

Hounslow Local Plan Review - Examination Stage 2

London Borough of Richmond upon Thames's Hearing Statement in response to EX56 Tall Buildings – 20 April 2026

Testing of potential tall buildings' impact on views

Our concern remains that the evidence base documents – the GWC Masterplan, the Tall Buildings Study and the Design and Heritage background paper (EBCC1) which are used to justify the approach to tall buildings zones and the potentially acceptable heights in Table CC 3.2 has not adequately tested the impacts of these potential tall buildings locations on the important views, particularly from Kew Gardens, using an appropriate methodology, and continues to not take account of the Chiswick Curve appeal. It is not apparent that any revision/addendum to the GWC Masterplan or Tall Buildings Study or additional testing has been undertaken to remedy our concerns. LBRuT's has consistently set out its position that the approach to tall building zones cannot be supported until the evidence base is amended/updated, with these views tested both during summer and winter. This is set out in more detail at paragraphs 4.3.5 to 4.3.6 of our Statement of Common Ground (EX5i), and row two of the table in Appendix B Outstanding Matters:

“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 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.”

Figure CC4.1 Local Views

Whilst a map of local views in principle would assist decision makers in identifying the most important views to test development proposals against, this map is deficient in a number of aspects:

1. The map is missing the view facing west to northeast from the mound/gazebo within Queens Garden (Kew Palace) set out by LBRuT during the site visit with the examiners on Friday 30 January. It is close to the location marked 8 on the map provided by LB Hounslow to assist with the site visit is appended for reference.
2. Furthermore, the map is at too low a resolution to identify the exact locations.

3. Linear views are identified as a single location, when they are experienced kinetically, as set out in the supporting text. The map should be amended to show the linear nature of the views.

Furthermore, given that the local views identified are not exhaustive, we are concerned that the proposed amended part BB to policy CC4 Heritage which reads “Consider local views when developing development proposals and conserve and enhance local views identified in Map CC 4.1”. This wording should be amended to include additional text as follows:

“Local Views

BB. Consider local views when developing development proposals and conserve and enhance local views identified in Map CC 4.1 and any other relevant local views identified by the Council in consultation with Royal Botanic Gardens Kew and London Borough of Richmond upon Thames.”

Figure CC 3.4 Constraints to Tall buildings

It appears that in one area identified as having constraints to tall buildings in proposed Figure CC 3.4, (where tall buildings would be inappropriate), this overlaps with a site identified as potentially suitable for a tall building in Figure CC 3.3. See for example parts of the tall building location WM1 which is covered by part of the Conservation Area. This conflict between the two maps may mean the policy is ineffective relating to development in this area, and could be remedied by removing the part of the site within the Conservation Area from the tall building zone.