should be informed by a Heritage Impact Assessment Undertaken in line with the Guidance and Toolkit for Impact Assessment in a World Heritage Context or any successor document and engage with Historic England early in the process</u></p> <p><u>ii) Appropriate weight will be given to implementing the provisions of the World Heritage Site Management Plan when considering planning applications.</u></p> <p><u>iii) Applications for development proposals likely to have an impact on the Royal Botanic Gardens Kew World Heritage Site or its Buffer Zone will be required to provide 3D massing models to enable assessment of cumulative impact of development where relevant.</u></p> <p><u>iv) It is expected that there will be meaningful engagement with the London Borough of Richmond upon Thames, Historic England and Royal Botanic Gardens Kew early in the process, and with an appropriate amount of detail accompanying an application, where</u></p>	<p>advice of HE and UNESCO.</p> <p>RBGK welcomes this additional supporting text. If it is intended to be framed/used as a 'checklist', it should be included in the relevant policy wording as a list of requirements for developments that may affect the OUV of the RBGK WHS.</p> <p>References to the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context should be properly and consistently referenced where relevant in this supporting text.</p>	

Section/ Policy /Para	Reason for modification	Agreed modification text (tracked)	Additional RBGK comments (if required)	Additional LBRuT comments (if required)
		<p><u>development is likely to impact on the Royal Botanic Gardens Kew World Heritage Site or its buffer.</u></p> <p><u>(v) This process should involve engagement in a planning performance agreement (PPA) that sets a framework for the Council’s consideration of a proposal and engagement with an appropriate Design Review Panel.</u></p>		
Contents page	RBGK’S representation notes that a correction is required to the contents page	<p>P1 (a) – Great West Corridor <del>East</del><u>West</u></p> <p>P1 (c) – Great West Corridor <del>West</del><u>East</u></p>		Agree to this modification to correct a typo.

**APPENDIX B: Table of Outstanding Matters**

Description of matter/s which remains outstanding	LBH comments	RBGK comments (if required)	LBRuT comments (if required)	Agreed next steps
<p>Responses by LBRuT and RBGK state it is not clear which are the individual sites/zones/areas which are being identified for tall buildings.</p>	<p>LBH refers to the modifications suggested in row 2 of the table in Appendix A.</p>	<p>RBGK agrees that this issue remains unresolved.</p>	<p>There remain concerns that there is a lack of clarity regarding the mapping, using separate sources from the evidence base in the Tall Buildings Study and the Great West Corridor Masterplan.</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>
<p>Responses from LBRuT and RBGK that express concern in regard to tall building clusters which could appear in views from Kew Gardens and the buffer zone. RBGK specifically raise concerns in relation to CL6 and FB6.</p>	<p>The mid-rise clusters are referred to in the GWC Masterplan, a document that underpins the tall building appropriate locations and heights in the GWC in the Local Plan Policy. This masterplan document clearly sets out the process by which the Clusters envelopes account for OUV and heritage significance. An appendix to the GWC masterplan considers the impacts of proposals on heritage significance and OUV</p> <p>The Council would first highlight the differences in assessment of where harm is caused, especially in the case of the Royal Botanic Gardens Kew World Heritage Site. Despite a history of tree planting and screening to “hide” Brentford from Kew, including in their most recent Management Plan RBGK</p>	<p>RBGK’s concerns continue to include the height of FB7, in addition to concerns about CL6 and FB6.</p> <p>RBGK fundamentally disagrees with the attempted justification (‘...the council does not agree that a view through the trees of a</p>	<p>There remain concerns that there is not a robust evidence base without sufficient testing of views from Kew Gardens. As established in the Chiswick Curve scheme appeal, there should be an assessment of the impact on the setting of Kew Gardens, and its buffer zone. Harm can still occur in winter/if trees are removed or die, and</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>

