

Danalee Edmund  
Spatial Planning and Infrastructure,  
Housing, Planning and Communities,  
Orange Zone, Civic Centre,  
London Borough of Hounslow.

12<sup>th</sup> April 2019

Dear Danalee,

Great West Corridor Masterplan and Tall Buildings Study

Thank you for presenting the draft Great West Corridor Masterplan on the 19<sup>th</sup> March 2019. I am writing on behalf of the Royal Botanic Gardens, Kew to provide our comments on the presentation and discussions held during the meeting.

We have a number of key areas of concern, which can be summarised as follows:

- Assumptions that form the basis for having tall buildings - as set out in our comments below on the masterplan and associated documents - do not provide a robust and clear rationale for why the corridor needs Tall Buildings.
- Focus is on key views rather than the setting and significance of heritage assets - your assessment methodology has not looked at impacts on the setting and significance of assets, nor has it looked at the OUV of the WHS. There is no clear linkage between the assessment presented and the significance and setting of assets affected. This is a weakness that affects your judgements on “acceptability”.
- There is a lack of appropriate levels of assessment on impact on significance, setting and OUV of WHS – as previously commented, our view is that a robust HIA (undertaken in accordance with ICOMOS guidance) is required to support your documentation. As it stands you have insufficient evidence to support your conclusions regarding acceptability and impacts.
- Inclusion of Citadel and Citroen as baseline in modelling – our comments below on the documents make it clear that we do not believe that the Citadel and Citroen should have been included in the baseline. One is an unconsented scheme the other is an elderly consent on a site that if bought forward now would face very considerable obstacles to approval for a tall building. We would urge you to reconsider this position. Just because the Citadel has consent does not mean that the site is suitable for a different tall building.



- Promotion of three focal tall building locations that have the potential to harm the setting and OUV of WHS – as set out below, we have concerns regarding FB 5, 6 and 7. These all have the potential to harm the setting of the WHS.

The following provides more detail comments on the three documents. The lack of paragraph numbers has made referencing comments difficult and we have included quotes, page numbers and headings to support cross-referencing.

## **Great West Corridor Local Plan Review (GWCP) Regulation 19 Consultation Draft**

### ***Setting the scene***

Fails to make mention of the wider heritage and environmental context for the corridor – a context that is critical to shaping it. Suggest this should be amended.

***Strategic Objective 14:*** *To ensure that high quality new development both integrates, respects and enhances the area’s natural environment and built heritage*

This is weak and fails to define what it means by “area”, suggest it is amended slightly as follows:

**Strategic Objective 14:** To ensure that high quality new development is integrated with, respects and enhances the natural and historic environment within and around the corridor; on both sides of the Thames.

### **Page 26**

Unnecessarily restricts consideration of issues to the “borough” – this is problematic given the number of heritage assets outside of the borough that may be affected. Text currently reads:

#### ***We will achieve this by:***

*a) Concentrating new dwellings in areas with the most capacity to accommodate growth, taking into account highly accessible locations, local character and protection of the borough’s physical, natural and historic environment.*

This needs to extend beyond the borough – suggested minor wording change as follows:

#### **We will achieve this by:**

- a) Concentrating new dwellings in areas with the most capacity to accommodate growth, taking into account highly accessible locations, local character and protection of the physical, natural and historic environment within and outside of the borough.

### **Page 39**

*2. Although there are no Conservation Areas wholly within the Great West Corridor itself, the Grand Union Canal and Boston Manor, St Paul’s, Gunnersbury, Kew Bridge and Osterley Conservations Areas are all partially within it and there are many others in close proximity. The World Heritage Site of Royal Botanic Gardens, Kew, which includes Grade I and II Listed Buildings and Scheduled Monuments, is located over the River Thames, a short distance from the corridor. The Great West Corridor also sits in the backdrop of these*

sensitive views. Therefore, new developments, especially of taller buildings, will need to have due regard to their impacts on nearby heritage assets and their settings.

Final sentence is weak. Due regard underplays the statutory and policy requirement. Suggest amendment of final sentence as follows:

“Therefore, new developments, especially of taller buildings, will need to avoid additional harm to the significance of heritage assets and their settings, particularly assets of the highest value.”

