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# **PP/02/01324**

## **Lots Road Power Station And Chelsea Creek**

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**ROYAL BOROUGH OF  
KENSINGTON AND  
CHELSEA**

**DOCUMENT TYPE**

COUNCIL CASE 7

**PLANNING APPLICATIONS**

**PUBLIC INQUIRY**

PP/02/01324



# Lots Road Power Station and land at Thames Avenue development

Townscape and Visual Assessment by  
Professor Robert Tavernor, BA, Dip Arch, PhD, RIBA.  
on behalf of Circadian Limited

Appendices to Proof of Evidence  
January 2005





# Townscape and Visual Assessment

## Appendices to Proof of Evidence

Professor Robert Tavernor on behalf of Circadian Limited

Town and Country Planning Act 1990, Section 78

London Borough of Hammersmith and Fulham  
Royal Borough of Kensington and Chelsea

Planning Inspectorate Reference:

APP/K5600/A/04/1146268

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## Contents

App. RT/1 R. Tavernor, *Memorandum submitted to the Urban Affairs Sub-committee on Tall Buildings*, House of Commons Transport, Local Government and the Regions Committee, EV 75-78, HC 482-II, 22 January 2002.

App. RT/2 R. Tavernor, *From Townscape to Skyscape*, *The Architectural Review*, March 2004, pp. 78-83.

App. RT/3 Selected views of Lots Road in relation to its urban setting.

App. RT/4 A summary of policy and guidance relevant to evidence of Professor Robert Tavernor.



## INTRODUCTION

1.01 My name is Robert William Tavernor. I am a registered architect and university professor of architecture (previously at Edinburgh University and currently at Bath). My expertise derives from my experiences as a university professor of architecture, architectural historian, and as a designer, analyst and

critic of modern architecture and urbanism. I have published widely on architectural and urban issues, and have a particular interest in definitions of architectural beauty especially in relation to classical buildings and cities.

1.02 This memorandum derives from my recent experience as a principal Expert Witness at the Heron Public Inquiry held in the City of London between October and December 2001, concerning the application by the Heron Corporation to build a 37-storey speculative office building at 110 Bishopsgate. I supported the Heron Corporation's proposal designed by the architects Kohn Pederson Fox (KPF), which had been granted Planning Permission by the City Corporation but was called in by the Secretary of State following objections by English Heritage regarding—what they considered to be—its potential harmful impact on views of St Paul's Cathedral.

1.03 I evaluated KPF's design for 110 Bishopsgate by referring to the English Heritage/Commission for Architecture and the Built Environment (EH/CABE) consultation document, "Guidance on Tall Buildings", dated June 2001. I did so because it provides a useful compendium of the considerations contained in the relevant Unitary Development Plan (UDP) and other policy documents. I concentrated on the criteria the document recommends for evaluating tall building proposals in paragraph 5.7 (i), and the relationship of the proposal to its context. I also expressed my view concerning the quality of the architecture of the proposed scheme outlined in paragraph 5.7 (iv). My main conclusions were that:

- KPF's design for 110 Bishopsgate will produce an urban building that provides new accommodation in the City of exceptionally high quality.
- It will enrich the public realm and add to the variety of the street and the available building forms within the city.
- Its inclusion within the existing Eastern Cluster will enhance the skyline and will properly serve its context.
- It is a custom designed building that is entirely suited to its particular position in the Eastern Cluster.
- It will provide accommodation that reflects the changing attitudes to city life in the 21st century.
- Through a measured appreciation of the ancient and modern context in which it is to be placed, KPF have designed a forward-looking and ecologically advanced building that also acknowledges and respects its historic location.

## DEFINING ARCHITECTURAL QUALITY IN OUR CITIES

2.01 Most cities comprise of an agglomeration of different building types—predominantly residential and commercial. Buildings of the highest quality correspond to those parts of the city in which it is most desirable to live and work. These areas usually relate to opportunities for interaction and exchange, to quality of light, views and air, and are marked by high land values, which in turn tend to determine a high density of occupancy and/or exclusivity for that part of the city.

2.02 There are only very few isolated monuments in any city, and they usually bear significant public, state or religious significance. Such buildings are usually designed by the nation's leading architects. They define a city's status, quality and aspirations, projecting it nationally and even internationally. Such buildings may be physically detached from surrounding buildings, have an inviting public entrance—that is perhaps related to public open space—and be set apart from adjacent buildings by their appearance and the high quality of their materials and design. Although architectural monuments usually assert their presence on the urban scene, they are not necessarily tall.

2.03 A tall building is by definition prominent, but it is not necessarily a building of significant public value: height may have resulted from high land values, the demand for proximity and density of occupation, or because height symbolises power, authority and wealth. Consequently, some consider that a tall commercial or residential building has no right to dominate existing city views—especially in those cities where the quality of their historical monuments, spaces and buildings are revered. Where it is deemed beneficial to the future prosperity and image of a city to build tall buildings, clear guidelines concerning location, response to context and quality of design are essential. I believe that sufficient guidelines exist for this purpose already, notably the EH/CABE document on Tall Buildings, as well as the planning legislation enshrined in PPG1 and PPG15. (There are however problems associated with the implementation of these guidelines and Acts, which I will outline by way of conclusion to this memorandum.)

## ARCHITECTURAL QUALITY IN THE EH/CABE GUIDELINES REGARDING TALL BUILDINGS

3.01 Architectural quality is identified as a criterion relevant to the evaluation of Tall Buildings in the EH/CABE document. I agree. Because a tall building is visible from many vantagepoints, near and far, its design must be of the highest architectural quality. The same document also proposes that new tall buildings should usually be located within existing clusters of tall buildings. I also agree to this. Tall buildings have a "monumental" stature due to their very prominence, but, individually, they are unlikely to have true monumental—public and civic—status. It is their collective worth, their close proximity to one another in a



"cluster", which brings economic and visual benefits to a city and its people. With this in mind, I would wish to emphasise the following criteria as essential determinants of quality in tall buildings.

3.02 To add positively to an existing urban environment a tall building must normally be designed as an essential part of a "cluster of tall buildings": as part of an existing cluster, or in a location where a cluster has been planned. A cluster de-emphasises the individuality of a single tall building, and will create a collective silhouette on a city's skyline. It will perhaps form a backdrop to, or be seen in relation to valued historic monuments, and the extent and shape of a city's cluster or clusters should be determined in response to the views of principal monuments and their settings.

3.03 The shape and silhouette of a balanced and well designed cluster cannot be designed in the abstract, or according to generalised criteria. Its ideal shape and profile will be a measured response to its particular setting—topographical and historical—and good judgement will be required as to how an existing cluster can best be augmented by new buildings, or a new cluster defined and developed over a period of time.

3.04 Clusters of office buildings or mixed-use developments (retail, office and residential) are best located close to and even above transport interchanges (especially railways and bus stations), where there is likely to be an intensity of activity: such interchanges are also known as "nodal points" in the city. Advantage can be taken at nodal points of a high-density working and living environment that is supported by public transportation, and which minimises the need for private modes of transport and secondary journeys.

3.05 I believe that tall buildings should only be built in close proximity to urban nodal points, and that the cluster should be limited and well-defined. The desirability that tall buildings form dense urban clusters will usually preclude their location in non-urban environments. An isolated tall building should be an exception and should require special pleading—perhaps because it is of exceptional design quality and has extraordinary symbolical value for that city or site. Generally, isolated, one-off tall buildings that are not part of an existing or proposed cluster should be avoided.

3.06 The following considerations are relevant when designing the appearance of a tall building in relation to a cluster:

- its external form should be modelled in response to its compositional place within an existing cluster (so that it becomes an integral part of the existing urban scene), respecting the status of any revered public monuments and landmarks that may be affected by it;
- the materials of its exterior skin should be recognised as belonging to and enhancing the characteristics and qualities of the existing cluster, and set design standards for a proposed cluster; and
- the projected profile of an existing or proposed cluster should be outlined on maps and photographs (or equivalent—there was beneficial extensive use of computerised models and physical models and montages at the Heron Inquiry) so that its effect on the setting can be scrutinised from key viewing positions: in plan, in relation to bounding streets (as in the proposed "Mayor's triangle" in the City of London), and as a skyline silhouette

3.07 A tall building should be designed in response to its immediate physical context (using detailed Environmental Surveys). The existing street layout—open, straight, grid-like (Canary Wharf) or tight winding streets (City of London), their width and length—will dictate the footprint of a tall building and its potential to enhance or harm the existing streetscape. In this respect, an understanding and appreciation of the historical development of the immediate context is essential, and should be reflected in the design of the tall building. For example, the building's role as an historic gateway into a commercial area could be restated through the character of its elevational design.

3.08 The experience of a tall building at ground level is of paramount importance. It provides an opportunity to enrich pedestrian movement along surrounding streets, offering views into and through the entrance, framing and opening new views of existing or proposed local landmarks. Designs for tall buildings should explore the public potential of ground level and adjacent streets, and emphasis should be placed on the enhancement of public facilities, including retail and leisure. The quality of an integrated landscaping scheme at ground and street level is crucial if a tall building is to appear rooted to its site.

3.09 Ultimately, of course, the design must be fit for its intended purpose, and provide desirable, attractive and convenient accommodation for its occupants. In my opinion, the effect on the quality of street life of tall buildings with small footprints is preferable to that of groundscrapers, which consume entire urban blocks and dominate the character of whole street frontages.

#### AUTHORITIES AND PROCEDURES

4.01 I have referred already to CABE, English Heritage and, indirectly, City Councils as the formulators of UDPs, and they have their equivalent counterparts in Scotland, Wales and Northern Ireland. These bodies have access to relevant knowledge and expertise to make informed judgements about the potential development of clusters in different parts of the UK. However, relations between these authorities and interested parties are too often adversarial, and when discussion breaks down, the expensive, time-consuming Public Inquiries that result serve only to polarise opinion which is often undermining for negotiation in the future. At the Heron Inquiry the battle lines comprised of the Heron Corporation, the City Corporation, the

GLA, and CABE, who were set in opposition to English Heritage, Westminster City Council and other interested parties.

4.02 Measures should be implemented to minimise the need for Public Inquiries. Alternative procedures may be found by studying good practice elsewhere in the world, and effective mediators and opportunities for mediation should be sought.

4.03 The process of mediation would be greatly assisted if readily updateable 3-dimensional computer models of cities existed, built to agreed national standards by impartial organisations. They should become trusted tools, as reliable and neutral as an Ordnance Survey map.



Below, view of Renzo Piano's London Bridge Tower from Unilever House (courtesy of Hayes Davidson.)

theory

### Urban design as art

The Viennese architect and planner, Camillo Sitte, was the first modern to describe urban planning as essentially an art. In *City Planning according to Artistic Principles* (1889) he articulated his admiration for the civic and artistic character of pre-industrial European towns and cities rather than the relentless straight-edged, mid-nineteenth century Boulevards that Baron Haussmann sliced through medieval Paris. Sitte argued that the intuitive creative drives that underlay medieval examples of more varied urban spaces could be presented as principles: his contemporaries considered them to be no more than happy accidents. Sitte reasoned that city planning could and should be regarded as an art, and one based on the spatial and formal compositions that preceded the considerable population explosion of his century. He referred to the wisdom of the ancients as proof for his assertions, especially the architectural and urban accounts of Vitruvius and Alberti: the basic idea of his book he wrote 'is to go to school with Nature and the old masters [...] in matters of town planning'.

In London, the principles of Classical design promulgated by the 'old masters' were filtered mainly through Palladianism and two dynastic monarchies, the Stuarts and Hanoverians, who oversaw the urban transformation and expansion of medieval London. Georgian London, built during an unbroken monarchical span of 116 years between 1714 and 1830, is characterized by regular geometry, symmetry and grand Classical squares lined with palatial terraces. The Victorians built on this example, and to a grander scale, retaining or extending the underlying spatial structure and urban character of London. Their larger buildings affected the grain of the existing built form, by amalgamating several plots to create larger edifices that were usually bulkier than those they replaced. London's skyline acquired a new silhouette, but the changes brought by the nineteenth century were not as radical as those of the twentieth century, when commercial and residential towers were built increasingly tall.

There are no direct answers to the challenge that height presents to the image of a historic city like London in the writings of Vitruvius, Alberti and Sitte: they were concerned with a human-scaled

environment. Judging by recent planning proposals in London, the challenge of height is set to increase. Towers – residential and commercial – are being designed for London that will be the tallest in Europe. Renzo Piano has recently been granted planning permission for London's tallest building yet, for a mixed residential and commercial tower that will be 303m tall when completed in 2009. Consequently, there is renewed interest in defining appropriate guiding principles that will enable tall buildings to sit well along the finest architectural and urban successes that characterize London. Intriguingly, many of the traditional principles advocated by Sitte have been absorbed into official planning policy guidance in the last decade in England and Wales, establishing a context within which tall buildings are being designed. This re-engagement with Sitte's urban ideals represents a curious volte-face. During most of the twentieth century, tall buildings were a powerful symbol of a new political and social ideology, which attempted to sweep away a traditional attachment to the forms and spaces of the pre-industrial city, of traditional streets and squares lined with buildings.

In London, St Paul's Cathedral and its surroundings have become a battleground for modernists and traditionalists. In longer views, its physical and visual relation to the dynamically changing commercial centre of London continues to provide the focus for an extraordinary debate: one that is likely to have a dramatic effect on London's appearance during the early twenty-first century.

**London's skyline and the impact of the dome of St Paul's**  
St Paul's is at the western end of the City of London, the 'square mile' originally settled by the Romans. By the seventeenth century, the city was overcrowded, and the Great Fire of 1666 thrived on its density, devastating a large section of its medieval urban fabric. Christopher Wren proposed a radical replacement masterplan for the City, but this was rejected by the authorities in favour of a quick rebuild on the

foundations of the former medieval street pattern. In fact, the most radical physical changes were affected by legislation introduced in the 1667 London Building Act, which succeeded in restricting the use of flammable building materials and building heights to a maximum of four storeys. Well into the nineteenth century, non-public buildings were kept low, and buildings proposed higher than 30m required special Metropolitan Sanction. Wren did of course succeed in replacing the burnt out old St Paul's with a great Baroque-inspired edifice, and his cathedral grew to dominate, both physically and spiritually, the relatively chaotic physical scene that surrounded it.

The great domed form of St Paul's has provided the primary focus for historic views of London, and because the medieval grain of the City is narrow and winding, the best of these are to be had from across the River Thames, to the south and west. Some of the most famous views of Wren's St Paul's have been taken from Somerset House River Terrace. It is well placed for a panoramic view, being located on a major bend of the River Thames, roughly midway between the twin cities of London, Westminster and the City, offering views of each. Paintings by Antonio Canaletto (mid-eighteenth century) and John O'Connor (late nineteenth century) clearly illustrate the changing setting of St Paul's down the centuries. They depict quite different scenes: of London as a great maritime centre, an elegant Venice of the north; and as the capital of industrial might and global authority. The square mile of the City has since become a thriving global financial centre, and London is in the premier league of world-class cities, rivalled only by New York and Tokyo. It is not unreasonable to suggest therefore that its image should demonstrate and be emblematic of the considerable power and authority of London as it is now – not as it was once imagined to be.

Certainly, this is the positive view expressed by Corporation of London's planners today, who regard tall buildings as desirable assets that will meet practical demands on limited space and will project an

# FROM TOWNSCAPE TO SKYSCAPE

In an edited extract from a lecture due to be given to mark the 75th anniversary of the University of São Paulo later this month, Robert Tavernor from the University of Bath analyzes the future of London's distinctive skyline.







Antonio Canaletto, view of the City of London and the Thames from Somerset House River Terrace (mid-1750s). Royal Collection, Windsor.



John O'Connor, The Victoria Embankment and St Paul's from Somerset House River Terrace, 1874. Guildhall, City of London.

image of an international, thriving location. Their vision is not universally condoned. Traditional urbanists, and the heritage lobbies such as English Heritage, argue that tall buildings undermine the 'timeless' character of valued historic monuments, and distant views of St Paul's are frequently used in evidence – by progressives and traditionalists – for and against tall buildings. Yet, paradoxically, despite these differences, there is a growing consensus regarding what constitutes the principles of good urban design.

#### Modern London: urban renaissance through good design

Several publications produced between 1999 and 2002 give meaning to the art of urban design in England and Wales today. The government-sponsored think-tank, the Urban Taskforce, produced a report, *Towards an Urban Renaissance* (1999/2002), which emphasizes the value of good design for the urban environment as a primary means to reversing exodus from English towns and cities. The report reasons that urban renaissance will be stimulated by re-establishing 'the quality of urban design and architecture as part of our everyday urban culture' by establishing 'a new vision for urban regeneration founded on the principles of design excellence, social well-being and environmental responsibility within a viable economic legislative framework'. They believe that the key to regeneration will be cities with densely populated, compact, well-connected cores, which will encourage people to travel by public transport, to cycle and walk, and it goes on to sketch out ten key principles of urban design that will encourage the creation of 'more liveable places'.