Description of matter/s which remains outstanding	LBH comments	RBGK comments (if required)	LBRuT comments (if required)	Agreed next steps
	<p>maintains that tree planting and screening to protect the site from visual intrusion in Brentford is not acceptable and never would be. The Council agrees this is not desirable and, as such has planned site allocations such that they do not appear above the treeline- with one exception for a site with an extant consent, which was made before inscription of the WHS in 2002 (the WHS was inscribed in 2003). However, the Council 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.</p> <p>Secondly, the Council is of the view that a fuller and more comprehensive conclusion on harm is not possible at the plan-making stage; and that the proposed Clusters or individual sites cannot themselves entail or cause harm, being a site allocation rather than a detailed planning proposal at planning application stage. This is why the Council has asked for a full HIA from applicants at both pre-application and application stage.</p> <p>The Council is of the view that it has taken the correct approach in plan making, in accordance with national policy and in general conformity with the London Plan. The NPPF requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment and requires this strategy to take</p>	<p>well-designed building is harmful to Kew...') of development that could harm the OUV of the RBGK WHS. As set out in RBGK's Written Statement to the Hearings (Matter 8), of utmost importance to conserving the OUV of the RBGK WHS is the protection of the skyline from and around Kew Gardens such that development does not intrude and this 'otherwordliness' is maintained. Refer to RBGK's Written Statement for further detail.</p>	<p>succession planning cannot be relied upon given climate change pressures. Reliance on HIAs at pre-app and application stage will not be effective, as the principles of the policy approach will be enshrined in the Local Plan, creating uncertainty for a decision-maker.</p> <p>We also have concerns about the potential impact of the tall building zone identified within Hounslow Town Centre, (Treaty Centre) which is identified for a tall building of up to 20 storeys. The Tall Buildings Study 2024 does not appear to have tested the impact of this potential tall building</p>	

Description of matter/s which remains outstanding	LBH comments	RBGK comments (if required)	LBRuT comments (if required)	Agreed next steps
	<p>into account the desirability of sustaining and enhancing the significance of heritage assets. The approach to tall buildings in the Local Plan is part of that strategy, with the potential heights and areas for tall buildings being informed through an understanding of the character of the Borough and the significance of heritage assets, and taking an approach that seeks to add no harm.</p>		<p>on views from Kew Gardens.</p>	
<p>Responses by LBRuT and RBGK raise a lack of clarity in relation to height.</p>	<p>LBH refers to the modifications made in row 2 of the table in Appendix A.</p>	<p>RBGK agrees that this issue remains unresolved and supports further amendments that serve to reconcile the definition of a ‘tall building’ across the Plan as a whole, provided that they are clearly justified by the evidence base.</p> <p>RBGK maintains that the wording in Table CC3.2 must remain “maximum permissible heights” to provide certainty, and that reverting to the wording</p>	<p>There remain concerns that there are contradictory references e.g. shoulder height leading to confusion/misinterpretation.</p> <p>A proposed modification agreed with the Mayor of London in his Statement of Common Ground however introduces a further concern. It proposes a change to the reference in table CC3.2 from ‘maximum permissible’ heights</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>

Description of matter/s which remains outstanding	LBH comments	RBGK comments (if required)	LBRuT comments (if required)	Agreed next steps
		<p>“appropriate” is not supported by the evidence base and could allow taller development to the detriment of the WHS.</p>	<p>to ‘appropriate’ heights. Introducing this additional level of discretion into the policy wording would risk even greater potential harm to Kew. This has been set out in our Statement in relation to Matter 8.</p>	
<p>Responses by LBRuT and RBGK raise concern about early consultation in the planning application process.</p>		<p>RBGK endorses meaningful and transparent engagement by developers with stakeholders early in the pre-application process. It is supportive of further amendments to the wording of relevant policies in the Plan that serve to strengthen and unpack this requirement.</p>	<p>There remain concerns that the suggested modifications will enable developers to complete a ‘tick-box’ notification rather than meaningful engagement and pre-application discussions in relation to potential harm, at an early stage to influence proposals.</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>

Description of matter/s which remains outstanding	LBH comments	RBGK comments (if required)	LBRuT comments (if required)	Agreed next steps
Representation from LBRuT questions how the policy statement at CC3 I, that a tall building will only be acceptable where “in proportion to its location and setting”, aligns with the acceptability of Metropolitan scale tall buildings	In some locations metropolitan scale buildings are proportionate to location and setting (ie. wayfinding, transport nodes, opportunity areas etc).		There are no additional details to clarify these locations and how these could be considered in proportion to location and setting.	The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.
Representation from LBRuT states CC3 IV. suddenly refers to grouping inter-changeably with ‘cluster’ and that it might be better to keep consistent terminology.	Change is not considered necessary for the soundness of the Plan.		Noted this does not relate to soundness, however consistent terminology would make the policy approach clear for the decision-maker. There remain concerns about the approach to clusters.	The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.