## Page 40

### **Our Approach**

*The Council will create a strong sense of place and identity for the Great West Corridor, through a strong urban design-led approach which seeks to knit the Great West Corridor well, into its surroundings, whilst protecting and enhancing heritage assets within and adjacent to the Corridor and creating a memorable journey for those visiting, living and working within it.*

“Adjacent” implies next to, and limits appreciation of the wider issues. Suggest minor change as follows:

“...whilst protecting and enhancing heritage assets within the Corridor and in the wider area around it, and also creating a memorable journey for those visiting, living and working within the Corridor.”

### **We will achieve this by:**

- b) *Making best use of redevelopment opportunities whilst respecting and enhancing the area’s distinctive character and historic environment.*

What is meant by area? This needs some form of definition

Also, suggest an additional point under the “**We will achieve this by**” heading stating that:

x) Ensuring that schemes are only consented if they avoid any further harm to the setting and significance of the Royal Botanic gardens, Kew WHS and other high value designated heritage assets in the Corridor and wider area around it

### **The Council will expect development proposals to:**

We would suggest an additional point under this heading stating that:

x) design schemes that avoid any further harm to the setting and significance of the Royal Botanic Gardens, Kew WHS and other high value designated heritage assets in the Corridor and wider area around it

## Page 41

*Ill. has had full regard to the significance of designated and nondesignated heritage assets including the setting of, and views to and from, such assets, has no unacceptable harmful impacts, and should comply with Historic England guidance on tall buildings;*

“unacceptable harmful impacts” is an entirely subjective phrase. All developers will insist their schemes do not have “unacceptable” impacts. Greater clarity is needed in this section. Suggest returning to NPPF terminology around “clear and convincing justification for any harm” “great weight for conservation and greater weight for assets of higher significance” etc.

We do not agree with the wording in its current form.

*ix) comprehensively design to ensure that tall buildings in clusters are not all built to the same height but create a variety of heights to support a lively skyline;*

Need additional clarification to indicate that this variety should not be sought by seeking additional height, but rather through the moderation of height

#### **Page 42**

We expect that HE will comment in detail but this does not appropriately address heritage legislation, policy and guidance and needs substantial rewriting. It is selective in its presentation of elements of NPPF (missing for example the need for clear and convincing justification for any harm) and fails to mention any London Plan (draft or existing) policies on heritage and World Heritage. Also fails to mention the 2012 SPG on the setting of WHSs in London and the Royal Botanic Gardens, Kew WHS management plan.

#### **Page 45**

We disagree with the map showing a very small number of “sensitive views” as this implies everything else (not shown) is not sensitive. We would suggest that all such views are removed and instead the assets are shown. Views are just one element of setting.

#### **Monitoring**

This is limited in relation to design and heritage matters.

Suggest measures around active monitoring of change in the setting of heritage assets though regular monitoring of views and elements of setting, to identify changes and ensure critical thresholds are not breached due to cumulative harm.

### **Great West Corridor Masterplan and Capacity Study**

#### **Page 36**

*Kew is a planned landscape of international importance recognised by its status as a World Heritage Site (WHS) and as a Conservation Area. It contains Listed Buildings (Grade I, Grade II\* and Grade II) and Scheduled Monuments. The impact of any development (especially of tall buildings) on the WHS and on views in and out of it must be carefully considered.*

This should be amended as follows:

*The Royal Botanic Gardens, Kew is a designed landscape of international importance recognised by its status as a World Heritage Site (WHS), Grade I Registered Park and as a Conservation Area. Its many Listed Buildings (Grade I, Grade II\* and Grade II) and two*

Scheduled Monuments also contribute to its international value. Existing and permitted development has already harmed the asset and further development (especially of tall buildings) must avoid negative impacts on the setting of the WHS, including views in and out of it.

**Page 38 – caption**

*View of Kew Palace from Kew Gardens with the Urban Villa tower in the Great West Corridor forming an uncomfortable backdrop.*

Suggest change to:

*View of Kew Palace from within Kew Gardens with the Urban Villa tower in the Great West Corridor clearly degrading the setting of both the Palace and the WHS.*

(please note that the Urban Villa tower is referred to as the Kew Eye building in other documents you have presented).

**Page 39**

This sentence illustrates one of the main issues:

*“The setting of landscapes within Kew Gardens, Osterley Park, Chiswick Park and Gunnersbury Park are sensitive to change and key views into and out of these registered sites may be affected by development along the GWC.”*

The focus is on “key views”. This is not the primary issue for RBGK, the primary issue (in relation to the GWC) for RBGK relates to the visual intrusion of development over the tree screen and boundary features around the Gardens (as recognised in the masterplan document). This form of intrusion has a direct impact on the setting and OUV of the WHS. The harm can be further exaggerated when this intrusion occurs within, or in proximity to a key designed view into / out of the landscape or of / from a key building in that landscape – but the potential harm is not limited to these cases. The document’s continued focus on “key views” is unhelpful and inaccurate.