Another influential publication is *By Design. Urban design in the planning system: towards better practice* (2000), produced by a now defunct government department (DETR) and a government quango, the Commission for Architecture and the Built Environment (CABE). Significantly, *By Design* defines urban design as the 'art of making places for people', and it describes a 'planning toolkit' comprising of seven key principles or objectives of urban design that need to be mastered by would-be urban designers. There is some overlap

between the two reports: both are concerned to promote character in townscape by reinforcing locally distinctive patterns of development and culture, and by establishing a high quality public realm in which people are placed before traffic.

Although never explicitly acknowledged as a primary source, there is a correlation between the ideas of Sitte and the planning toolkit of *By Design*. While Sitte filtered the natural planning and design approach of Vitruvius and Alberti, Sitte's notion that urban planning is an art – that we should strive to create 'places' connected by a hierarchy of traditional squares and streets for the pleasure of people – has been accepted as 'natural' commonsense in *By Design*. The reversion to historic notions of place-making represents a considerable victory for traditional urbanists. Their success is due in part to the fact that there have been only a handful of Modernist urban triumphs in the UK, while most were unmitigated physical and social disasters.

*The Architectural Review* also assisted this turnaround, by trumpeting the virtues of pre-industrial European place-making loud and long. It promoted a William Morris-Sittesque urban vision between 1947 and 1958 through a series of essays written by Gordon Cullen and others who defined a humanist reinterpretation of Modernism under the banner of Townscape. Cullen defined Townscape as the 'art of relationship' and the 'art of environment'. Like Sitte, he preferred the formal and spatial associations of form and space that appeared 'natural' to someone experiencing somewhere on foot; places that appeared to have been shaped by time and necessity, rather than the pragmatic dictates of urban regulators, especially traffic and lighting engineers.

Cullen was one of a powerful group at the *Review* at that time, which included J. M. Richards, Nikolaus Pevsner, and Osbert Lancaster: they retained a collective affinity for the art of place-making, and largely opposed the French and German rationalism that had by then attained an intellectual and moral high ground in schools of architecture. Cullen published *The Concise Townscape* (1961) on the back of his essays and the *Review's* proprietor, Hubert de Cronin

Hastings, wrote a parallel, but now less well-known volume, *The Italian Townscape* (1963), under his pen name Ivor de Wolfe. *The Concise Townscape* was a more popular success, partly because Cullen drew compelling images presented as elegant snapshot cartoons of familiar city scenery. Like Canaletto, he provided evocations, picture-postcard memories, of a vanishing, or already vanished urban order. Townscape was inevitably dismissed by the Modernist architectural elite for being reactionary and intellectually narrow in outlook, and its influence languished in Britain until the Prince of Wales, spurred on by the success of his own architectural and urban *Vision of Britain* (1989), engaged the talents of the architect-theorist Leon Krier to masterplan Poundbury as a 'historic' townscape extension of Dorchester.

#### Townscape and visual assessment

Modernists have generally deplored what they regard to be the mediocrity of the Prince's townscape vision, but this approach has strong intellectual roots of its own and it has wide public appeal. Recent governmental planning policies provide the structure for traditional place-making. The government's Planning Policy Guidance Note 1 (PPG1, 1997) places the emphasis on 'good design' to help 'promote sustainable development; improve the quality of the existing environment; attract business and investment; and reinforce civic pride and a sense of place'. Places are created by time and PPG15, on Planning and the Historic Environment (1994), describes the general government commitment to preserving the historic environment, and it provides a full statement of policies for the identification and protection of historic buildings, conservation areas and other essential ingredients of the historic environment.

Townscape has even entered the official planning lexicon: the effective implementation of these policies being judged through 'Townscape and Visual Assessments', a key chapter in an Environmental Statement. The ES describes the use of materials, details, scale and massing in a proposed development, which is demonstrated through drawings, photographs and visualizations.

These combine with professional judgement to provide an objective and subjective assessment of the proposals. Townscape and Visual Assessments are typically used to identify key views of the development site in relation to existing buildings and areas of historic and architectural importance. It contributes to a wide-ranging spatial masterplan of part of the town or city being developed, something that *Towards an Urban Renaissance* and *By Design* consider essential to the urban design process.

The relevance of a clearly presented three-dimensional framework of buildings and public spaces is being taken up with some vigour in *The London Plan*, a spatial development strategy for London being produced for the Mayor of London, Ken Livingstone, who heads the Greater London Authority (GLA). *The London Plan* is being developed to ensure an appropriate mix of buildings and land use for the capital. A preliminary document, *The draft London Plan* (2002), was subject to public examination last year, and it is evident that the emerging policies are very much in tune with contemporary concerns: 'Good design is central to all the objectives of this plan'. *The London Plan* embodies 12 main policies designed to promote world-class architecture and design, and – as with *Towards an Urban Renaissance* – a fundamental objective is the compact city. The Mayor acknowledges that the desired compactness will inevitably lead to new buildings having greater height. Subsequent policies therefore focus on the size, scale and consequent impact of tall buildings on London's built heritage and skyline. Location of tall buildings, and the relevant viewing positions from which to assess their likely impact will therefore be key issues for the future.

However, very tall buildings are not an inevitable consequence of compactness. The government has concluded that their contribution to urban renaissance was 'very limited' and that the 'proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid- or low-rise development and in some cases are a less efficient use of spaces than alternatives. They have, for the most part, the advantages and



## theory

disadvantages of other high density buildings'. (House of Commons, Transport, Local Government and the Regions Committee, *Tall Buildings: Memoranda submitted to the Urban Affairs Sub-committee*, 22 January 2002.) In fact, the Committee's research indicates that 'Tall buildings are more often about power, prestige, status and aesthetics than efficient development'. Tall buildings may not be necessary, but the report recognizes that tall buildings are certainly objects of desire: 'There is one powerful and irrefutable argument in favour of tall buildings: some people find them very beautiful. The Mayor of London is delighted by the Manhattan skyline. His love of tall buildings is shared by many architects and others'.

### The art of designing tall buildings

It is not clear how numerous these 'others' are. It is probable that public dislike of tall buildings outweighs those who find them beautiful. However, the notion that they could be beautiful if well sited and designed – in contrast to the prosaic post-war residential slab blocks that sprang up seemingly randomly across London – was first mooted in the 1960s, when the first wave of commercial tall buildings were being built in central London. The Royal Fine Art Commission (the forerunner of CABE) complained in its 18th Report of 1960-62 of the poor and inappropriate siting of tall buildings. But noted that 'exceptionally high buildings look better in the form of towers rather than slabs and a carefully arranged cluster of towers may be preferable to a number of isolated ones'. In 1969, a governmental-sponsored Public Inquiry, the Layfield Committee, recommended the creation of a High Buildings Map that would control where tall buildings would be permitted, and a Skyline Protection Bill was introduced to Parliament in 1977, which recommended the protection of views by designation that would be similar to the status afforded to listed buildings and conservation areas. None of these recommendations passed to the statute books. However, the notion of 'clusters' of towers, combined with the protection from the intrusion of tall buildings of important views across London, have together proved influential in relation to views of St Paul's Cathedral from the west. It was demonstrated at a major Public Inquiry in 1976 that a tall building proposed for Broadgate, next to Liverpool Street Station – almost a mile north-east of the cathedral – would be seen in relation to the silhouette of the dome of St Paul's when viewed from Henry VIII's Mound in Richmond Park, some 10 miles to the west. Planning permission was refused and a vast low-lying groundscraper built instead.

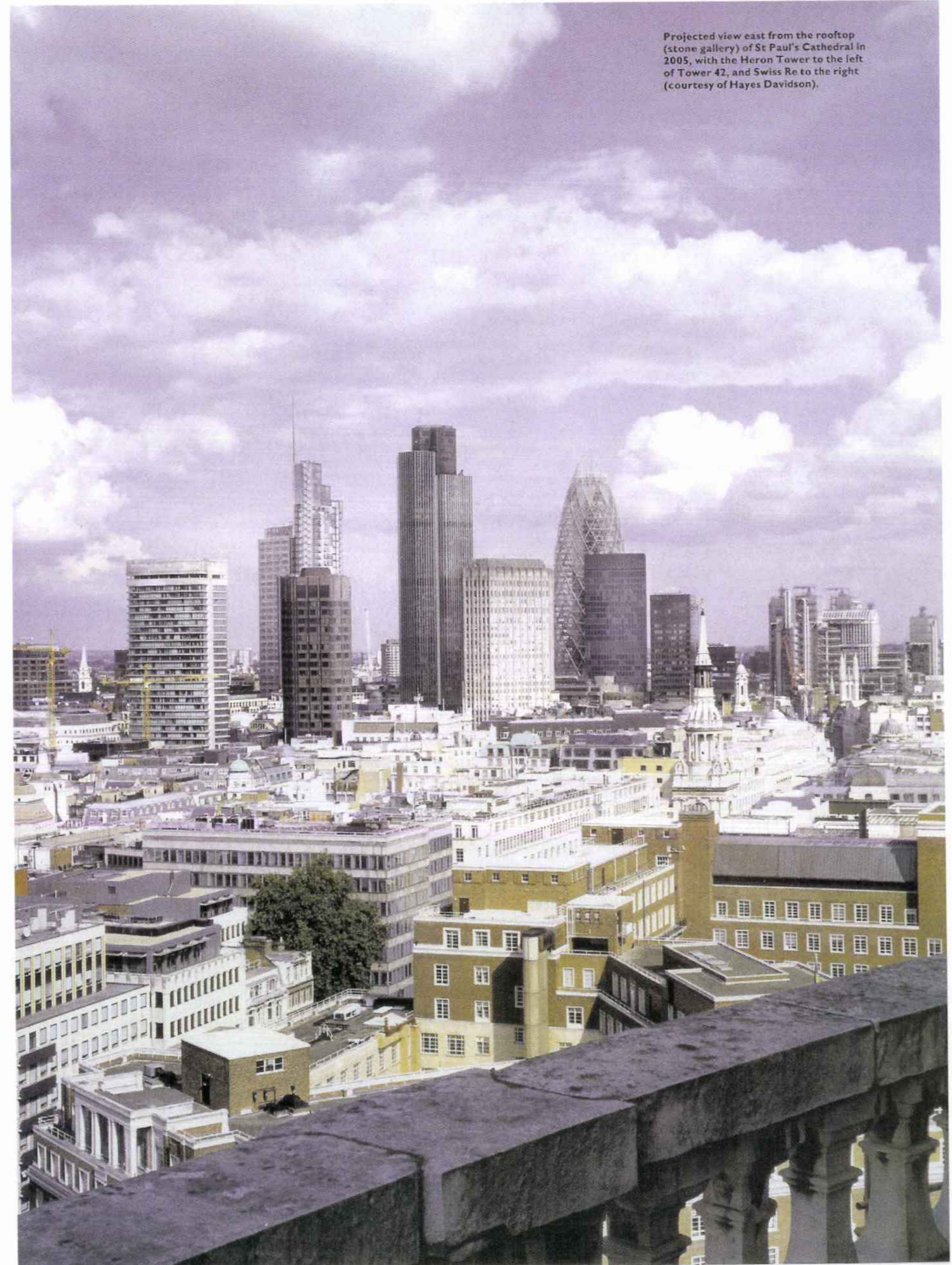
The importance of distant views in this and other cases led to several follow-up studies through the 1980s, and the government responded with its Strategic Guidance for London Planning Authorities (RPG 3A, 1991). This established a list of 10 Strategic Views across London – eight of which focus on St Paul's Cathedral, and two on the Palace of Westminster (the seat of government and a World Heritage Site) – which was intended to prevent tall buildings from visually interfering with the settings and silhouettes of these internationally recognizable landmarks. It had been observed in the late 1970s, that tall buildings seen behind St Paul's can have two effects: they can either create an effective backcloth of building mass with which the character of the Cathedral can be compared, or spoil its distinctive silhouette by obscuring and diffusing its clear outlines (City of London Development Plan, Subject Study St Paul's Heights, 1978: para 11.11, p88). The 'backcloth' referred to is the group of tall buildings to the north-east of St Paul's. Known as the City or Eastern Cluster, it comprises a loose grouping of high-rise buildings, which protrude above a general plateau of mid-height commercial buildings, and which for the last few decades has had Tower 42 (T42 –

the former National Westminster Bank tower) as its most prominent structure. T42 is around 180m in height, and is surrounded by a lower tier – a plateau of buildings – mostly ranging between 80m and 120m in height. The latest financial boom of the late 1990s has seen Corporation of London planners and property developers exploring the potential for expanding and consolidating the Eastern Cluster. The most recent addition is Swiss Re, designed by Foster and Partners and completed recently (AR November 2003): it has a similar height to T42. The Heron Tower, designed by Kohn Pedersen Fox, was granted planning approval by the Secretary of State in 2002, and it will join T42 and Swiss Re among the tallest – upper tier – of office buildings in the Eastern Cluster. These are tall, slender towers with narrow floor plates (compared to typical US dimensions that have been adopted at Canary Wharf), because of the small plot sizes that characterize the City's ancient urban grain. As the RFAC predicted in the early 1960s, a grouping of tall slender towers has a pleasing appearance, and the overall effect here is to create a physical mass that is hill-like in profile and which provides a unified backdrop to St Paul's when viewed from the west. It is evident from sophisticated computer generated visualization prepared for the Heron Tower public inquiry that, when viewed from the west, St Paul's continues to remain distinguishable and distinguished in the City's skyline.

The precise character of this particular assembly of tall buildings will not last for long. The dynamic of commercial change in the City is rapid, and many new towers have been planned for the Eastern Cluster in recent months. If built, they will stretch its boundaries and challenge its present maximum heights. The evolution of the cluster's form will require careful – artistic – management, and a continuing three-dimensional appraisal will be essential, of both the townscape experience at street level, and the skyscape in medium and long views. It is anticipated that the Mayor's spatial plan for London will concern itself with both urban dimensions.

Meanwhile, the most useful attempt to reconcile the different attitude to tall buildings has appeared in a joint publication by English Heritage (EH) – the government's guardians of the nation's historic built heritage – and CABE, the principal overseers of design quality in the developing built environment. The EH/CABE *Guidance on Tall Buildings* (2003) recommends that any proposal for a tall building should be of the highest quality of design, aesthetically and environmentally, and that proposals should be considered in context, in the round. In particular, it recommends that these appraisals should identify 'those elements that create local character and other important features and constraints, including streetscape, scale, height, urban grain, natural topography, significant views of skylines, landmark buildings and areas and their settings, including backdrops, and important local views, prospects and panoramas. Opportunities where tall buildings might enhance the overall townscape, or where the removal of past mistakes might achieve a similar outcome, should be highlighted'.

Clusters of tall buildings are being planned at major transport interchanges in London, and they are proposed or are already growing in other UK cities. Traditionalists are right to be concerned about potentially harmful impact of tall buildings on historic settings. But, ultimately, the art of urban design is to transcend time, to provide continuity with the past as well as meet the needs of now and the future. A complex – not simple – multi-disciplinary approach that pulls together the art and science of urban design is perhaps the best way to balance effectively the demands of time and necessity. So the historian has as relevant a role in the process of urban design as the architect, planner and politician. Sitte acknowledged this more than a century ago.



Projected view east from the rooftop (stone gallery) of St Paul's Cathedral in 2005, with the Heron Tower to the left of Tower 42, and Swiss Re to the right (courtesy of Hayes Davidson).



# Appendix RT/3    Selected views of Lots Road in relation to its urban setting

## Contents

Introduction: the selection of views

Views Assessment

Summary Table of Views

Summary of Significance of Impact

Conclusion



# Introduction: the selection of views

## The process of selection

### 1.1

I have selected 27 viewpoints to provide a 360-degree appreciation of the proposed development: four of these viewpoints have been photographed twice, by day and by night providing a total of 31 views for assessment below. Not only are these views of the proposed development in differing lighting conditions, many of them demonstrate the kinetic quality that the proposed buildings would have in relation to one to another, and to Lots Road power station; particularly the changing relation of the proposed residential towers to the two surviving chimneys of Lots Road power station.

### 1.2

Of the 39 viewpoints identified and referred to in Appendix C1 of the December 2002 assessment, twelve were selected by the Anthony Blee Consultancy for inclusion within Chapter 11 of the main December 2002 ES (views CP1, 3, 5, 7, 8, 9, 10, 12, 13, 14, 33, 36) because they were considered of prime importance or significance. These views are highlighted in blue on Figures 11.1 and 11.2 of the Updated ES 2004. Details of all the views originally assessed by the Anthony Blee Consultancy are provided in Appendix C1 of the December 2002 assessment.

### 1.3

I selected twelve additional views to complement those provided by the Anthony Blee Consultancy: eleven are new (RT1 to RT11 inclusive), the twelfth view from Brompton Cemetery was included in Appendix C1 of the original December 2002 assessment as CP19, but was omitted from Chapter 11 of the main December 2002 ES because the impact of the proposed towers on views from Brompton Cemetery were considered to be low. I considered that it merited inclusion in the Updated ES 2004 where it is identified as CP19 (RT12).

