

**LB Hounslow Local Plan Examination**

**Examination documents subject to the follow-up hearing session**

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

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## **1. Introduction**

- 1.1 The Royal Botanic Gardens, Kew (RBGK) welcomes the opportunity to provide a statement in response to the Examination documents published following the Stage 1 Hearings of the London Borough of Hounslow (LBH) Local Plan Review Examination in Public, including EX56 (Tall Buildings and Heritage Note) and the consolidated schedule of proposed Main Modifications.
- 1.2 RBGK is a UNESCO World Heritage Site (WHS) of exceptional international significance. Its Outstanding Universal Value (OUV), and the contribution made by its setting, including views to and from the site, require a high level of protection through the planning system.
- 1.3 RBGK has engaged throughout the preparation of the Local Plan and the Examination process, including through Statements of Common Ground with LBH and the London Borough of Richmond upon Thames (LBRuT), and participation in the Stage 1 hearings via a Written Statement.
- 1.4 This Statement relates to the Examination documents published following Stage 1 and the proposed Main Modifications to policies CC3 (Tall Buildings) and CC4 (Heritage), and associated supporting text, figures and maps.

## **2. Response to Examination Documents and Proposed Modifications**

- 2.1 RBGK broadly supports the proposed modifications, which collectively represent a positive strengthening of the Plan's approach to the protection of the WHS and its OUV.
- 2.2 In particular, RBGK welcomes the amendments to policy wording which more clearly align with national policy in the NPPF, including the emphasis on conserving and enhancing the significance of heritage assets. This provides greater clarity and consistency in the assessment of impacts on the WHS.
- 2.3 RBGK also supports the clarification of the spatial approach to tall buildings, including the revised mapping which distinguishes between lower and higher scale areas where the definition of a 'tall building' differs, and confirms the prevailing height context across the majority of the borough.
- 2.4 The introduction of strengthened requirements for Heritage Impact Assessments, including alignment with ICOMOS guidance, alongside enhanced requirements for visual impact assessment, is also supported. These measures are critical to ensuring that the potential

effects of development on the WHS, including its setting and key views, are properly understood and assessed.

- 2.5 RBGK welcomes the inclusion of new mapping and supporting material, including the identification of constraints to tall buildings and sensitive local views, including those from within Kew Gardens. The explicit recognition of the WHS, its Buffer Zone and associated views within these figures represents an important enhancement to the Plan's evidence base and policy framework.
- 2.6 Further, the additional supporting text to Policy CC4, including references to the attributes of OUV, the role of the Buffer Zone, and the requirement for meaningful engagement with RBGK, is welcomed and RBGK hopes this will assist in ensuring a robust and consistent approach to decision-making.
- 2.7 Taken together, these modifications respond positively to matters raised by RBGK and others during the Examination and provide a more effective framework for managing development affecting the WHS and its setting.

### **3. Conclusion**

- 3.1 RBGK considers that the proposed Main Modifications represent a positive step in strengthening the protection afforded to the WHS within the Local Plan.
- 3.2 Some matters detailed in the SOCG and RBGK's Written Statement to the first stage of hearings remain outstanding and RBGK regrets that the evidence base has not been updated to test the potential harm of development on the additional identified views from within Kew Gardens. However, the enhanced policy wording, additional safeguards and emphasis on assessment of impacts and views proposed in modifications to the Plan are anticipated to help to address these concerns.
- 3.3 RBGK emphasises the importance of these modifications being carried forward into the final adopted version of the Plan in full, to ensure that the most appropriate and effective protection is secured for the WHS and its OUV.