Description of matter/s which remains outstanding	LBH comments	RBGK comments (if required)	LBRuT comments (if required)	Agreed next steps
<p>Representations from LBRuT and RBGK states that the GWC masterplan does not represent an up to date position on which to base policy and does not reflect important appeal decision and court judgements, including Chiswick Curve Scheme.</p>	<p>It has been updated where necessary and where appeal decisions are relevant. It clearly deals with the Curve. The Design and Heritage (EBCC1) background paper details the conformity of the methodology in the GWC Masterplan with other documents such as the London Plan and HE Good Practice Advice in Planning 3.</p>	<p>RBGK notes the addition of the Design and Heritage background paper (June 2025) to the evidence base but does not believe this provides the necessary reassurances that all relevant views from Kew Gardens have been considered. Refer to RBGK’s Written Statement for further detail.</p>	<p>Production of the evidence base (published 2020) does not reference the appeal decision (March 2020). It is not considered appropriate to deal with further evidence through appendices to one SoCG, and there remain concerns that there is not an up to date evidence and there are inconsistencies between them, and with the policy approach.</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>
<p>LBRuT and RBGK representations state that it is not clear how the Great West Corridor Masterplan evidence has informed policy and appears to be directly contradictory, referring to the approach to mid-rise buildings in the GWC Masterplan, which contradicts the criteria in CC3, and the Tall Buildings</p>	<p>The references to mid-rise in the GWC are referring to mid-rise in the specific context of the GWC, which is an opportunity area. The GWC masterplan refers to mid-rise as smaller tall buildings. As defined on Page 134 of the GWC masterplan establishes a tall buildings framework to guide tall buildings in the corridor, into 3 groups Focal Buildings, Midrise Building Clusters and Local Landmarks. Therefore, the masterplan approach is to promote clusters of buildings that are moderately tall, not very tall.</p>	<p>RBGK agrees that this issue remains unresolved and supports further amendments that serve to reconcile the definition of a ‘tall building’ across the Plan as a whole, provided that they are clearly justified by the evidence base.</p>	<p>There remains strong concern that the evidence and policy are contradictory, and the further LBH explanation adds further concern that the two different approaches cannot be reconciled. The differing terminology in relation to height</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>

Description of matter/s which remains outstanding	LBH comments	RBGK comments (if required)	LBRuT comments (if required)	Agreed next steps
Study which takes a contextual approach.			results in policies that are not justified or deliverable.	
RBGK's representation states that the Brentford Town Centre area is assessed for Tall Buildings in the Tall Buildings Study, but that it appears no views from within Kew Gardens have been used to test the appropriateness for Tall Buildings and as such the evidence base has not properly assessed the impacts of tall buildings in Brentford Town Centre on Kew Gardens.	LB Hounslow's consultants Urban Initiatives who undertook the Tall Building's Study have advised that views from Kew Gardens were considered but nothing will be visible from any of the locations identified in the Royal Botanic Gardens Kew WHS Management Plan. Brentford Views 1 and 2 test the impacts on views from Kew Bridge and the Thames Path. An explanatory note regarding the tall building on 2-10 London Road is appended to the signed SoCG with the GLA (EX5e), explaining the above.	RBGK notes the explanation in the referenced SoCG but without understanding which view points were assessed (all the views referenced on page 127-130 of the RBGK WHS Management Plan should have been considered) and why they were discounted, RBGK considers that this issue remains unresolved.	There is no evidence in the published study to confirm how this has been tested. It is not considered appropriate to deal with further evidence through appendices to one SoCG, and the note does not resolve the previously highlighted deficiencies with the evidence.	The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.
LBRuT's response raises concerns that the spatial strategy for the GWC is undermined and contradicted by Policy CC4 and the provisions for tall buildings in the GWC and with a number of site allocations close to the borough boundary. This reiterates the need for a policy framework which addresses	LB Hounslow consider that the policy changes suggested address key concerns raised.		We continue to have concerns about the GWC masterplan and how it has informed the approach to site allocations and tall buildings in the Great West Corridor in relation to potential harm to RBG Kew.	The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.

<b>Description of matter/s which remains outstanding</b>	<b>LBH comments</b>	<b>RBGK comments (if required)</b>	<b>LBRuT comments (if required)</b>	<b>Agreed next steps</b>
their concerns raised and ensure liaison on any major development proposals.				