**Page 39**

This sentence is incorrect:

*Registered parks and gardens are a material planning consideration and any development which would harm to their setting would have to be balanced against public benefit.*

The scale of harm is important. As set out in NPPF if substantial harm was to occur then “exceptional” or “wholly exceptional” circumstances would be required. In addition, any harm regardless of level, requires clear and convincing justification – that justification should not be rooted in the public benefits associated with the scheme and needs to relate to aspects such as location, need for height etc.

**Page 39**

*A small number of existing developments, such as the Brentford Towers and the Kew Eye, are visible from within the registered parks and Kew Gardens WHS and detract from their setting. These developments do not set a precedent for future tall building development but instead highlight the sensitivity of these important heritage assets.*

Suggest adding following sentence to end of paragraph:

*“Any likely additional harm to the setting and significance of the assets caused by new development needs to be addressed cumulatively with the existing levels of harm.”*

### **Section 2.4.2**

See previous comments regarding over reliance on “key views” and a failure to address the “setting” and “significance” of assets in the round. The approach taken by the document runs the risk of perpetuating the myth that new development will not harm the setting and significance of the WHS (or other designated asset) if it lies away from key views. This needs to be addressed. Setting is a broad concept (see NPPF definition and HE guidance).

All the masterplan has done is test proposals against a limited number of representative viewpoints from within and towards a number of assets. It has not assessed potential impacts on the setting and significance of the assets, nor has it presented a robust and appropriate assessment of impact on the OUV of the WHS. As previously commented the masterplan requires a HIA to be undertaken in accordance with 2011 ICOMOS guidance. The current assessment does not provide sufficient information with regard to the WHS, in particular.

We have serious concerns about the over reliance on a limited number of key fixed views, without appropriate supporting assessment.

### **Section 3.1**

No mention of policies in the Local Plan or current London Plan relating to the conservation and protection of heritage assets.

Policies are mentioned in draft London Plan, which is welcomed. We are surprised however that there is no national policy context.

### **Page 41**

The view at the end of Syon Vista (BG10) is also very sensitive. We suggest adding a red ‘significant view’ line out from this view across Isleworth, especially as it aligns with the area of significant growth in Hounslow town centre shown in Figure 3.2 on page 63.

### **Page 70**

Delighted to see that Brentford FC have been promoted to the Premier League.

### **Page 96**

*The Brentford Community Stadium, a new 17,250-visitor football and rugby stadium, is currently being built in the railway triangle at Lionel Road. Associated residential development is expected to deliver over 1,000 homes on sites surrounding the stadium in a series of mid-rise and taller buildings. Complementing retail and community uses will also be delivered.*

Should “taller” not just be “tall” – the proposals include tall buildings as per your definitions?

## Page 96

*The stadium development will completely redefine this area. It introduces a completely new scale of development that will drive similar development proposals on surrounding sites. It has laid the foundations for the development of an exciting new mixed use quarter with an urban character.*

This paragraph reads as if it is justifying tall buildings in this location – a balance is needed in text.

## Page 101 & 139

Illustrative Masterplan – East Area

We would like to see guidance for a new configuration on the Vantage West site should it come up for development in the time frame of this plan (even if only as an option). This presents a significant opportunity to bring benefit to the Kew WHS by ensuring that a new development on this site is not visible along Pagoda Vista (as the Vantage building is currently).

## Page 116-117.

7.3.2. Rail improvements.

Kew Bridge Station should be made accessible with lift access to both platforms and the platform themselves raised with a greater area under cover. Kew Bridge Station was recently turned down for DfT funding for access improvements, so this remains an issue and should be an objective of this plan alongside the others set out.

## Page 130

### Section 7.7.1

*The Great West Corridor is designated as an Opportunity Area in the Draft London Plan and must deliver a significant quantum of new development in the area to support London's growing economy and provide much needed housing. It is clear from other Opportunity Areas in London, as well as from developer interest, that tall buildings are expected to play a role in the development of this area.*

This is not a strong rationale for tall buildings. Developer pressure and “what has been done elsewhere” does not create a need. It does not reflect the highly sensitive nature of the area (compared to other Opportunity Areas). We suggest that further consideration is given to the justification for tall buildings.

