

Mr Eamon Cassidy
Planning Department
London Borough of Hounslow
Hounslow House
7 Bath Road
Hounslow TW3 3EB

29th January 2020

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Planning Reference 015787/2/P3

Dear Mr Cassidy,

2 Larch Drive, Chiswick, London W4 5QL

I am writing concerning the above planning application for a mixed-use development in five buildings around a central courtyard, including a technology showcase, retail space, 258 residential units and a 219 bedroom hotel and other facilities.

RBG Kew objects to this application due to the adverse visual impact it will have on key views from the Royal Botanic Gardens, Kew World Heritage Site and the setting of the Grade I listed Orangery.

This would be contrary to Policy CC3 (Tall Buildings) and Policy CC4 (Heritage) of the Hounslow Local Plan 2015-30. In particular Policy CC3 paragraph (c) states that tall buildings should not have “... a significant adverse impact on the setting of, view from and between heritage assets including Royal Botanic Gardens Kew World Heritage Site...”

The London Plan (March 2016) contains similar policies. For example Policy 7.7 E on tall buildings calls for particular consideration of the impact of tall buildings in sensitive locations such as World Heritage Sites.

Similarly, the draft New London Plan has strengthened policies with regard to World Heritage Sites and heritage and should be given significant weight given its “intention to publish” status. Policy HC2 provides reinforced protection for WHS’s stating that “...Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their



attributes.” And that “Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.” Policy D9 states that in terms of addressing the impact of tall buildings “e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it”

In the light of these and other policies, it is disappointing to see from the application documents that the scheme will be visible above the roof line of the Grade I listed Orangery, when viewed from across the Great Lawn from the south west. See for instance View 12 of the applicant’s Townscape and Visual Impact Assessment.

RBG Kew’s World Heritage Site Management Plan (2014) refers to Kew’s “Iconic architectural legacy” as a key attribute of its Outstanding Universal Value. Chambers’ Orangery is an important part of this legacy, both in terms of its original use for the cultivation of plants and as a surviving building of the Royal residency at Kew Gardens. Furthermore, the Orangery is currently experienced in an intact landscape setting with an open lawned foreground (this lawn is a legacy of Chambers’ design for Kew Gardens and the later 19th century adaptation of the landscape) and a defined backdrop of trees and open sky above the roofline of the building. A modern building appearing above the roofline of the Grade I listed Orangery would be a jarring intrusion into its setting.

A further significant concern is the cumulative effect this proposal would have in relation to other existing, consented and proposed tall buildings in the setting of the WHS and also in the setting of the Orangery. The impact of these developments would be greater than the sum of their individual impacts, further increasing the degree of harm to the WHS.

View 12 shows that the proposed development would appear between the residential development associated with Brentford Stadium to the left and the so-called “Citadel” to the right. Seen together with these consented schemes, and taking into account the proposed Citroen development, the proposal would form an almost continuous line of new buildings in the backdrop of the Orangery, very significantly eroding its intended setting. We strenuously disagree therefore with the commentary adjacent to View 12 which states that the Magnitude of Impact seen from this viewpoint would be “Negligible”.

The commentary adjacent to View 12 acknowledges that the visual intrusion seen from this viewpoint “is considered adverse by RBG Kew”, but continues: “This adverse effect would result as a consequence of the cumulative development only, and not the Proposed Development, which would have a negligible effect in isolation and in conjunction with the with the consented schemes”. This commentary is unclear but our view is clear that the scheme would, in its own right, harm the setting of the WHS and the Orangery and that cumulatively with other existing, consented and proposed tall buildings it would have a very significant adverse impact on these assets of the highest significance (as defined in the NPPF).

It is also our view that the ES does not sufficiently address the requirements and methodology set out in the London WHS Settings SPG (2012) or the ICOMOS guidelines (2011) as the applicant has not undertaken a formal HIA. The SPG methodology for assessing impacts was not followed or addressed, nor did they provide sufficient analysis of the contribution made by setting of the WHS to its OUV, nor the contribution that the setting of the Orangery makes to its significance.

In conclusion, we consider that a development on this site at the scale envisaged would cause harm to Outstanding Universal Value of the Royal Botanic Gardens, Kew WHS and the significance of the Grade I listed Orangery. This harm would result from the development in its own right and cumulatively with other existing, consented and proposed tall buildings. Accordingly, we ask that you recommend that this application is refused.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Georgina Darroch', written in a cursive style.

Georgina Darroch,
RBG Kew, World Heritage Site Coordinator

cc Mr Michael Dunn, Historic England