### 1.4

Since the Updated ES 2004 was submitted, three further viewing positions in Brompton Cemetery were photographed in November 2004, which are identified here as RT13, RT14, RT15. Also, four nighttime views have been generated, identified here as RT16, RT17, RT18 and RT19. The additional Brompton Cemetery views were produced at the request of the Friends of Brompton Cemetery, having regard to the letter to the Planning Inspectorate dated 10 July 2004 from their representative Mr Bernard Selwyn. Mr Selwyn helpfully identified the exact positions of these three additional views from Brompton Cemetery when I accompanied him during a visit in September 2004.

## The selected views

### 1.5

The selected views permit an assessment to be made of the proposed development at Lots Road ^ and especially its residential towers. A number of progressions have been identified and assessed as part of the visual analysis of this development. Typically in the views from the wider area the full bulk of the power station is only occasionally conspicuous, while the two towers are more often apparent. Similarly, the proposed residential towers are more visible in 360-degree views of the site than the proposed residential blocks surrounding them. Together the power station chimneys and proposed residential towers would provide a single landmark composition. On account of their carefully profiled modelling and well-considered disposition to one another, it will be apparent from the views that they would generate a dynamic formal counterpoint of real sculptural quality on the skyline. From different viewing positions the proposed towers and existing chimneys would appear to change positions, relative to one another and to their setting. This effect - which is exploited to great effect for sculptures - would be appreciated in particular when the development is viewed from the riverside, especially where views towards the site are across open water. The views assessed here are:

View	Position	View direction
CP1	Northern end of Chelsea Bridge	View w/s-w.
CP3	Chelsea Embankment, near Royal Hospital's Embankment Gardens	View w/s-w.
CP5	North end of Albert Bridge	View s-w.
CP7	Northern end of Battersea Bridge adjacent to Cheyne Walk	View s-w.
CP8	South end of Battersea Bridge	View w/s-w.
CP9	Wandsworth Riverside Walk (1)	View w.
CP10	Wandsworth Riverside Walk (2)	View w.
CP12	Riverside by Vicarage Crescent, Battersea	View n-n-w.
CP13	Wandsworth end of Battersea Rail Bridge outside Graveside Walk	View n/n-w.
CP14	Southern end of Wandsworth Bridge	View n/n-e.
CP33	Western pavement of Ashburnham Road in line with Tadema Road	View s/s-e
CP36	Tadema Road	View s/s-e.
RT1	St Mary's Churchyard, Battersea	View n-w.
RT2	Old Swan Wharf	View n-w.

RT3	Plantation Wharf Quayside	View n.
RT4	Cheyne Walk/Milman's Street	View s-w.
RT5	Cheyne Walk/ World's End	View s-w.
RT6	Cremorne Gardens Pier	View s-w.
RT7	Tadema Road near to Burnaby Street	View s/s-e.
RT8	Junction Burnaby Street and Tetcott Road	View e/s-e.
RT9	Marina in Chelsea Harbour	View n/n-e.
RT10	Chelsea Harbour Pier/ Quayside	View n/n-e.
RT11	Townmead Road beside the Imperial Wharf development site	View n/n-e.
CP19 (RT12)	Brompton Cemetery	View s-w.
RT13	Brompton Cemetery (new view 1)	View s-w.
RT14	Brompton Cemetery (new view 2)	View s-w.
RT15	Brompton Cemetery (new view 3)	View s-w.
RT16	St Mary's Churchyard, Battersea (cf. RT1)	Nighttime view n-w.
RT17	Cremorne Gardens Pier (cf. RT6)	Nighttime view s-w.
RT18	Tadema Road near to Burnaby Street (cf. RT7)	Nighttime view s/s-e.
RT19	Chelsea Harbour Pier/ Quayside (cf. RT10)	Nighttime view n/n-e.

### 1.6

Having regard to the external character and perceived material qualities of the proposed development, and particularly of the two proposed residential towers (KC1 and HF1), the impact will be judged either to be adverse, negligible, or beneficial to the existing townscape. If negligible, or neutral, no further comment is made. Where adverse or beneficial, the degree of impact is judged to be minor, moderate, or substantial, and in relation to a local, district, regional, national and international context.

### 1.7

In summary, the significance criteria used here are: adverse, negligible or neutral, beneficial and where adverse or beneficial, minor, moderate and substantial. The extent of this significance is then judged to be local, district, regional, national and international.



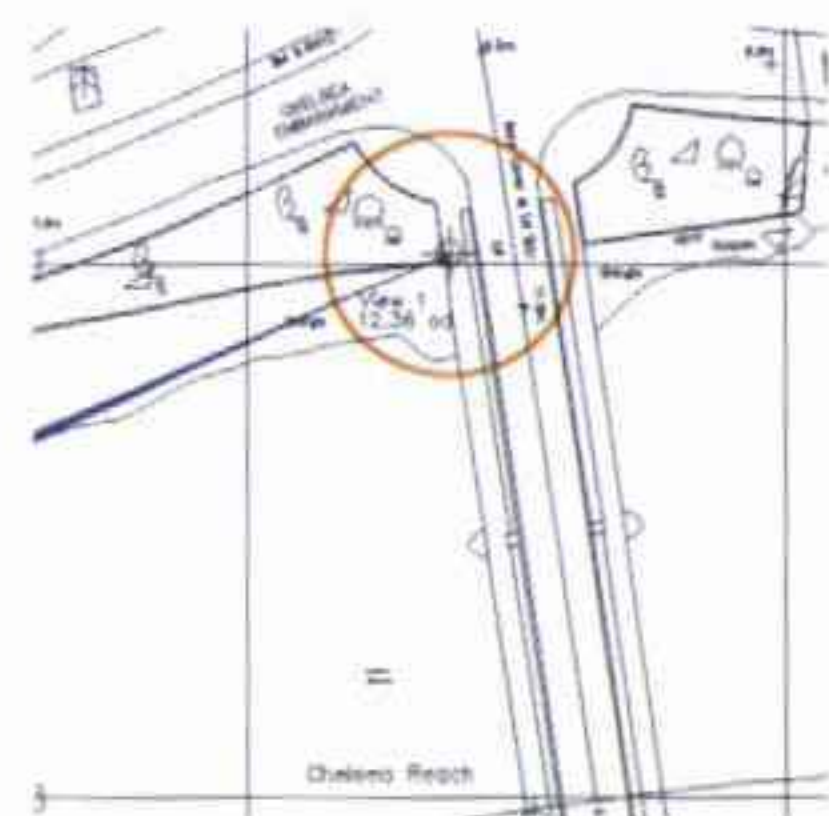
# Views Assessment

## View CP1 . Northern end of Chelsea Bridge

### Existing

#### 1.8

The panorama from this viewpoint extends from Battersea Park to Albert Bridge with the towers of the World's End Estate beyond the bridge and Lots Road power station in the far distance. Albert Bridge was designed by engineer R M Ordish and constructed between 1871-3. It connects Albert Bridge Road, which forms the western boundary of Battersea Park (a conservation area within the London Borough of Wandsworth), the vegetation of which dominates the left half of the view. This view was taken before the power station was decommissioned, and smoke appears to be emanating from its chimneys. The primary interest is the broad, straight stretch of river (Chelsea Reach) and the landscaping of Battersea Park bordering and lying beyond the river edge: because of the bend in the river the power station appears to be on the Wandsworth side of the river, and World's End on the opposite bank. The brightly painted Albert Bridge defines the extent of the immediate view and visually links these landmark structures.





**Proposed****1.9**

The two proposed towers would provide slender distant objects on the horizon. The taller tower (HF1) would rise into the open sky of the horizon and the lower tower (KC1) would mostly obscure the chimneys of the power station. KC1 would appear to have a similar height to the residential towers of World's End and would connect them visually to the taller HF1: Albert Bridge would appear to span between World's End and the proposed Lots Road development. The proposed towers would not harm the setting of Albert Bridge. They would provide a more distinctive landmark on this bend in the River Thames, adding to the visual interest of the view.

**Significance of Impact:**

Beneficial, minor, and district.



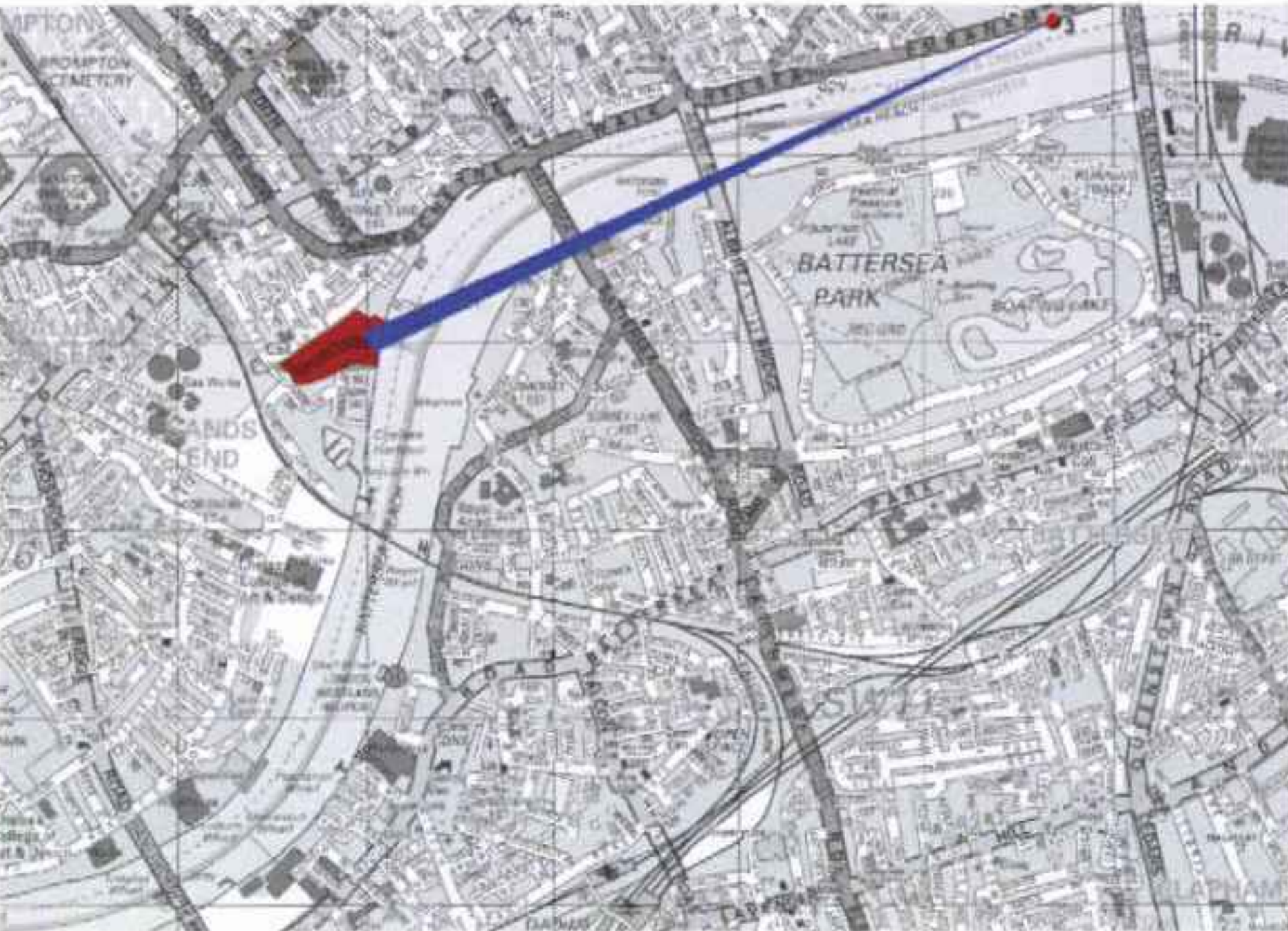


View CP3. Chelsea Embankment,  
near Royal Hospital's Embankment Gardens

Existing

1.10

This view is taken from the Embankment close to the southern boundary of Sir Christopher Wren's Chelsea Hospital (Grade I listed): this is not a view that can be enjoyed from the grounds of Chelsea Hospital. The Embankment (1860s, Sir Joseph Bazalgette) changed the relationship of the Hospital to the River Thames, separating it from the riverbank - a separation exacerbated by the busy road that now runs along it and the large Plane trees that flank either side. The Peace Pagoda at the river edge punctuates the tree line of Battersea Park and provides a point of visual interest. It is a recent landmark: the Pagoda was a gift to London in 1985 from the Japanese Buddhist Order, Nipponzan Myohoji. The brick chimneys of Lots Road power station rise above and contrast with Albert Bridge, to the left of which is the office and residential development designed by Foster and Partners.





**Proposed****1.11**

The two proposed residential towers would be slender distant objects on the horizon. The lower tower, KC1, would mostly obscure the brick chimneys of the power station, while the taller HF1 would punctuate the sky to its side. They would provide a new landmark compatible with the Peace Pagoda: the eye would be drawn from the Pagoda to HF1, a secondary landmark on the horizon. The proposed towers would not harm the setting of Albert Bridge: indeed, the glass and steel cladding of KC1 would have less of a visual impact on Albert Bridge than the brown brick power station. The proposed towers would provide a high quality landmark and distant focus to the view.

**Significance of Impact:**

Beneficial, minor, and district.



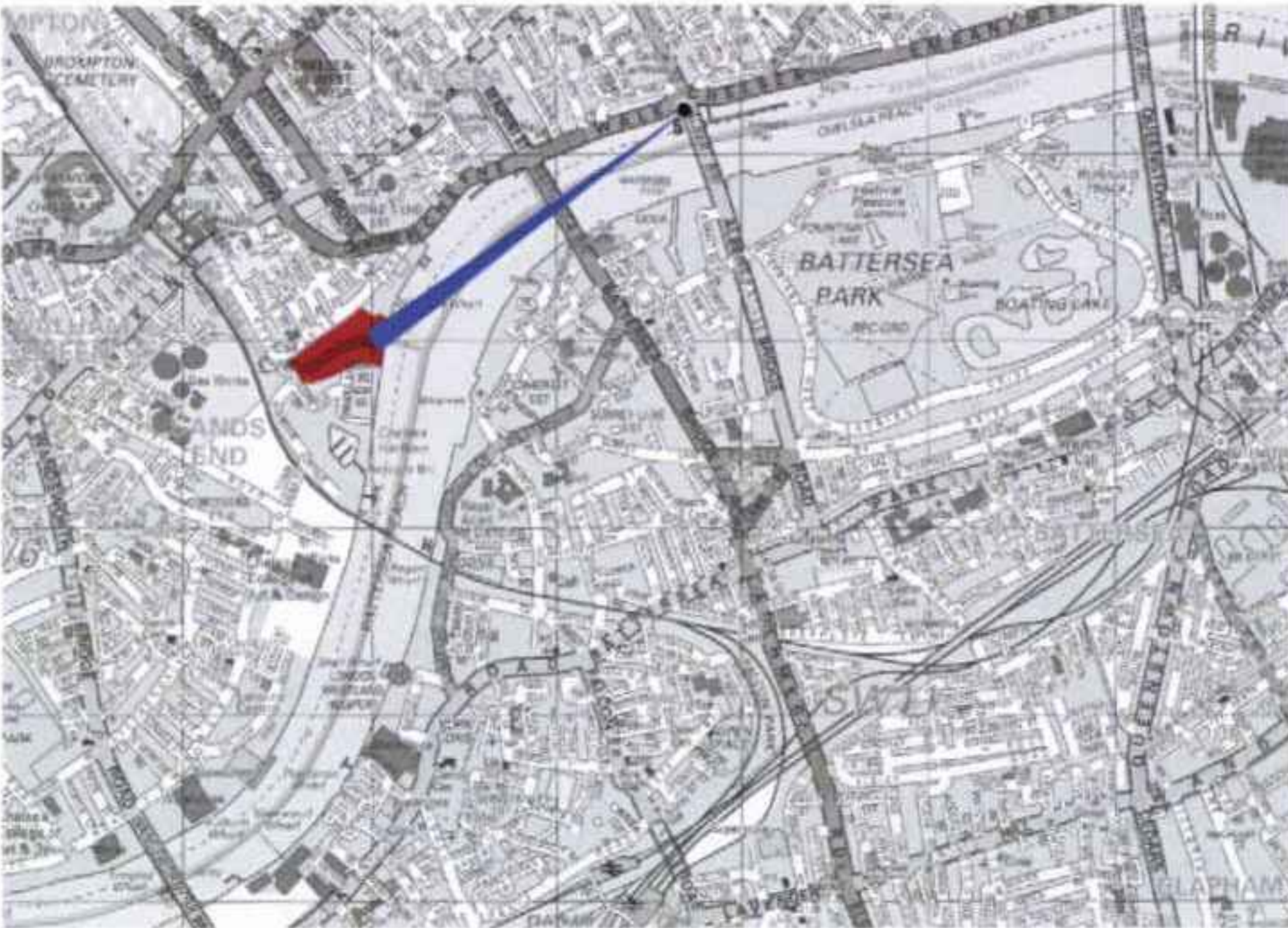
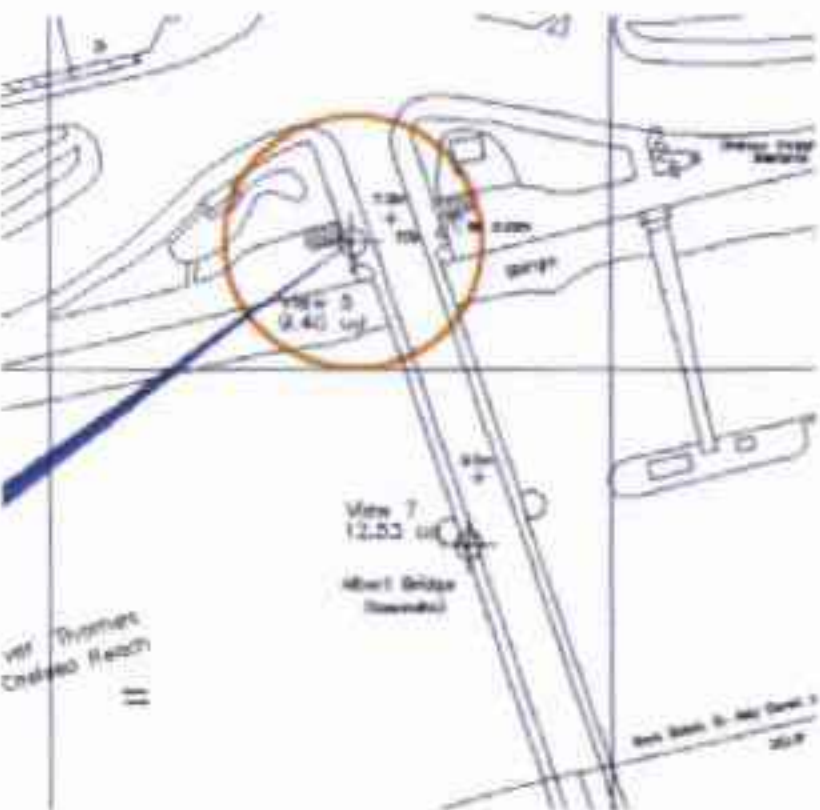