*Historic England and the Royal Botanic Gardens Kew have voiced significant concerns about tall buildings in the study area that could potentially bring substantial harm to the setting and significance of heritage assets in the area and may have an adverse impact on the World Heritage Site by compromising a viewer's ability to appreciate its outstanding universal values and affect the significance of this unique heritage asset.*

This paragraph has errors relating to terminology etc suggest following minor changes:

*Historic England and the Royal Botanic Gardens, Kew have voiced significant concerns about tall buildings in the study area as they could potentially cause substantial harm to the setting and significance of heritage assets in the area and may have a substantial cumulative (with existing and proposed development) adverse impact on the Outstanding*

Universal Value of the World Heritage Site. These are significant international and national statutory and policy concerns.

We disagree that the guidance provides sufficient evidence to meet the claims on page 130 about “*what is appropriate and acceptable in terms of tall buildings*” and “*This approach will ensure that tall buildings are located in the right places and at the correct scale to ensure the integration with the character of proposed quarters, the surrounding context and the protection of heritage assets*”

The approach has not assessed impact on the setting and hence significance of assets and provides no evidence in this regard. It has merely looked at representative views.

### **7.7.3**

Welcome logic of approach and clear emphasis on sense of enclosure at Kew etc.  
Welcome emphasis on mid-rise buildings.

### **7.7.4**

We have significant reservations about the approach used as no evidence has been presented in relation to the following key stages:

- a) *Understand significance of heritage assets and their sensitivity to tall buildings;*
- or
- d) *Evaluate impact of potential tall building height scenarios on the significance of heritage assets and their settings, considering the individual and cumulative effect of tall building proposals;*

You have not evaluated impacts on significance (through change to setting). You have evaluated impacts on views – these are very different things.

We also have very significant reservations regarding the inclusion of the Citadel and Citroen (as set out above) – we believe these have driven the need for increased building heights in the area.

### **7.7.5**

#### **Focal Buildings**

We have significant reservations regarding the need for so many further tall ‘focal buildings’ on the corridor, particularly FBs 5, 6 and 7. There are already focal buildings on the corridor with Gillette at the west end and the listed Wallis House in the centre.

FB7 in the proposed form will harm the setting and significance of the Grade I listed Orangery and WHS (both assets of the highest significance). Although there is a permission this should not in our view be encouraged as a location. Our view is that it should not be included and if the current consent is not implemented then there are strong grounds for refusal of a future tall building on this site given the statutory requirement to safeguard the setting of the Orangery (s66) and the international obligation and national policy requirements to safeguard the setting of the WHS.

FB5 and FB6 present similar risks with over topping and we would wish to see building heights lowered with a greater emphasis on design being used to create a focal point rather than height.

#### 7.7.6

*From this, it established an appropriate height for each tested location that is deemed acceptable in respect of the individual and cumulative impact on heritage assets in the context of the comprehensive development and regeneration of the Great West Corridor.*

We disagree that the evidence presented supports the “acceptability” of the proposed heights. The methodology is too limited to deliver that outcome.

We would wish to see the following text in this section given greater prominence and weight:

*Notwithstanding this guidance, any proposed tall building will need to be tested in respect of its individual and cumulative impact on heritage assets, views, townscape and character. This is necessary as the height, bulk, massing, form, architecture and materiality of a tall building all can affect its impact on heritage and other assets in both positive or negative ways. Sensitive views identified in this document are only a sample of representative views and other views may need to be tested. Tall building proposals need to take full account of relevant heritage legislation, guidance and requirements, including the Kew Gardens WHS Management Plan.*

#### **Great West Corridor Appendix: View Assessment**

No comments on the verified photography and 3d modelling method.

#### **Page 30, view assessment approach**

The methodology employed has not looked at the impact tall buildings could have on the significance of heritage assets through change to their settings - it has looked at the impact of the proposals on a number of views which express some aspects of the setting of some of the assets.

As indicated in previous comments, the assessment methodology should have been rooted in the setting and significance of assets (in the round) and in terms of the WHS it should have been supported by a HIA undertaken in accordance with ICOMOS guidance. You have only assessed impacts on views.

We fundamentally disagree to your approach of only looking to avoid substantial harm (p30 - column 4) this is too high a bar. Substantial harm is very rare. Your text is also confused as it goes on to talk about avoiding harm. Please review, revise and clarify.

