

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

24<sup>th</sup> September 2019

Dear Danalee,

Great West Corridor Local Plan Review: Regulation 19 consultation

I am writing on behalf of the Royal Botanic Gardens, Kew (RBG Kew) to provide our comments in response to the current “Regulation 19” consultation.

As you are aware, we made representations to the Inspector at the Local Plan inquiry in 2015 concerning what we considered to be an inadequate policies and framework for the assessment of proposals for tall buildings in Brentford seen in relation to RBG Kew World Heritage Site (WHS).

We welcomed the Local Plan Review therefore, and we appreciate the effort that your team has made on the Great West Corridor Masterplan and View Assessment, and for meeting with us during the preparation of the plan.

We have previously given our comments on the Great West Corridor Local Plan Review, Great West Corridor Masterplan Capacity Study, and Great West Corridor Appendix: View Assessment. These are set out in our letter of 12<sup>th</sup> April 2019.

You have subsequently responded with a table setting out your proposed amendments in response to our comments: whether the policy is amended in whole or in part, whether our suggested alternative wording is incorporated, or simply noted.

In many cases our comments have been incorporated. However, there are a number of areas where the policy is unchanged, particularly concerning the inclusion of so-called “focal buildings” at various sites along the corridor; the inclusion of the Citadel and Citroen schemes, and assessment methodology used in relation to significance.

We stand by our comments where these have not incorporated and would hope to discuss these further with the Inspector in due course. We have a number of further comments at this time, principally relating to policies GWC5 and P3 as follows.



## Great West Corridor Local Plan Review

### Policy GWC5: Design and Heritage

GWC5 h) III refers to “focal buildings” 61-82 metres at sites including Capital Interchange Way and Chiswick Roundabout. It is clear from the viewshed analysis in the View Assessment that buildings rising to 82 meters on these sites would be harmful when seen from RBG Kew.

This policy is also at variance with map 4.9 on page 73 and with policy P3 which only indicates buildings at “60m+” at the Golden Mile Station Quarter and London Gateway.

This policy is contrary to the following paragraph i) that seeks to “... avoid further harm to the setting, views, significance, Outstanding Universal Value, and Buffer Zone of the Royal Botanic Gardens, Kew WHS and other designated heritage assets...”

Policy GWC5 and supporting paragraphs do not refer to RBG Kew’s World Heritage Site Management Plan and could usefully include reference to this, possibly to be included within i).

Paragraph 4.63. We support the requirement that: “Applicants ensure that the design of schemes avoids any further harm to the setting, views including winter views, significant, Outstanding Universal Value, and Buffer Zone of Kew WHS (by siting development on or below the tree/building line)”. This paragraph could be clarified and strengthened by removal of the brackets. We also suggest that this paragraph should be moved to Policy GWC5 itself.

Related to Paragraph 4.63, it is clear from the Great West Corridor Masterplan (see for example the Heights Framework at 7.6 and Figure 7.14 on page 132) that, due to a combination of tree screening and distance, substantial buildings can be built along the Great West Road that have no impact on RBG Kew. In other words, the presence of RBG Kew is no impediment to development in the Great West Road Corridor provided buildings are sited behind the tree line.

Tall “focal” buildings that appear above the tree line and are visible from within RBG Kew have the potential to cause significant harm to the setting of RBG, Kew and its important status as a World Heritage Site. Due to the presence of existing harm to the WHS from visible tall buildings, further tall building applications have the potential for increased cumulative harm above each individual effect. The presence of existing consented buildings in the backdrop of key views should not be a justification for new tall buildings adjacent due to the cumulative harm that would result.

In paragraph 4.63 it would be helpful to illustrate what “further harm” to the setting of Kew actually means e.g. by including photographs of the so-called “Kew Eye”, such as that on page 38 of the Great West Corridor Masterplan.

### Policy P3 Great West Corridor East

P3 (m) III. This policy refers to “focal” buildings of 61m outside Lionel Road Station and at the B&Q site, 66m at Capital Interchange Way, and 70m at Chiswick Roundabout.

As you know, there is an application currently before the Secretary of State for the Citroen site at Capital Interchange Way which rises to 66m. We have objected to this scheme and intend to make further representations. A similar proposal at 1-4 Capital Interchange Way is only slightly further way but is not visible from RBG Kew and thus is not an issue for us.