View CP5. North end of Albert Bridge

Existing

1.12

This view is from the north end of Albert Bridge at the junction with Cheyne Walk, which extends along the Embankment in the foreground and right. The skyline beyond Battersea Bridge is diverse in character and quality: Montevetro rises to the left, apparently close to the southern end of Battersea Bridge, beyond and slightly to the right rises the Chelsea Harbour Belvedere Tower, with its distinctive pagoda-like top; the World's End Estate is to the right. The brick chimneys of Lots Road power station rise close to the mid-span of Battersea Bridge: this photograph was taken before it was decommissioned, and smoke can be seen rising from its chimneys.





**Proposed****1.13**

The two proposed towers would be viewed head on, and would appear at their most slender in this view. They would provide a central focus between Montevetro and World's End. They would be in scale with the breadth of the River and the broad arched spans of Battersea Bridge. They would not obscure the chimneys of the power station and, while more distant than Montevetro and World's End, would add considerably to the variety and visual interest of this view.

**Significance of Impact:**

Beneficial, moderate, and district



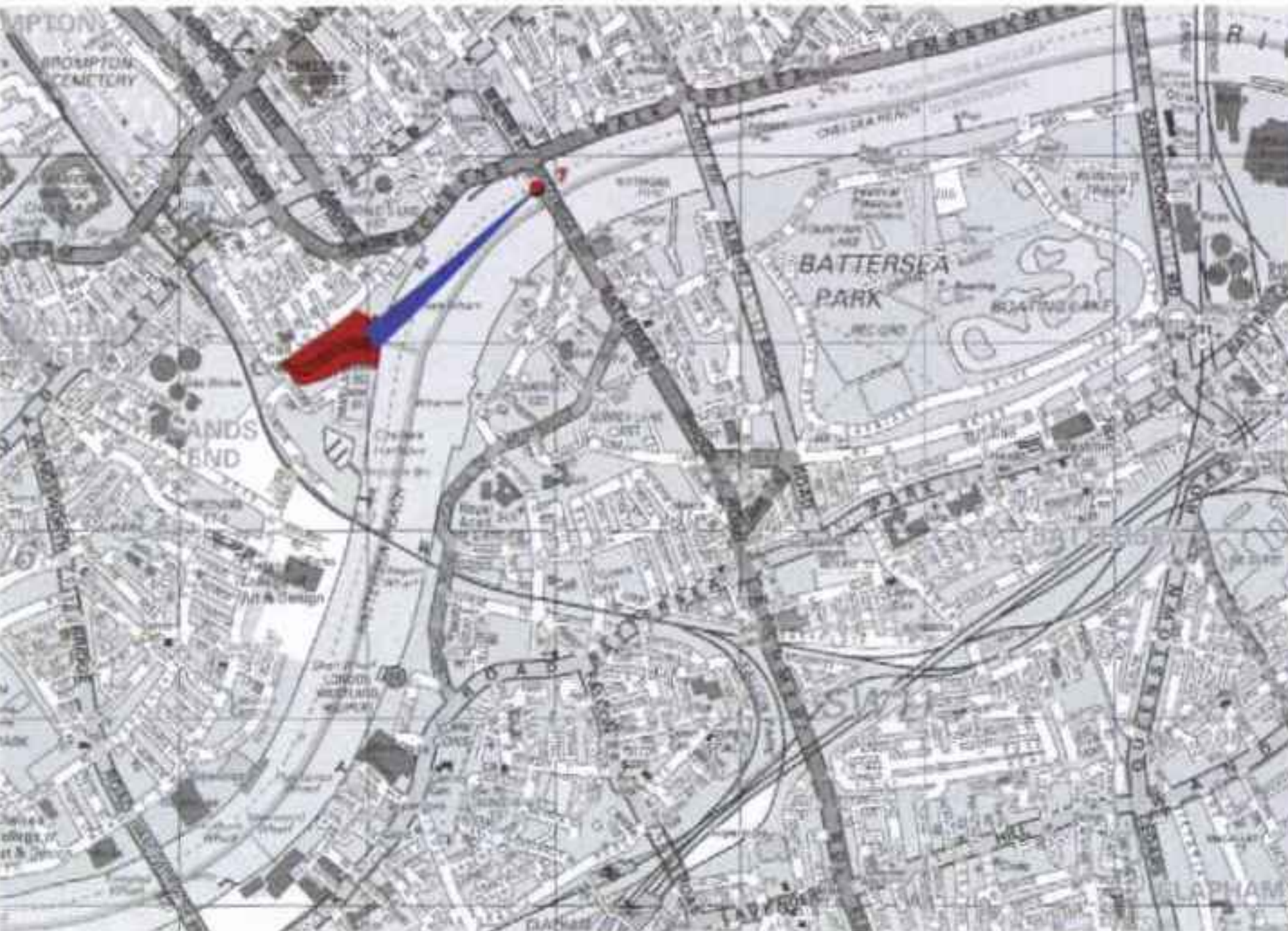


View CP7. Northern end of Battersea Bridge  
adjacent to Cheyne Walk

Existing

1.14

This panoramic view has Montevetro (on the left) and the residential towers of World's End (on the right) as bookends to the view: they apparently rise higher than the chimneys of Lots Road power station and Chelsea Harbour Belvedere Tower beyond. The main brick built form of the power station is concealed behind Chelsea Wharf and adjacent buildings. The riverbank is populated by houseboats on the RBKC (right hand) side of the river, and it is largely under utilised as a public resource: there is no public riverside link between Cheyne Walk and the Chelsea Harbour Thames Path. The River Thames and the open sky dominate this view, which extends upstream along Battersea Reach to the distant level horizon beyond.





**Proposed**

**1.15**

The proposed towers would apparently step up in height from the chimneys of the power station, the taller tower (HF1) would establish a mid-point between Montevetro and World's End, and with KC1 would provide a dramatic new landmark on this broad bend of the River Thames. The coloration of the proposed towers would be more neutral than the terracotta and dark steel of Montevetro and the dark brown brick of World's End. The proposed housing blocks at their bases would have heights comparable to the residential components of Chelsea Harbour and Imperial Wharf beyond, and of Chelsea Wharf in the foreground. The public realm around the base of the proposed towers would be well landscaped, and the new planting would positively reinforce the natural character of the River edge.

**Significance of Impact:**

Beneficial, substantial, and district.



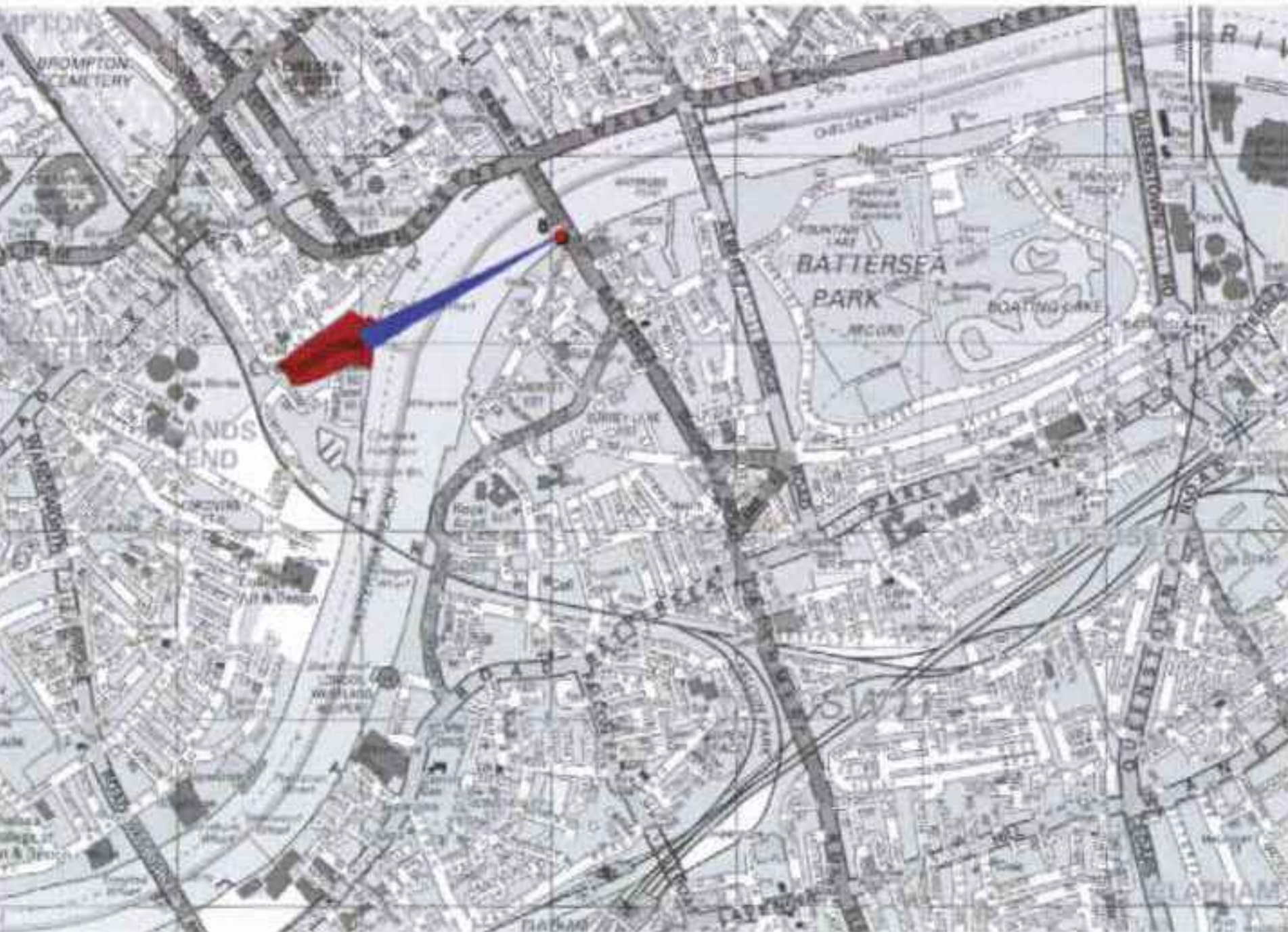


View CP8. South end of Battersea Bridge

Existing

1.16

This is a similar to view CP7, but is taken from a position further south. The skyline is punctuated by Montevetro, Chelsea Harbour Belvedere Tower, Lots Road chimneys (seen here issuing smoke) and the World's End Estate. Water and sky dominate the view.





**Proposed****1.17**

The proposed towers would apparently step up in height from the chimneys of the former power station, the taller tower (HF1) establishing a mid-point between Montevetro and World's End, and providing the River with a dramatic new landmark. The proposed housing blocks would have heights comparable to the residential components of Chelsea Harbour, and of Chelsea Wharf, positively reinforcing the River edge. From this lower datum of built form a series of towers – Chelsea Harbour Belvedere Tower, HF1 and KC1, and World's End – would rise skyward, feathering the boundary between sky and water and enhancing the riverscape.

**Significance of Impact:**

Beneficial, substantial and district.



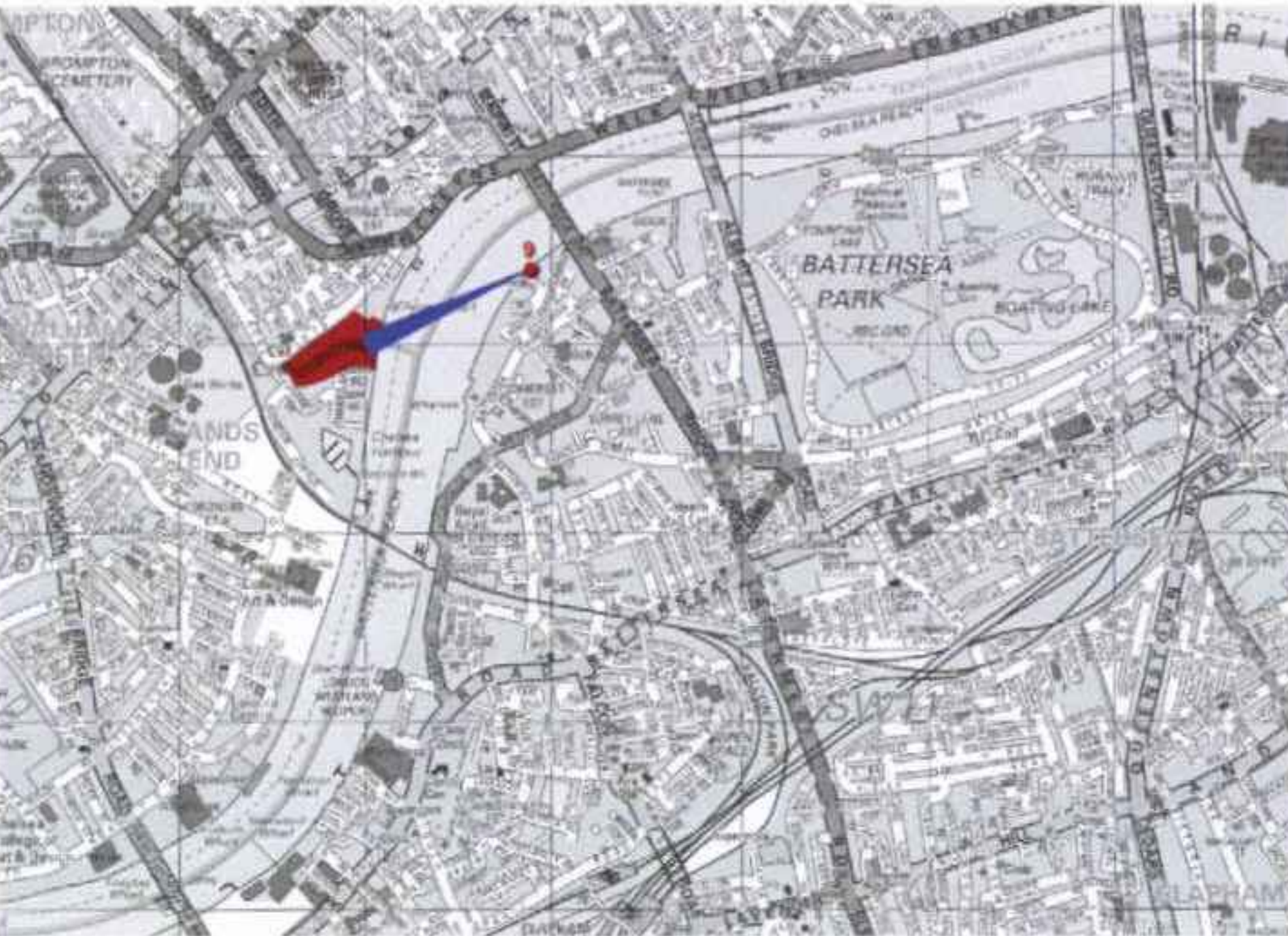


View CP9. Wandsworth Riverside Walk (1)

Existing

1.18

This view provides an oblique view of the southern elevation of the power station and the opening of Chelsea Creek adjacent to it. Chelsea Harbour and World's End residential developments frame the edges of the view: there is an apparent continuity in heights of the primary built form, which is interrupted by unbuilt open space (between Chelsea Wharf and World's End), the horizontal brick bulk of the power station, and its vertical chimneys (seen smoking in this view).