#### **Page 31**

##### **Point 3d**

*“Evaluate impact of potential tall building height scenarios on the significance of heritage assets and their settings, considering the individual and cumulative effect of tall building proposals;”*

This has not been done - the methodology has not tested impacts against the significance of each asset.

#### **Point E and Point 4**

You discuss which tall buildings are "*deemed appropriate*", what criteria were used to identify appropriateness?

#### **Page 33**

We also note there is not impact assessment matrix for the "appropriate height" scenario. Can this be supplied?

#### **Page 34**

Your view assessment criteria have a number of issues:

- Is not clear if the impact is on significance or setting? If the former you have not provided any evidence of what the significance of an asset is and how its setting contributes to that; if latter you have not described the setting of the asset in the round. Suggest instead you describe it as " impact on the identified view - which is taken to be a representative view of aspects of the site's setting and provides an indication of likely impacts on setting and significance."
- major detrimental = substantial harm, which is surely unacceptable. How does this differ from the final category 'Substantial unacceptable harm'?

#### **Page 34**

Chiswick Curve Site - as discussed above we disagree with the inclusion of tall building proposals on this site (see previous comments above).

We were expecting options with and without the Citadel.

Citroen – We disagree that it should be included as it does not have consent. We would have preferred to see scenarios with and without this development.

Additionally, there is not enough detail on alternatives – and you have not modelling the proposals in the final sentence "*If the Citroen site is not be permitted, appropriate heights on this site should be no higher than the development of the Fountain Leisure site to err on the side of caution*"

#### **Page 41**

*Despite the existing intrusion of the Brentford Towers and the Kew Eye tower, there is otherwise no major built intrusion into the setting of the Botanic Gardens.*

We disagree – there is also the BSI, Vantage West, the waterside scheme in front of Brentford Towers etc.

#### **Comments on Views**

General comment - you do not mention relevant heritage assets for RBGK e.g. when looking at Kew Palace, you do not include Kew Palace designation (Grade I listed and Scheduled monument) in the list of assets?

## **BG2**

Where is this view identified in the WHS Management Plan?

Significance of view

Text is incorrect - Kew Palace did not have this designed landscape setting when it was built.

What do the historical associations have to do with this view?

The "small house" is connected to Kew Palace and once formed part of its associated service quarter - it is not detrimental it contributes to the complex and the relationship between it and Kew Palace is important.

Impact base height

Baseline is behind permitted (?)- which aspect of permitted? Citroen or Brentford?

## **BG4**

This is an Entrance and an Exit – please amend as views on your way out of the Garden are important too

## **BG5**

Choice of location is interesting as if you come step back a small distance you see the Kew eye which you don't in your chosen view

Significance of view

You state this is one of few unspoilt views in gardens? We disagree, there are many unspoilt views in the gardens, please amend.

Please note this view does not represent how Kew Palace was originally meant to be experienced. This shows a complete lack of understanding of the history and significance of the Palace.

## **BG7**

Need to explain why only half of view modelled

## **BG8**

Difficult to work out where on plan

Why was view chosen?

The significance of the view does not seem to relate to this view? It is not a view over the lake? There are also some incomplete sentences?

What are we referring to with the "Botany House"?

If the significant views are not northwards then why are you modelling this view?

## **BG12**

We note that the proposed heights have been calibrated for this static view point. This is a dynamic view along the vista – would the development appear above the Palm House in other locations on the vista?

**BG14**

Significance of the view

What do you mean by central meadow?

This viewpoint clearly illustrates the issue with including the Citadel. (see earlier comments).

**BG15**

We have concerns about the likely increase in glimpsed views etc.

**BG16**

This is the Grass Garden not the Dukes Garden and this view is not in WHS Management Plan. As referenced at the start of this section, we would like to see the relevant heritage assets acknowledged (Grade II listing of Cambridge Cottage in this instance).

You have new development poking over top of Cambridge Cottage. There is likely to be significant additional visible development as you move around the area.

Finally, we would like to thank you for continuing to engage us in the development of the GWC Local Plan review and Tall Buildings Study. Kew welcomes and commends the work Hounslow has undertaken in the process of developing these documents. We look forward to receiving your response to our comments above and are happy to discuss any of the points further if clarity is needed.

Yours sincerely,



Georgina Darroch  
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Royal Botanic Gardens, Kew

cc David English, Historic England  
Katie Parsons, Historic England  
Marc Wolfe-Cowan, London Borough of Richmond upon Thames