This part of the Great West Corridor is close to RBG Kew and thus of greater sensitivity both to RBG Kew and its setting, in particular Kew Green which is part of the WHS buffer zone. We are most concerned therefore that a “focal” building of this height is envisaged here by this policy and would ask that the height is reduced.

P3 (m) III is also at variance with the “Tall Buildings Approach” at 7.7.3 of the Great West Corridor Masterplan which specifically shows the harm that tall buildings on a site in Capital Interchange Way would cause. The harmful effect of new buildings here on the setting of the Grade I listed Orangery is a point of departure from the Great West Corridor Masterplan to promote mid-rise buildings generally along the Corridor.

## **Great West Corridor Masterplan and View Assessment**

Please refer to the comments made in our letter of 12<sup>th</sup> April 2019. Further comments are set out below.

### 2.4 Heritage

#### 2.4.2 Heritage Views.

Page 40. The final paragraph should refer to the “RBG Kew World Heritage Site Management Plan”.

### 7.6. Heights Framework: General Building Height

7.6.2. Approach to General height. We are broadly supportive of the approach outlined for mid-rise buildings that would generally not be visible from RBG Kew, due to a combination of tree screening and distance. It is noted however that the heights indicated on Figure 7.13 appear to be at variance with sections shown on Figures 7.10-7.12 and referred to at 7.6.3. For example, 7.12 shows a building of 12 storeys immediately adjacent to a street.

### 7.7 Heights Framework: tall buildings

7.7.2 Sensitivities. “*Significant international and national statutory and policy concerns*” include the UK’s obligations under international treaty.

#### 7.7.3 Tall buildings approach.

We support the approach set out in this section, i.e. to reduce the impact on heritage and landscape setting by promoting mid-rise buildings rather than very tall buildings as illustrated by Figure 7.14 showing the Orangery.

However, the approach set out in 7.7.3 to promote mid-rise building is at variance with Policy GWC5 and Policy P3 which envisage tall buildings including a 66m tower on the site at Capital Interchange Way behind the Orangery shown in Figure 7.14.

The description of the experience of RBG Kew and in particular “... *a strong sense of enclosure and separation, of being ‘somewhere else’, a sanctuary, designed not to see the outside world*” is well put and aligns with the description of the experience of RBG Kew in the current draft of the RBG Kew WHS Management Plan. This experience is harmed however by tall “focal” buildings on key sites visible from within the Gardens.

We also support the statement that, *“The intrusion by tall buildings over the top of or next to Grade I and Grade II\* listed buildings would be imposing and extremely harmful”*.

We are concerned that the section in the penultimate paragraph on page 133 concerning the design of tall buildings will serve to legitimise further applications for tall buildings on sensitive sites in the Corridor.

#### 7.7.5 Focal buildings

A focal building need not necessarily be tall, as the example of the listed Wallis House or Gillette UK. See also the comments in our letter of 12<sup>th</sup> April 2019.

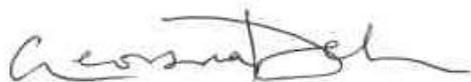
Focal buildings FB1 (West Cross Campus) and FB3 (London Gateway Cluster) are indicated on Figure 7.17 as potentially 60m plus. Whilst further away from RBG Kew, tall buildings here would be seen in the context of the Arcadian Thames, in an area where no tall buildings intrude at the present time. Figure 7.17 indicates a “sensitive linear view” from RBG Kew along Cedar Vista towards this area.

Focal buildings FB4 (Phoenix site) and FB6 (Capital Interchange Way) as “distinct taller buildings” are at variance with the “mid-rise” approach advocated elsewhere. Townscape arguments for focal buildings seen from within the corridor: *“... a focal point at the bend of the M4 east-bound”* (FB4), or *“... providing a central focus to the east cluster”* (FB6) will not be appreciated from RBG Kew, where they are seen as arbitrary intrusions into the designed landscape.

The height stated for FB6 on Figure 7.17 as 50-60m is at variance with the aspiration in Policy GWC5 h) III and P3 (m) III for a taller building on this site.

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

Yours sincerely,



**Georgina Darroch**

World Heritage Site Coordinator

Royal Botanic Gardens, Kew

cc.	David English	Historic England
	Katie Parsons	Historic England
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