**Proposed****1.19**

The proposed residential towers would flank the entrance to Chelsea Creek. The lower tower KC1 would conceal the chimneys of the former power station but would have a similar apparent scale. The high quality materials and details of the proposed towers would be visible from here: the brick cylinders that comprise the chimneys would be substituted by a more neutral coloured glass and steel, which would be clearly articulated by balconies and apartments (see CP10 below). The proposed housing blocks would obscure much of the Chelsea Harbour development in this view, and would have heights comparable to the former Wharf buildings. The proposed massing of built form and the well landscaped public realm along the river frontage would positively reinforce this stretch of the Thames.

**Significance of Impact:**

Beneficial, substantial, and local



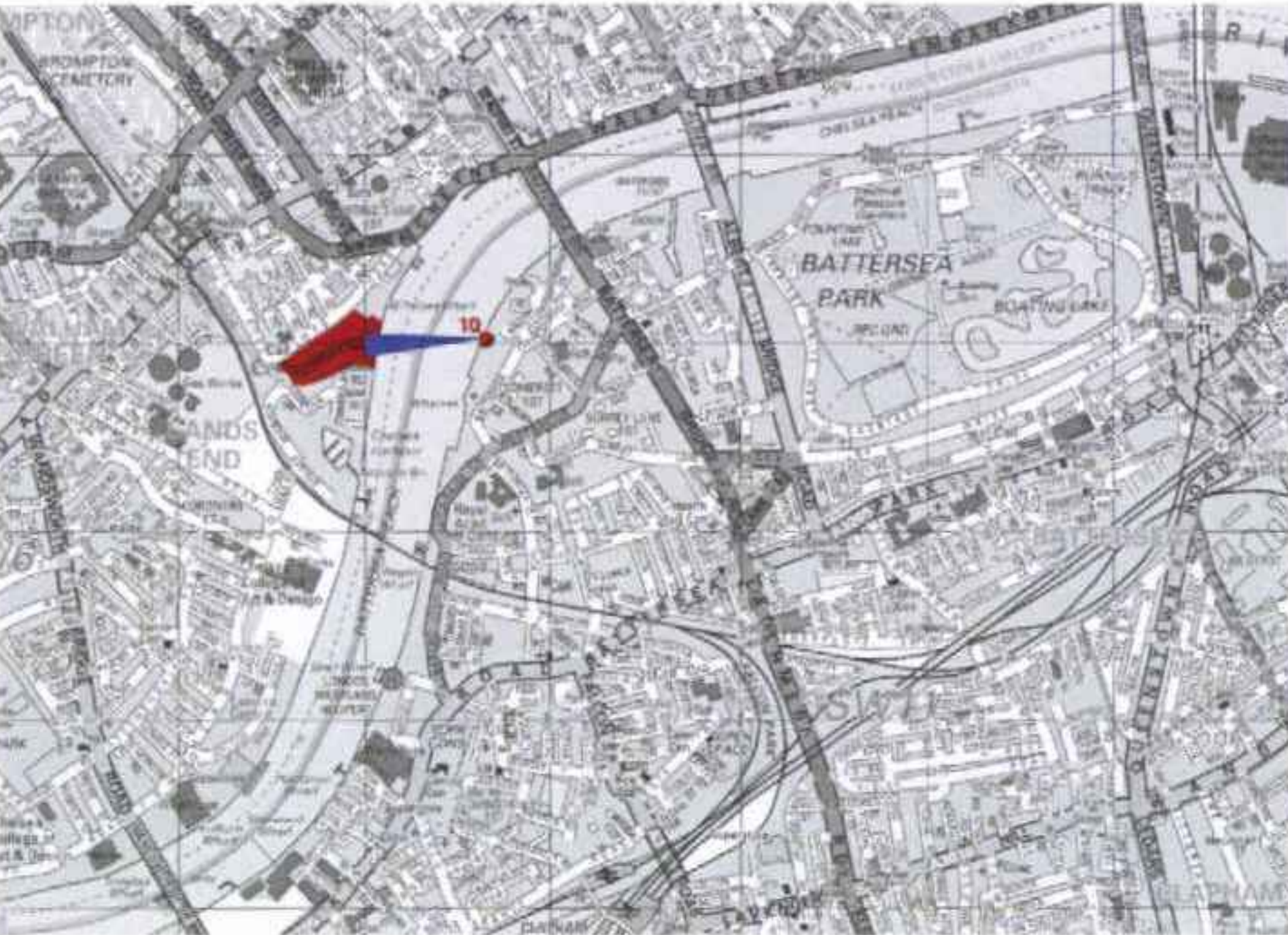


View CP10. Wandsworth Riverside Walk (2)

Existing

1.20

This is a similar view to CP9, except that more of the southern elevation of the power station is visible. Built form creates a narrow band of buildings of mostly undistinguished quality between water and sky, a formality that is relieved only by the geometrical simplicity and elegance of the Lots Road power station chimneys.





**Proposed****1.21**

The proposed towers would flank the entrance to Chelsea Creek, and frame the chimneys and main form of the former power station. They would have a similar long axis alignment with the power station, which would appear to address the downstream views on and beyond Chelsea Reach (as described in the views above). Their high quality materials and details would be visible from this distance across the Thames on the Wandsworth Riverside Walk. The southern brick elevation of the power station would be opened up by new windows, which would accentuate the rhythm of the arced brickwork at eaves level. The power station would have a new glass roof, reflecting the sky. The proposed housing blocks at the base of the towers would have heights comparable to the former Wharf buildings, positively reinforcing the continuity of built form along the river edge, while the proposed towers would appear to feather this ribbon of form into the sky. The riverside public realm would be enhanced by the proposed landscaping and animated by the movement of pedestrians as they progress along the river edge and cross the new pedestrian bridges over Chelsea Creek.

**Significance of Impact:**

Beneficial, substantial, and local



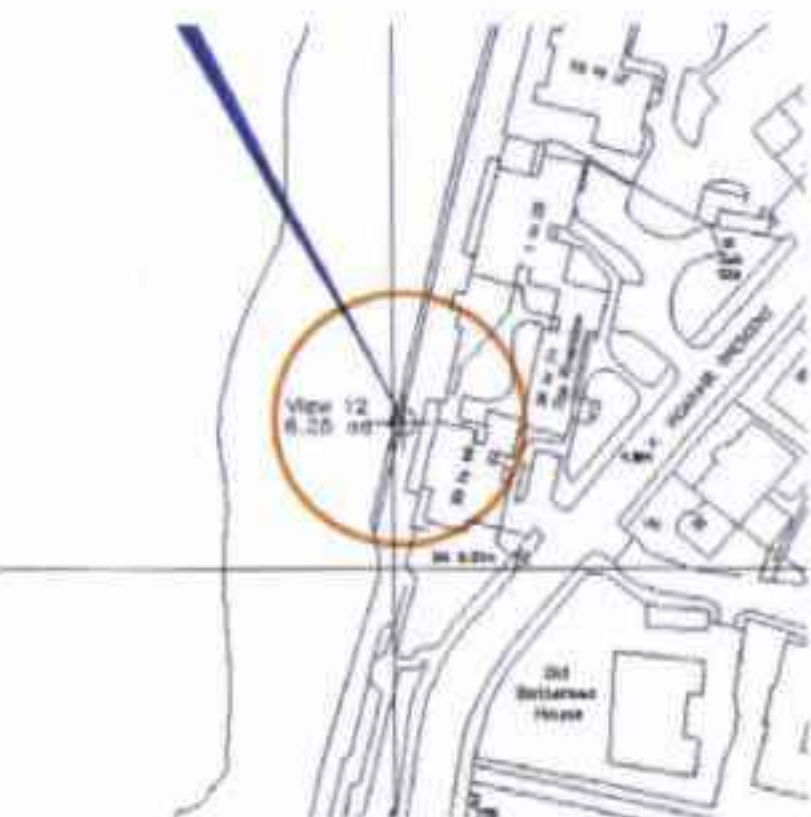


View CP12. Riverside by Vicarage Crescent, Battersea

Existing

1.22

Approximately half of the southern elevation of the power station is obscured by the existing Chelsea Harbour buildings. The skyline is already punctuated by Chelsea Harbour Belvedere Tower (on the far left) and the surviving chimneys of Lots Road power station. The continuity of built form is broken to the right of the power station by under developed land: urbanistically, the World's End Estate and Chelsea Wharf (in its foreground) appear physically disconnected from Chelsea Harbour and the river frontage has a fragmented and neglected appearance.





**Proposed****1.23**

The proposed housing blocks would have heights comparable to the residential components of Chelsea Harbour. While they would conceal the main form of the former power station they would positively reinforce the River edge. The proposed towers would form a paired composition, appearing to be angled towards each other with HF1 angled away from the chimneys of the power station, and KC1 from the Thames and World's End. They would appear no taller than Chelsea Harbour Belvedere, and KC1 would appear to relate the height of World's End to the greater height of HF1. The proposed towers would add positively to the scene through their use of high quality forms and materials, and would plug the physical gap in the existing riverside development. They would create a new residential landmark comparable in impact to Chelsea Harbour Belvedere Tower.

**Significance of Impact:**

Beneficial, substantial, and local



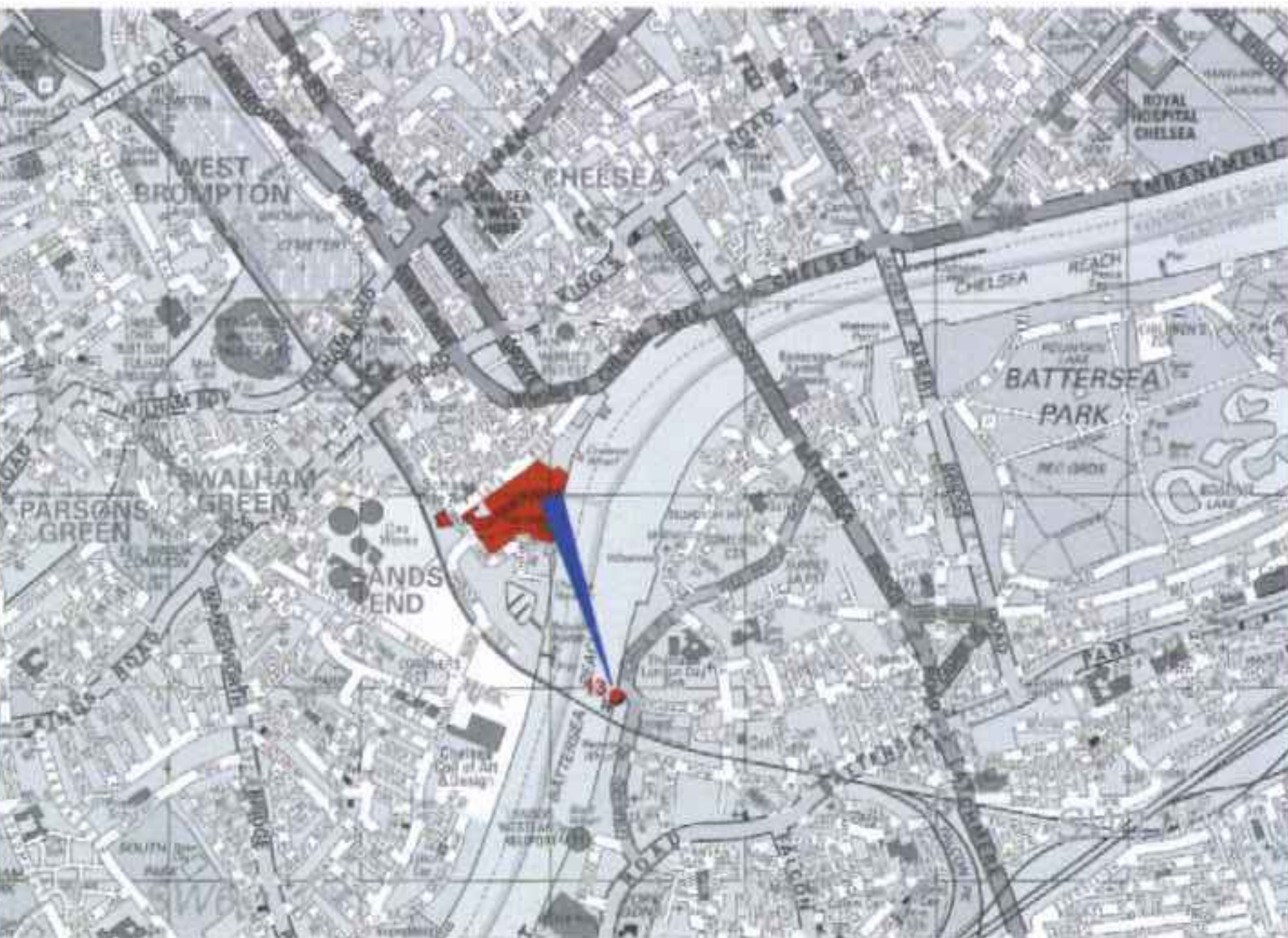
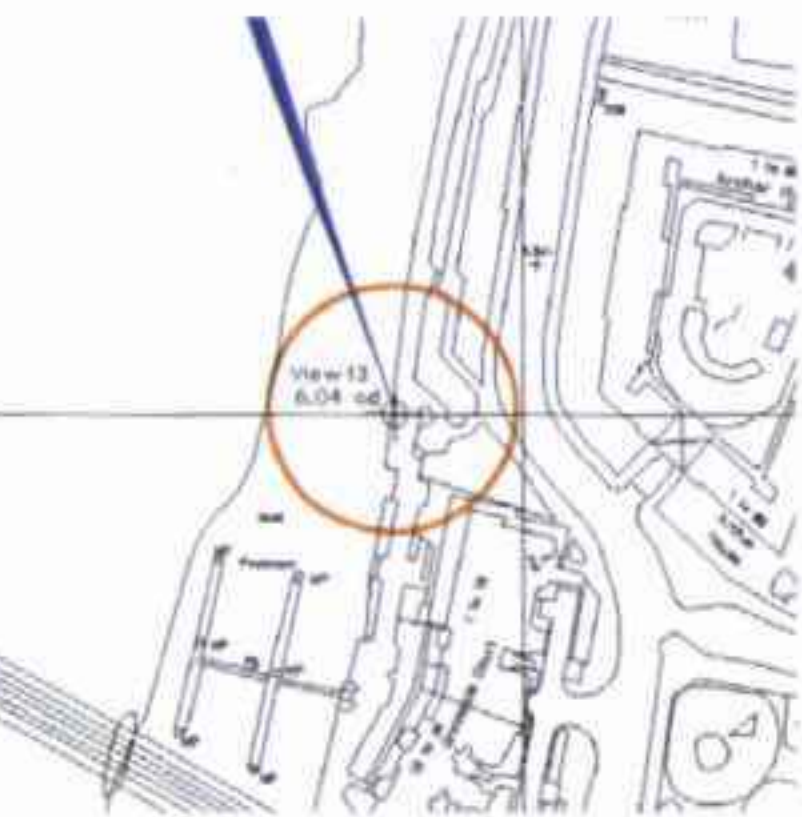


View CP13. Wandsworth end of Battersea Rail Bridge  
outside Graveside Walk

Existing

1.24

The *Thames Strategy* study (April 1995) [CD 284: p. 50] used this viewpoint to reinforce the notion that “parallel alignment reinforces the river as a linear space”, believing it to be desirable to “define the river edge by buildings” set orthogonally to the River Thames. This was a curious illustration for them to use, as only the Chelsea Harbour terrace with its four white triangular pedimented roofs is set parallel to the River, all else is placed at an angle. The same document identifies Chelsea Harbour Belvedere Tower as “an important contemporary landmark”, an opinion that is restated in the more recent *Thames Strategy - Kew to Chelsea* (June 2002) [CD 226: p. 4.87]. This document also affirms that the “two chimneys of the power station are an important landmark.” [CD 226: p. 4.87]





**Proposed****1.25**

The proposed housing blocks would have heights comparable to the residential components of Chelsea Harbour, concealing the main form of the former power station, but leaving its surviving chimneys highly visible. The proposed towers would form a paired composition (more closely twinned than in view CP12), appearing to be angled towards each other, and away from the chimneys of the power station (HF1), and the Thames and World's End (KC1). They would appear no taller than Chelsea Harbour Belvedere "an important contemporary landmark" (Thames Strategy Study, April 1995), and would add positively to the scene, visually linking World's End with Chelsea Harbour and consequently reinforcing and enhancing the River edge

