

Royal Botanic Gardens Kew
Conservation and Research Nursery, Wakehurst

Section 73 Application:

Addendum to Heritage Statement

September 2025
Rev: P1

1.0 Introduction

This statement has been prepared by Hugh Broughton Architects on behalf of the Royal Botanic Gardens Kew (RBG Kew). It acts as an addendum to the Heritage Statement prepared by Pick Everard and submitted as part of the consented application ref. DM/22/1774 and forms part of a Section 73 application describing amended proposals. It sets out how these amendments are considered to alter the development's impact on heritage assets from that which was assessed in the consented document.

Pick Everard's assessment of the consented scheme found that the only heritage asset likely to suffer any impact was Wakehurst Farmhouse, which was expected to suffer a "slight adverse" impact due to the proposed development partially obstructing views towards open countryside:

	Heritage Asset	Value of Significance	Severity of Changes	Indicative Impact (beneficial/adverse)
1	Wakehurst Place (Mansion)	Very High	No Change	Neutral
2	The Stables	Very High	No Change	Neutral
3	Registered Park & Garden	Very High	No Change	Neutral
4	Wakehurst Farmhouse	Medium	Moderate Change	Slight Adverse
5	The Bothy, Building A (East Range)	Medium	Minor Change	Neutral/Slight Beneficial
6	Building B (South Range)	Medium	Minor Change	Neutral/Slight Beneficial
7	Building C - Stables (West Range)	Medium	Minor Change	Neutral/Slight Beneficial
8	Building D	Medium	Minor Change	Neutral/Slight Beneficial
9	Building E – Courtyard Garden	Low/Negligible	Moderate Change	Neutral/Slight Beneficial
10	Building F – Greenhouses	Low/Negligible	Major Change	Slight Beneficial
11	Building G	Low/Negligible	Major Change	Slight Beneficial
12	Building H	Low/Negligible	Major Change	Slight Beneficial
13	Building I	Low/Negligible	Major Change	Slight Beneficial
14	Building J	Low Negligible	Major Change	Slight Beneficial
15	Building K	Low/Negligible	Major Change	Slight Beneficial
16	Lunce Gate Lodge	High	No Change	Neutral
17	Newhouse Farmhouse & Model Dairy	High	No Change	Neutral
18	The Oaks	Medium	Negligible Change	Neutral/Slight Beneficial

Table showing assessed impacts on heritage assets from heritage statement forming part of the consented planning application. Refer to page 26 of the consented heritage statement for a map of the letter annotated buildings.

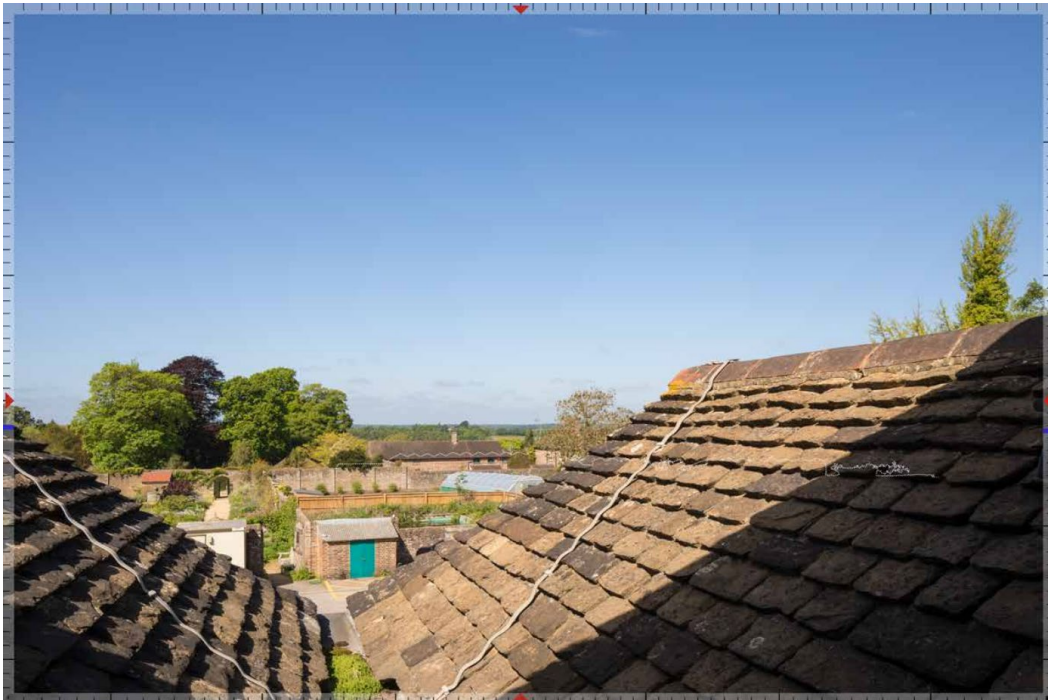
This statement will now re-examine the likely impacts to each of the assets in the context of the design amendments proposed in this Section 73 application.