**Significance of Impact:**

Beneficial, substantial and local



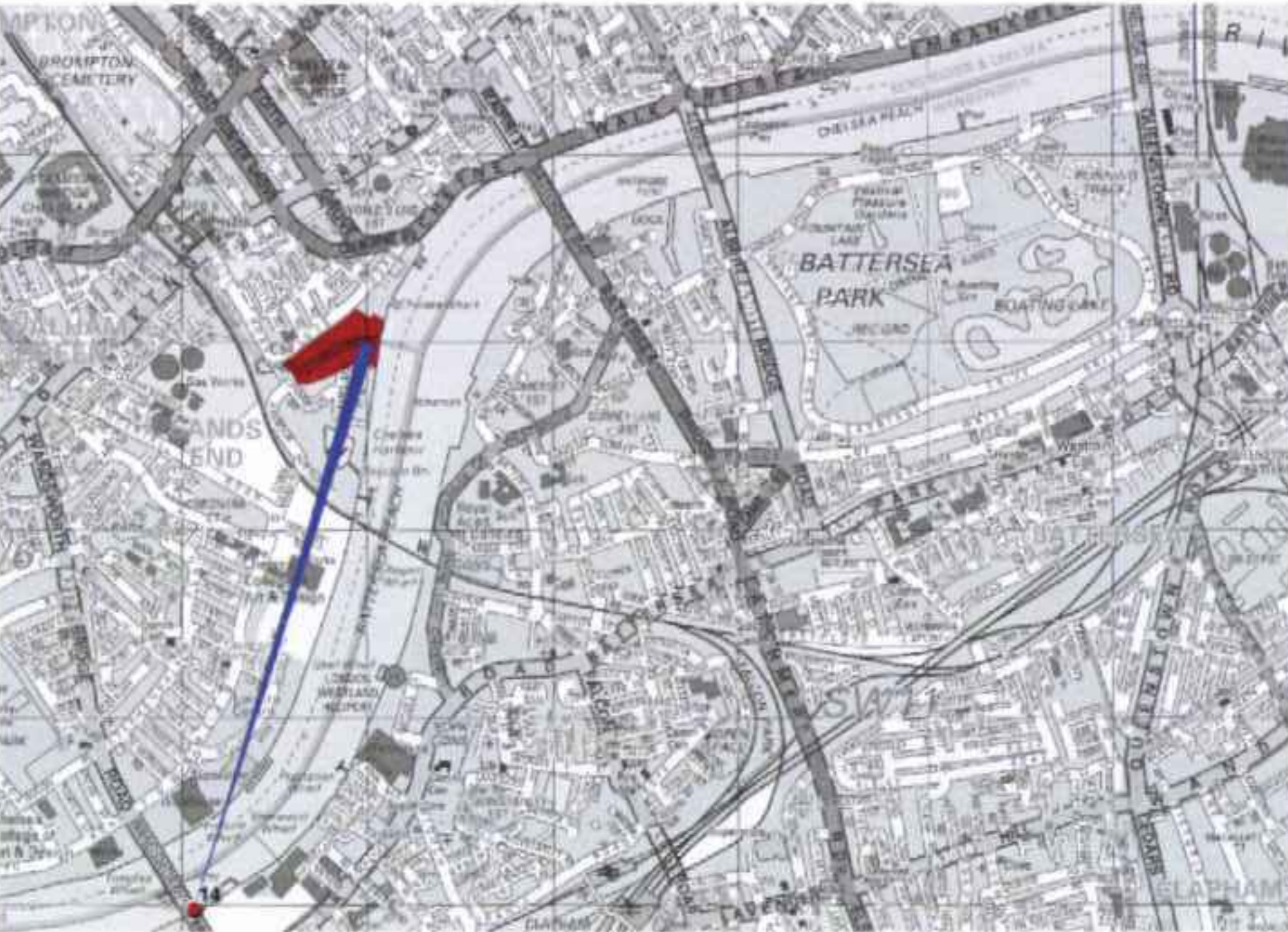


View CP14. Southern end of Wandsworth Bridge

Existing

1.26

Only the tops of the Lots Road power station chimneys (seen smoking here) are visible from Wandsworth Bridge: Chelsea Harbour Belvedere Tower is a distinctive landmark, but only its top is visible since the completion of Imperial Wharf (completed after this photograph was taken). The red brick lumpen form of the eight-storey residential apartments at Regent on the River (immediately to the right of the Belvedere) defines the inner bend of the River. On the opposite bank in the far distance is Montevetro and the adjacent LCC housing blocks of Wandsworth. Although this view crosses the length of Sands End Riverside Conservation Area, in visual and riverscape terms it is low in quality.





**Proposed****1.27**

The proposed towers would be distant objects beyond the Sands End Riverside Conservation Area: Imperial Wharf would conceal their lower portion. The proposed towers would add to the skyline interest previously provided only by the former power station chimneys and Chelsea Harbour Belvedere Tower, creating a mini-cluster of taller structures on the horizon. Across the Thames from Montevetro, they would signal the higher quality residential development that starts further down stream.

**Significance of Impact:**

Beneficial, minor and district.



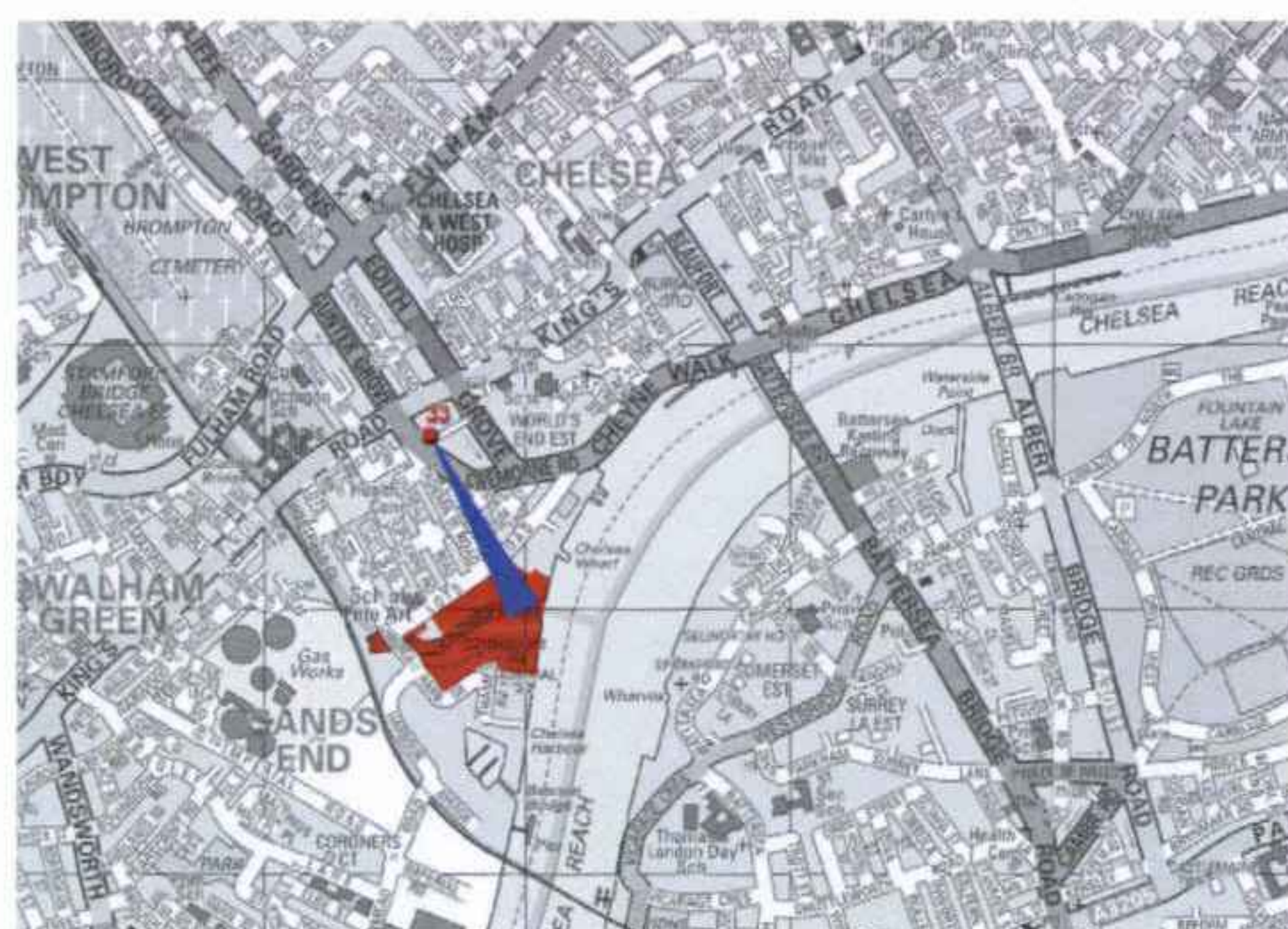


**View CP33. Western pavement of Ashburnham Road  
in line with Tadema Road**

**Existing**

1.28

This is a view south-southeast down the A3220 at Ashburnham Road (between Gunter Grove to the north and Cremorne Road to the south), which is flanked in the middle distance on the right by Victorian terraced housing. The Lots Road chimneys rise from the rear of the strongly horizontal mass of the power station in front of them, and punctuate the skyline with their slender cylindrical brick form. In between the power station and the housing to the left of the view the townscape loses height and character - the canopy of a petrol filling station occupies the middle view.





**Proposed****1.29**

The proposed residential towers would provide a new conclusion to this vista: they would have well-modelled forms apparently of a comparable height to the chimneys of the power station. While the chimneys are evocative of power and industry and are built of basic materials, the proposed residential towers would be constructed of high quality glass and steel. The individual balconies that articulate their profiles would provide them with a human scale, which the power station lacks. The new glass roof to the power station would add visual interest and a new transparency, relieving its solid mass and creating a visual link with the contemporary materials of the proposed towers.

**Significance of Impact:**

Beneficial, substantial and local.





View CP36. Tadema Road

Existing

1.30

This viewpoint is taken to the west of the view at CP33, at the top of Tadema Road. The street is one of considerable contrast, with a long Victorian terrace terminated by the eastern end and chimney of Lots road power station (from which smoke can be seen rising - and from the chimney out of shot on the right). On the far left is the forecourt of a petrol filling station, and beyond the characterless back of a modern residential block.





**Proposed****1.31**

The proposed residential towers would provide a new conclusion to the vista down Tadema Road. Their well-modelled forms would appear to have heights similar to the chimneys of the power station. Their high quality materials and details would be visible, as would the glazing opening up the roof of the former power station. New publicly accessible pedestrian routes would be created through the power station accessible to all. The proposed towers and pedestrian routes would add human scale to the scene and make symbolic as well as real physical connections with the River Thames beyond.

**Significance of Impact:**

Beneficial, substantial and local.



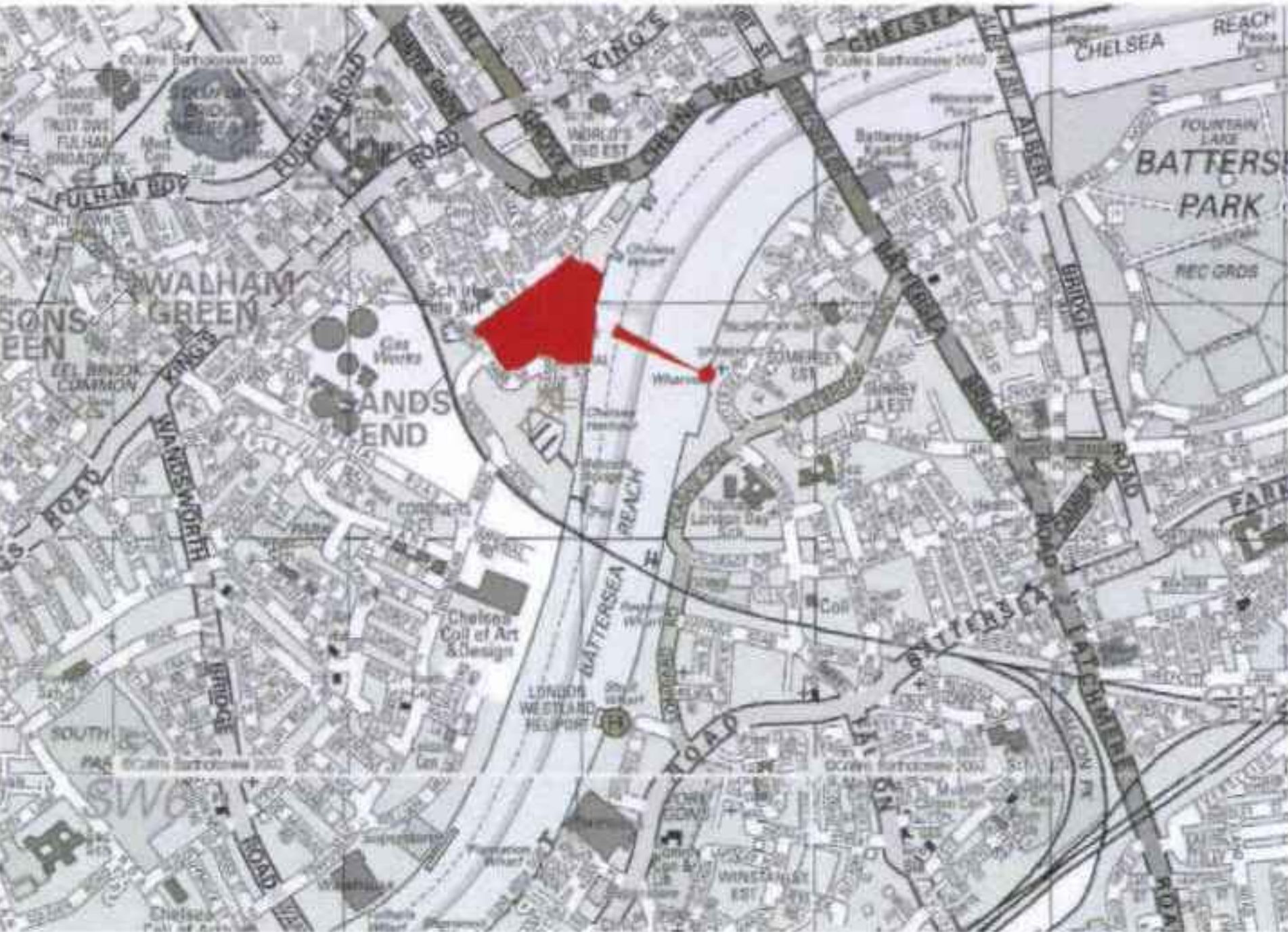


View RT1. St Mary's Churchyard, Battersea (panorama)

Existing

1.32

This is one of three views that were taken along the Embankment footpath of Battersea Reach, which complement the sequence of views already provided in the Environmental Statement. This view is taken from the same position as CP11 in Appendix C1 of the Updated 2004 ES [CD 58], and the original appraisal provided there remains valid. However, this more recent view is supplemented with a panorama (located on the following page) that takes in more of the urban and riverside context. The view of Chelsea Harbour includes the landmark Belvedere Tower on the far left, and on the right can be seen Chelsea Wharf and four of the residential towers that constitute World's End.





**Proposed**

**1.33**

The two towers are 37 storeys high (HF1 - on the left), and 25 storeys (KC1 - to the right); HF1 would appear between the brick chimneys of the power station in this view. Although much of the form of the power station (KC3) would be obscured by the proposed development, its extent would remain discernible: much of its roof and its gabled ends would be visible, as would part of its elevation against the Creek. The rendered forms of the proposed development in this image explain more completely the relationship of its physical elements, one to another. It is evident that - with the lower residential buildings distributed around their base - they would contribute very positively to the urban and riverside scene.

**1.34**

The proposed towers would form a balanced composition against the river, and they would rise from a horizontal band of building against the waterfront that - to left and right of the development site - is already punctuated by the Belvedere Tower, the power station chimneys and World's End. The proposed Lots Road towers would complement this existing cluster of taller buildings and forms. The solid brick chimneys, heavy forms of the World's End housing, and the Belvedere Tower with its copper pagoda-like roof would be viewed in contrast to the relatively transparent and reflective skin of the proposed residential towers. This successful visual composition, which would combine an industrial past with a residential present and future, would benefit substantially the urban and riverside scene.

**Significance of impact:**

Beneficial, substantial and local.



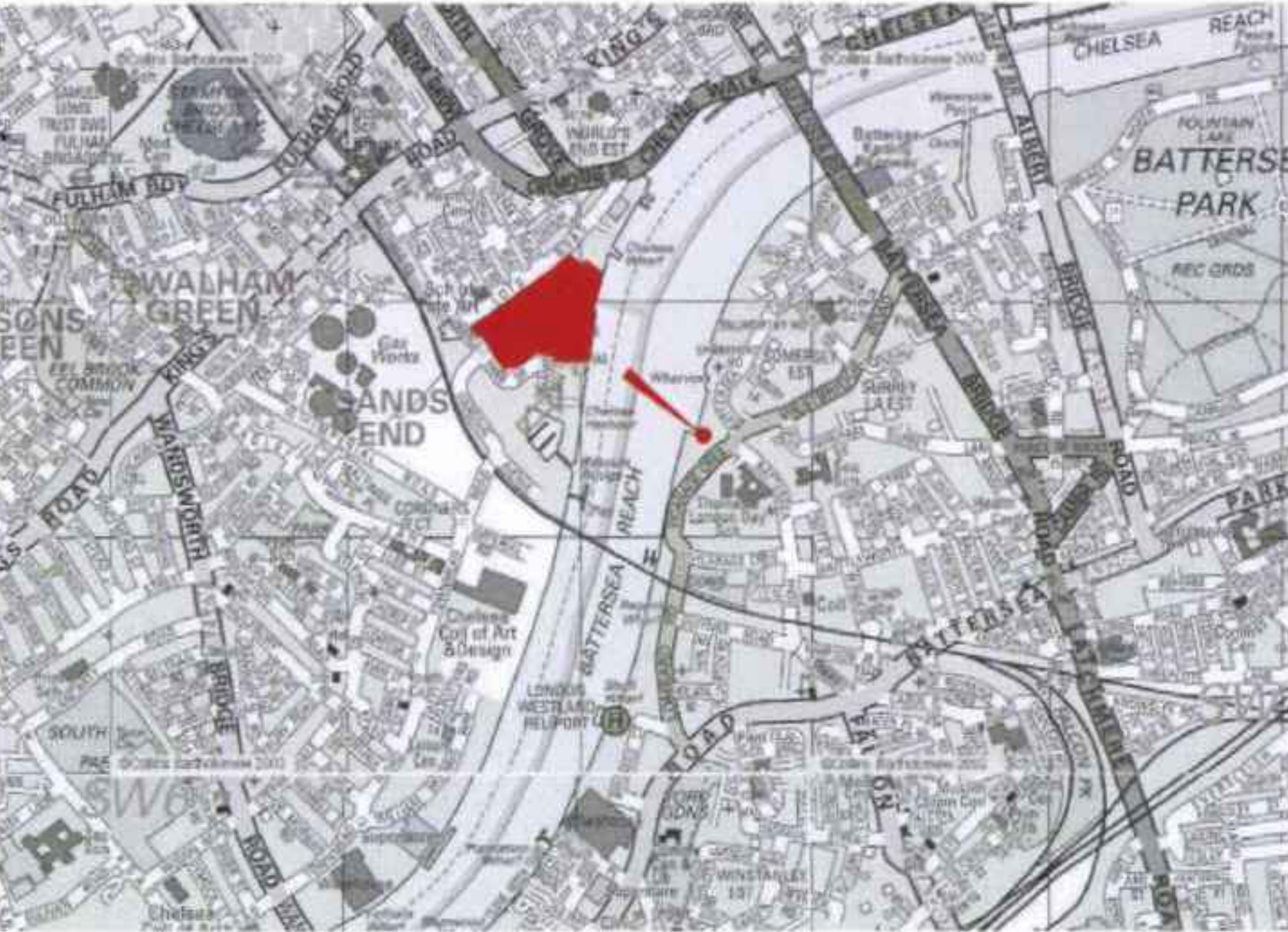


View RT2. Old Swan Wharf (panorama)

Existing

1.35

Located between CP11 and CP12 in Appendix C1 of the Updated 2004 ES [CD58], this view demonstrates more clearly the physical context of the former power station in relation to the towers of the adjacent World's End Estate, and of Montevetro and St Mary's Church (immediately to the right but out of shot) on the southern bank. The view comprises distinctly separate elements that currently lack positive visual connections between them: the power station is separated from World's End by a low horizon, and stands aloof from that housing estate and Montevetro.





**Proposed****1.36**

In view RT3 below, it will be noted that the angled tops of the proposed towers create a powerful visual link with the chimneys of the power station. Here, the lower of the two proposed blocks (KC1) would provide the missing link between the power station and the residential towers of World's End: apparently stepping up from their height to the tallest tower in view (HF1). In turn, the top of HF1 would angle down to a visible chimney of Lots Road: a pleasing cluster of forms would be created. The angled tops of the proposed towers would complement the angled form of Montevetro (out of shot) across the Thames. The lower buildings proposed at the bases of the towers would link in height with neighbouring developments. A broad band of landscaping - particularly of trees - would provide a firm base against the river, through and above which buildings would rise. Overall, a somewhat bleak existing riverscape would be transformed into a place that people would wish to visit and enjoy. The north and south banks would become balanced elements of a broad composition of buildings and landscape lining the river: the Thames would be enhanced.

**Significance of impact:**

Beneficial, substantial and local.





View RT3. Plantation Wharf Quayside

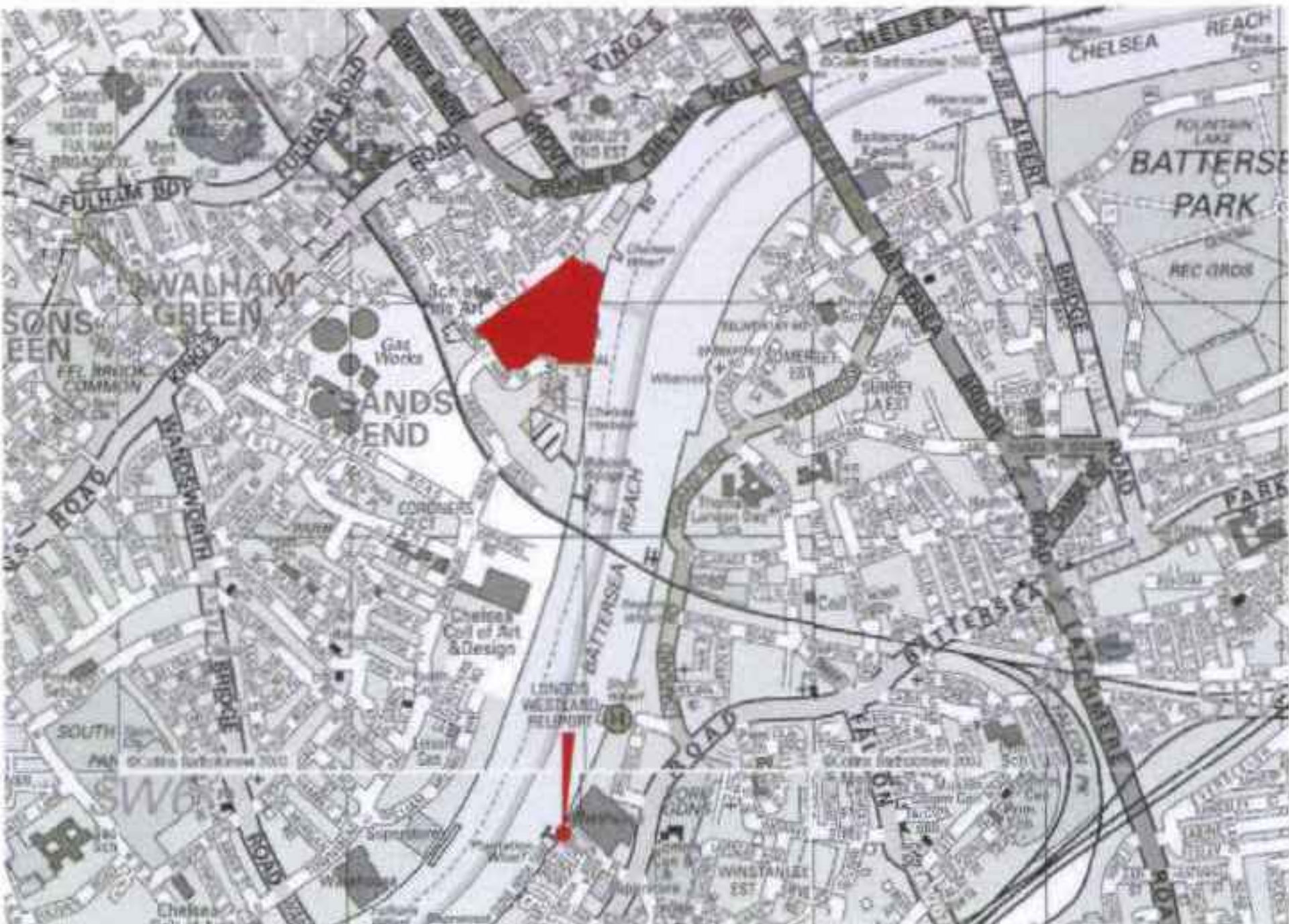
Existing

1.37

This view is from a quayside that has only recently been made accessible to the public, and supplements CP13, which appeared in Appendix C1 of the Updated 2004 ES [CD 58]. A major residential development, Plantation Wharf, now lies behind this viewpoint and enjoys these northerly views down the Thames. Immediately ahead and to the right is London Westland Heliport, beyond which rises Montevetro. Across the river is a dense cluster of residential buildings: the new, almost completed Imperial Wharf, with its roofs gently curving towards the Thames, and the landmark pagoda-like form of Chelsea Harbour's Belvedere Tower.

1.38

The chimney of the former Lots Road power station can be seen rising beyond the lowest stepped roof of Imperial Wharf. To the left of Imperial Wharf is new open space; the World's End towers are visible to the right of Chelsea Harbour rising above the horizontal datum provided by the railway bridge over Battersea Reach. Distinctive distant high buildings - the white crown-like top of the Victorian and Albert Museum, and Sir Basil Spence's Wellington Barracks tower near Buckingham Palace - are discernible on the horizon above the railway bridge.





**Proposed****1.39**

The proposed Lots Road towers would overlap in this view: the complete upper profile of HF1 would be visible, but only part of KC1, which would appear to visually 'buttress' the taller building. Their angled tops would step up and away from the Belvedere Tower and World's End, and their different heights would be resolved through their combination. Montevetro would appear to step towards this cluster of taller buildings on the opposite bank, of which the proposed Lots Road towers would form the apex. While tall, the Lots Road towers would cut an appropriately scaled profile on the horizon, which would be compatible to the surrounding buildings and the broad sweep of the Thames at this point. The proposed towers would provide a distinctive landmark alongside the Belvedere Tower and chimney of the former power station enhancing the riverside.

**Significance of impact:**

Beneficial, substantial and district.





View RT4. Cheyne Walk/Milman's Street

Existing

1.40

This southwesterly view up the River Thames towards Wandsworth Bridge extends southward the Cheyne Walk viewing sequence that links Chelsea Embankment with Albert and Battersea Bridges. In the foreground are numerous boathouses, each expressed individually through a range of colours and forms. They have been a long-term feature of the embankment immediately west and upstream of Battersea Bridge, and add to the character of the urban scene. Their variety and informality contrasts with the varying forms on the horizon of an array of more substantial residential accommodation across and along both sides of the Thames (from left to right): a 1960s housing block on the Somerset Estate; the precise glass and steel engineering of Richard Rogers Partnership's Montevetro housing; Regent Wharf and Plantation Wharf; and on the north bank, Imperial Wharf and Chelsea Harbour. The numerous distant tower cranes in profile against the skyline indicate that the riverside zone remains a major construction zone.

1.41

Focussing the view along the upstream course of the Thames, the diminutive and slender form of the steeple of St Mary's Church - Battersea's only Grade I listed church - gently lifts the eye from the datum of roofs that forms the horizon, up to Montevetro. Montevetro housing is unlike any other recent development in view. It climbs up towards the river as a solid triangle of glass, and its truncated rectangular end faces this view. To its left is the geometrical - somewhat lumpen - mass of the 1960s housing block. Montevetro and St Mary's Church, two buildings of real architectural distinction, provide a memorable, combined pivot point at this bend of the Thames.

1.42

To the right, on the northern bank, is the white flank wall of Chelsea Wharf, and beyond that the brick cylindrical chimneys of Lots Road power station. These structures are reminders of the industry that once thrived along this section of the river. As industry has receded and the water quality of the riverside environment improved, people have been drawn to the river as a place to live and play. The residential developments of Chelsea Harbour and Imperial Wharf lie beyond. They provide a modern horizontal edge to the Thames, which is relieved only by the verticality of Chelsea Harbour's Belvedere Tower and the chimneys of the former power station.





**Proposed****1.43**

The paired towers would provide an appropriate visual response to Montevetro across the Thames. Much as Montevetro and St Mary's provide a convincing coupling of forms on the tight bend of the River, and Montevetro steps up from the church steeple, the Lots Road towers would balance the chimneys and Belvedere on the northern bank, providing this broad sweep of the River with an appropriate emphasis and scale.

**1.44**

The stepped height of the proposed towers would appear to extend the heights of the Lot Road chimneys upwards, creating a visual link with the landmark buildings on the opposite bend of the Thames. Their angled tops would reduce the uppermost mass of their form, creating points on the skyline rather than flat tops. Through its opposing angle, the lower tower (KC1) would relate the progression of built form back down to the buildings proposed at their base.

**1.45**

The proposed towers would appear well proportioned in this view, having width-to-height ratios compatible with the silhouettes of Montevetro, the Belvedere and the Lots Road chimneys. Their curved profiles would also echo the cylindrical character of the chimneys and would similarly cut elegant skyline silhouettes. Consequently, the riverside would have a varied skyline profile and a variety of form and materials - of brick, glass and steel - which would serve to animate the scene, providing visually interesting reflections in the water. The riverside would be enhanced. The proposed towers would be well assimilated into their context by the solidity of the existing Chelsea Wharf and the lower housing elements proposed around their bases.

**Significance of impact:**

Beneficial, substantial and local.





View RT5. Cheyne Walk/ World's End

Existing

1.46

This view describes the northern entrance to Lots Road from Cremorne Road and Cheyne Walk. In the foreground, an advertising hoarding and a three-storey red brick end of terrace dwelling flank Lots Road. The axis of Lots Road focuses on the former power station, and its two redundant chimneys punctuate the skyline. Behind the hoarding is the sidewall of the Chelsea Wharf building. The image presented is of a lost and decaying past, and a place in transition: the advertising hoarding suggests that it is an area awaiting a new urban identity.





**Proposed****1.47**

The proposed towers would read clearly as new insertions into the urban scene. It would be clear from moving along Cheyne Walk that they relate primarily to the river's edge, and would complement that realm. In this view, their joined configuration would be such that – Janus-like – they would appear to look both ways: with HF1 addressing the Thames and KC1 the former power station. They would appear to be in proportion to the height of the power station chimneys. The proposed towers would signal the changing character of this locality, from one dominated by river-related industry, to one that has become firmly residential.

**Significance of impact:**

Beneficial, moderate and local.





View RT6. Cremorne Gardens Pier

Existing

1.48

This view is supplementary to CP30 in Appendix C1 of the Updated 2004 ES [CD 58], which - as is stated in the related commentary - does not permit a full appreciation to be made of the proposed Lots Road residential towers, nor of Montevetro across the Thames. The view currently lacks balance: redundant warehouses on the right (including the foreground Chelsea Wharf building) and the imposing landmark of Montevetro on the southern bank of the Thames. It is arguable that the northern bank, with its longer sweep of riverside, should be the dominant side urbanistically. However, Lots Road power station has long dominated this area and has precluded the establishment of a more complex physical relationship with the riverside.





Proposed

1.49

The proposed towers would add considerably to this view of the riversides of the Thames. Their architectural qualities would be easy to read from here: their strong vertical emphasis, the three-dimensional profiles of the exposed balconies on their leading and receding edges, and the relative transparency of their sloping tops. They would be the most elegant buildings in view. They would enhance the riverside as well as the setting of the existing buildings, providing points of comparison against which Montevetro, Belvedere Tower and Chelsea Wharf would be read.

Significance of impact:

Beneficial, substantial and local.





View RT7. Tadema Road near to Burnaby Street

Existing

1.50

This view is supplementary to CP32 in Appendix C1 of the Updated 2004 ES [CD 58], and is taken a few metres further north of the junction of Tadema Road and Burnaby Street and more centrally in the road. It conveys more clearly the domestic scale of the street enclosure that the existing terraced housing creates, and the visual presence of the former power station, which - when it was fully operational and belched smoke from its original four chimneys - dominated the local community and its physical environment. Now it stands silently as a benign, inoffensive reminder of its days of activity: yet its chimneys still provide a prominent visual landmarks when negotiating the local streets.





**Proposed****1.51**

The proposed towers would have a separate architectural identity to the buildings that form the current urban scene, being predominantly of glass rather than brick. They would appear light and transparent, unlike the ground-hugging weight of masonry already in view. The proposed towers are of unequivocally contemporary design and have been conceived with different ambitions to the existing housing locally. Their accommodation is arranged vertically, rather than in the long horizontal terraces that characterise the existing Lots Road community, and they are designed to provide their inhabitants with views of the Thames, and of London beyond: a pleasure not afforded to the residents of the existing community. The towers would not detract from what exists here already, they would provide a high quality landmark and signal the expanse of the River Thames beyond. The roof of the power station would be transformed by a horizontal band of glass, which would connect that building visually to the proposed glass towers, and functionally through the proposed new residential usage.

**Significance of impact:**

Beneficial, substantial and local.