One of the key tools for Pick Everard's assessment was the Visual Impact Study prepared by Miller Hare: An update to this study has been commissioned to show the amended design proposals and is included with this application.

2.0 Impact of the revised proposals on heritage assets

2.1 Wakehurst Place, the Stables and the Registered Park & Garden (assets 1, 2 & 3)

As was the case for the consented application, the combination of the retained Havelock farm buildings and the site levels resulting in the glasshouses being placed at lower elevations means that little or no part of the development will be seen. This is due to the siting and massing of the buildings being largely unchanged from that in the consented scheme, with some reductions in building lengths/widths being the only significant changes. As such, visual impact study views 5 and 6 (elevated views from The Stables) remain unchanged, with the development expected to be fully obscured from these vantage points.



View 5 from the consented visual impact study demonstrating that the development would not be visible from elevated positions at The Stables, as continues to be the case for the now-proposed amendments

An additional view (labeled HE in the visual impact study) was created to address concerns raised by Historic England as to the impact of the development when viewed from the garden to the south. This view shows how the retention of the existing wall and trees at the site boundary is expected to largely screen the development from view. The nearest end elevation of glasshouse 1 and also the upper part of the timber-clad enclosure around the open-air plant space housing air-source heat pumps are likely to be visible above the wall. Given that the end elevations of the (since demolished) agricultural buildings were previously more prominently visible in this same location, the development's impact is assessed to be a slight benefit here.



View "HE" from the updated visual impact study – prior to development (left) and as now proposed (right)

As was the case for the consented scheme, the oblique angles of views from the mansion itself and its immediate setting towards the application site, combined with the locations of trees and other vegetation, mean that the development is not expected to be visible from here. The assessment therefore remains "Neutral" (no impact) as per the consented scheme.

2.2 Wakehurst Farmhouse

Ongoing consultation with the resident at Wakehurst Farmhouse has helped inform a decision to switch the proposed positions of the polytunnels and shade structure. As it is a taller and more permanent structure, the polytunnels would have had a greater visual impact in their previously proposed location adjacent to Wakehurst Farmhouse than where they are now proposed to be sited alongside the retained Havelock Farm buildings. The shade structure, which comprises lightweight netting hung on a slender metal frame when required (typically only in the summer), is expected to cause less visual harm and has therefore been moved to the site adjacent Wakehurst Farmhouse, resulting in a slight lessening of the impact previously assessed.

Otherwise, the reduction in size of the glasshouses may result in a further marginal lessening of the visual impact on this asset, but in practice the sizes of the openings between buildings which allow views through and out to the landscape remain the same as per the consented scheme so the change in this regard is negligible. The level of visual impact harm to Wakehurst Farmhouse is assessed to be unchanged from the consented scheme at "Slight Adverse".

2.3 Havelock Farm (The Site)

The assessment for this aspect of the heritage setting remains unchanged from that of the consented scheme, with the replacement of the C20th agricultural buildings and associated clutter with the proposed glasshouses and their landscaped setting being considered a slight beneficial change.

2.4 Lunce Gate Lodge, Newhouse Farmhouse & Model Dairy, and The Oaks

Again, the revised proposals are not expected to affect the assessment in regard to these heritage assets. The distant view from Paddockhurst Lane (visual impact study view 1) has not been updated since, at this distance, no change would be observable versus the consented scheme. The closer-in view from the track across the meadow to the west (view 2) has been updated however, and demonstrates that the massing and materiality of the proposed development is very similar to that of the consented scheme.

What is more apparent is that mature trees and hedgerow planting were shown in the consented visual impact study, whereas the updated study now shows the proposed, young multi-stem ("feathered") trees and other planting as it would appear at "year 0" on completion of the development. As well as being more affordable, these younger trees are expected to grow to maturity more quickly than larger "standard trees", producing an effective natural screen

sooner. Furthermore, revised planting proposals feature a greater variety and density of planting than that previously proposed, including a new woodland area to the northwest of the site. This is principally to meet biodiversity net gain requirements, but will also have the effect of providing improved visual screening of the development from the west and north. Landscaping proposals are further detailed elsewhere in this submission, including a Landscape Management Plan which will ensure that the trees, hedges and other planting soon grows to maturity.

The impact of the amended proposed development on these assets is assessed to remain as per that for the consented scheme, with neutral / negligible change.

3.0 Summary and conclusion

The impact of the revised proposals on the heritage assets previously defined is assessed to be unchanged, with neutral or slightly beneficial change expected in all cases except for Wakehurst Farmhouse which continues to suffer slight adverse impact, albeit lessened from that of the consented scheme by the relocation of the polytunnels.