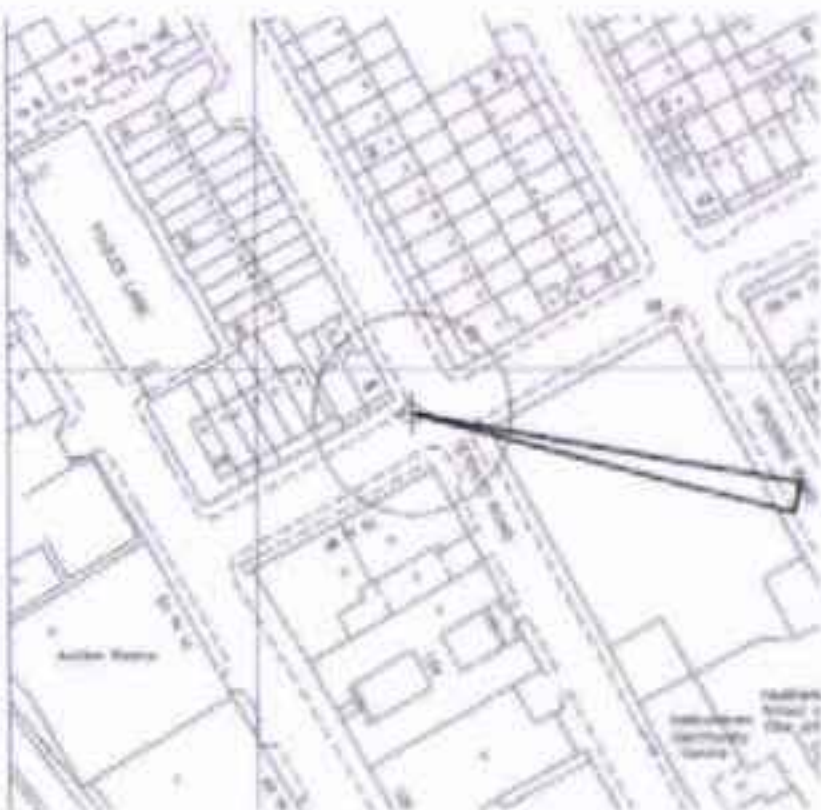


View RT8. Junction Burnaby Street and Tetcott Road

Existing

1.52

This is an unusually open view of the former power station for the surrounding community. Its entire length is visible, and it has a strong visual impact, which is emphasised because of the relatively low wall surrounding the foreground block. Brick is the predominant building material in view.





**Proposed****1.53**

Of the proposed towers only KC1 would be apparent in this view: HF1 would be positioned between the chimneys but its position is concealed by the foreground tree (and much of its form would in any case be concealed by the body of the power station). It may be possible to see both towers simultaneously from alternative positions close by. However, it is clear that they would be read as separate objects alongside the chimneys of the power station, which would remain the tallest structures in view. Also, the impact of the proposed towers would be less than if they were built of more solid materials: their glass skins would contrast with the predominant brickwork in view, and – depending on the prevailing lighting conditions – would almost appear to merge with the sky. Their impact on the setting of the community would be less than that of the former power station. Nonetheless, they would relate this locality to the River Thames beyond in a positive way, a relationship of land to river that is not otherwise apparent. The roof of the power station would be transformed by a horizontal band of glass. This would connect that building visually to the proposed glass towers, and functionally through its proposed new residential usage.

**Significance of impact:**

Beneficial, substantial and local.





View RT9. Marina in Chelsea Harbour

Existing

1.54

Chelsea Harbour is densely developed with buildings of 4, 5 and 9 storeys surrounding it: the Belvedere Tower is out of shot, to the right of this viewing position, and marks the inlet from the Thames. The brick chimneys of the power station rise high beyond the harbour confines, and one end of the power station can be seen between the buildings ahead. Its brickwork contrasts with the white walls of the buildings and boats in view. Even though the enclosing buildings are quite tall, and the quayside is set low, the chimneys exert a presence on Chelsea Harbour. However, their impact is not detrimental to the character of the place.





**Proposed****1.55**

Only the taller of the proposed towers (HF1) would be visible from this viewing position. However, the smaller tower (KC1) is likely to come into view when moving to a position further left. The top of HF1 would slope down towards the tops of the chimneys of the former power station and to the buildings enclosing Chelsea Harbour. It would have an elegant silhouette in this view. The glass skin of the tower would have a more neutral effect on this setting than the brickwork of the former power station, and the towers would have a minimal impact on Chelsea Harbour: the white walls of the enclosing buildings would remain dominant in this view. The new glazed roof to the power station, and the newly fenestrated southern elevation would provide a more positive urban conclusion to the vista between the existing residential buildings: it would also provide another destination for local residents, which would be approached through landscaped spaces and across the pedestrian bridges of Chelsea Creek.

**Significance of impact:**

Beneficial, moderate and local.



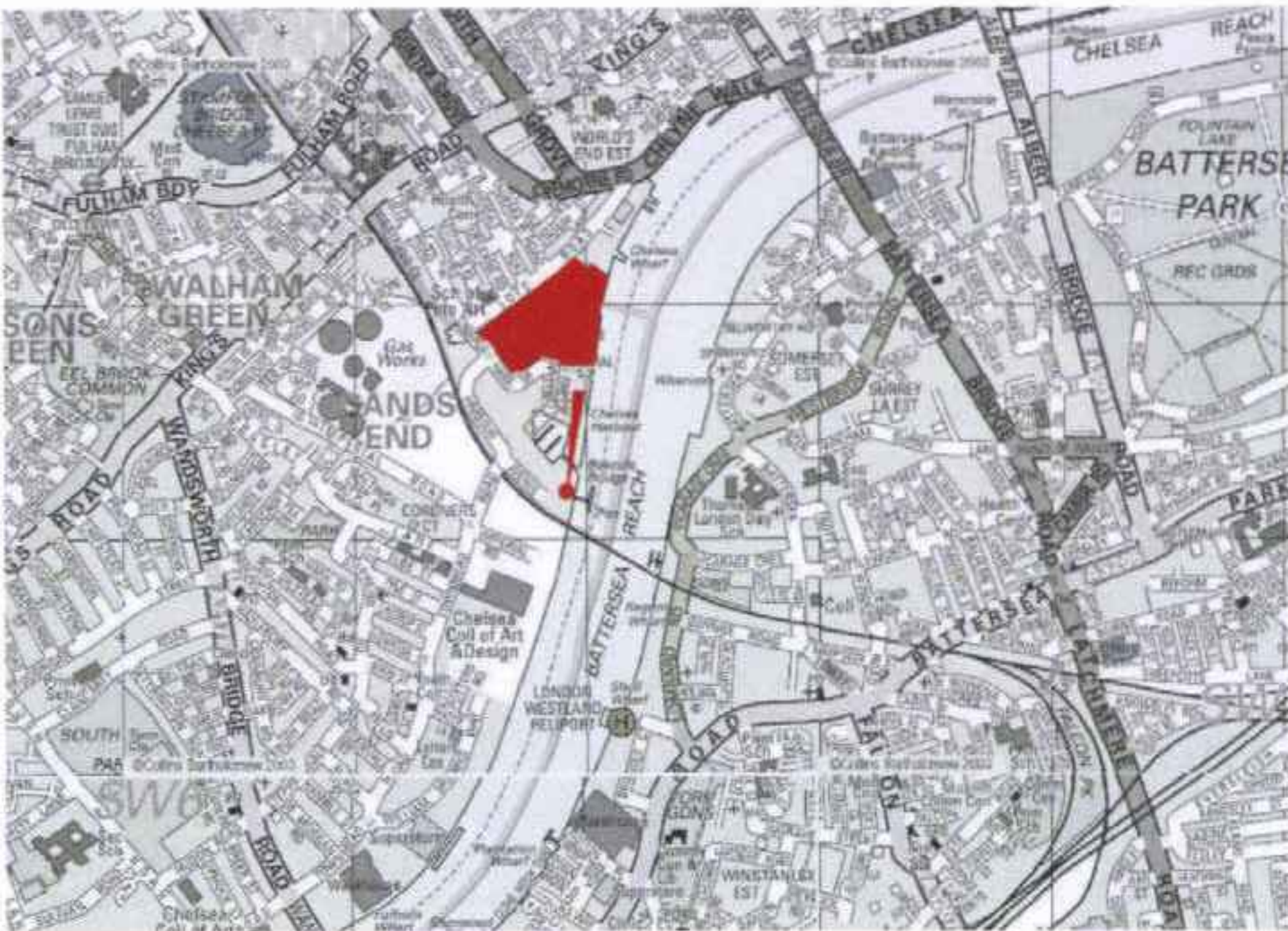
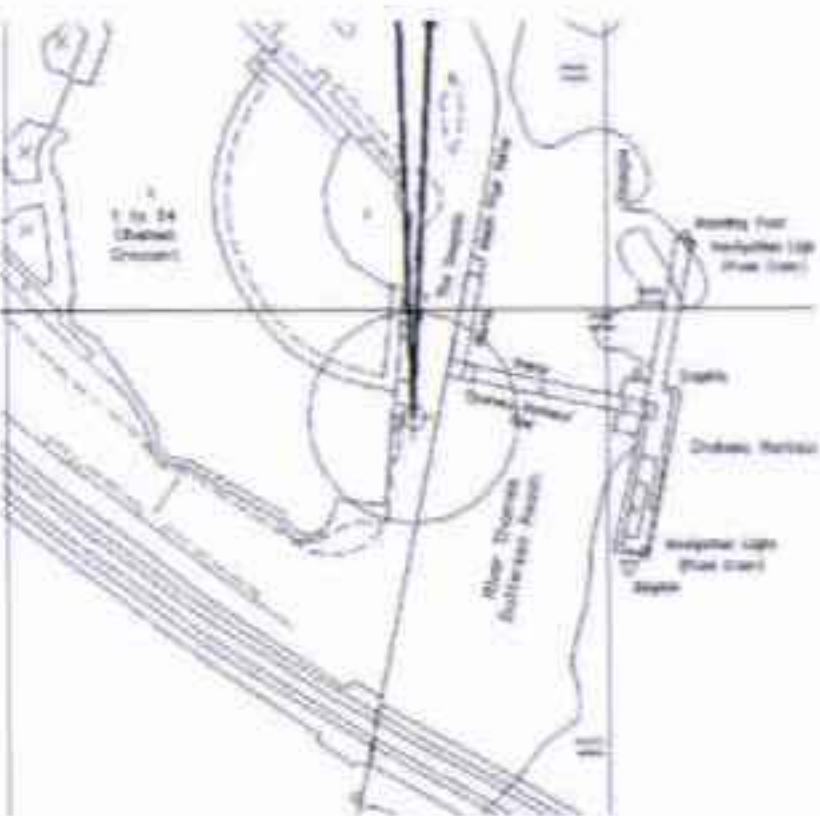


View RT10. Chelsea Harbour Pier/ Quayside

Existing

1.56

This is the northerly view at the northern end of the Sands End Riverside Conservation Area having emerged from under an arch of the railway viaduct at Battersea Reach and on arrival at the Chelsea Harbour Pier: the entrance to which is visible on the right. The view is framed by Belvedere Tower on the left and Montevetro on the right, with St Mary's Church in Montevetro's foreground. The distant horizon is attractively verdant and unequivocally urban: some of the residential towers of World's End are straight ahead and, in the distance to the right is Sir Basil Spence's Wellington Barrack's tower, and the Post Office Tower and Millbank Tower are visible further right still. A brick chimney of the former power station is visible on the left, beyond the Belvedere Tower.





**Proposed****1.57**

The taller of the proposed towers (HF1) would emerge from behind the existing riverside apartments: part of the lower tower (KC1) would be glimpsed behind it to its right. The sloping top of HF1 would relate its height to the adjacent power station chimney and apartment building rooftop. More powerfully, its angle would be read in conjunction with the longer pronounced slope of Montevetro on the Wandsworth bank of the Thames: their similar materials would strengthen this visual link. Together, they would suggest a gateway through which the river passes, making this a memorable, as well as an attractive riverside view.

**Significance of impact:**

Beneficial, moderate and local.



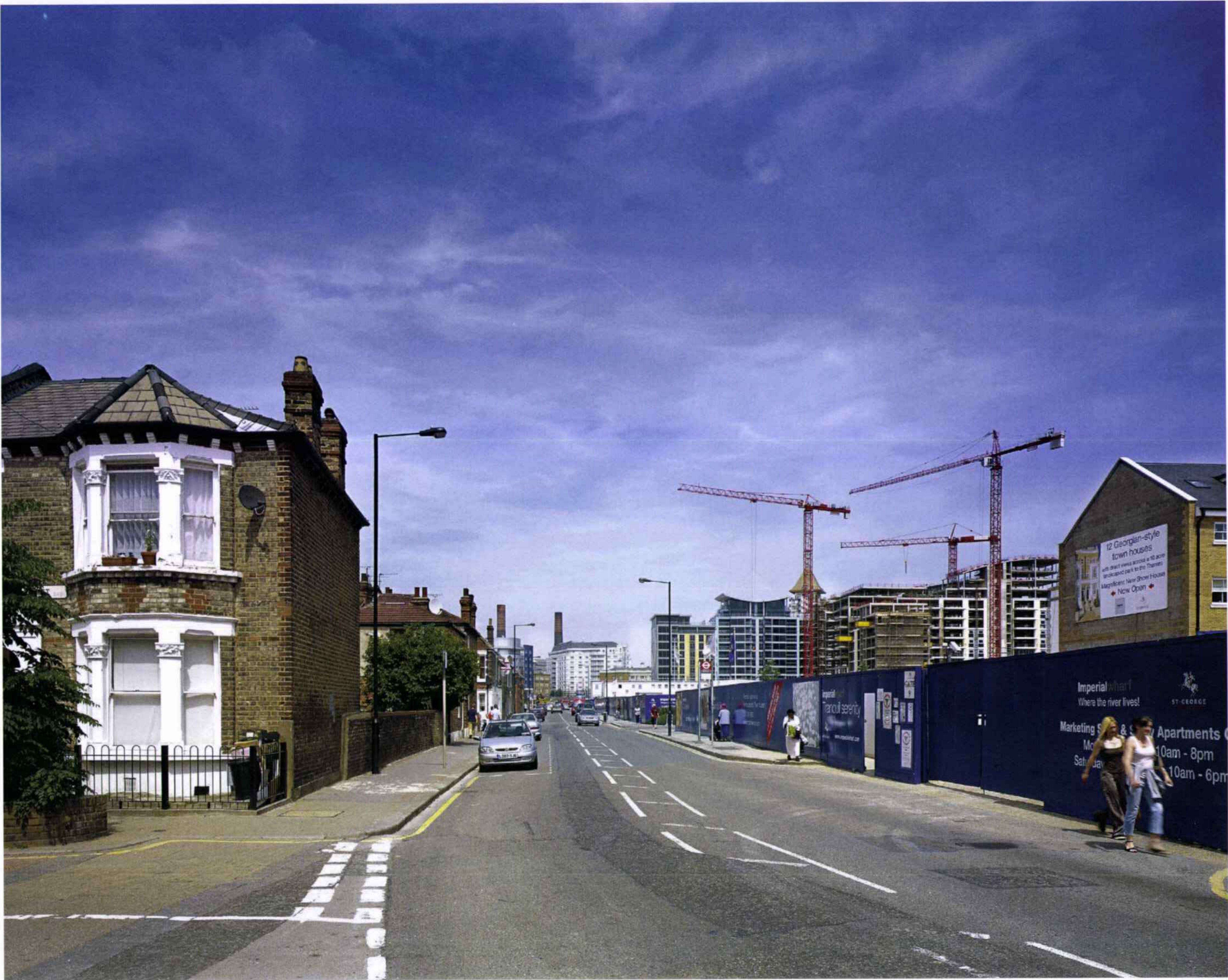


View RT11. Townmead Road beside the Imperial Wharf development site

Existing

1.58

This view complements CP16 in Appendix C1 of the Updated 2004 ES [CD 58]. It looks northeasterly along the axis of Townmead Road towards Lots Road power station. The Imperial Wharf residential development on the right is located within the Sands End Riverside Conservation Area. The development has advanced since view CP16 was taken, and it contrasts in scale and materials from the traditional two-storey brick terraces to the left, across Townmead Road. The chimneys of Lots Road power station are clearly visible at the end of the road, but only part of its existing roof can be glimpsed between them. Open space between Imperial Wharf and the construction hoardings ensure that its greater scale does not overpower the traditional buildings of Sands End: this view would be further enhanced by the foreground open landscaping that would become visible once the hoardings are removed. The pagoda-like top of Chelsea Harbour's Belvedere Tower (partially hidden here by the temporary tower crane on the left) forms a visual apex to the Imperial Wharf development.





**Proposed****1.59**

The proposed towers would rise behind Imperial Wharf, and their modern materials would connect it visually with that new residential development. There would therefore be a clear distinction in age and materials between the 19th century brick terraces to the left side of Townmead Road, the chimneys of Lots Road ahead, and the proposed modern glass towers of Lots Road and the development of Imperial Wharf to the right. From here the proposed towers would appear to be angled away from each other: the lower tower KC1 rising towards the chimneys of Lots Road; HF1 sloping away from Lots Road and addressing the river beyond. This new landmark would appear only marginally taller than the Belvedere Tower and, along with the Lots Road chimneys and the curved roofs of Imperial Wharf, the skyline would have variety and interest, adding to the character and quality of this northerly view through the Sands End Riverside Conservation Area.

**Significance of impact:**

Beneficial, moderate and local.





View RT12. Brompton Cemetery

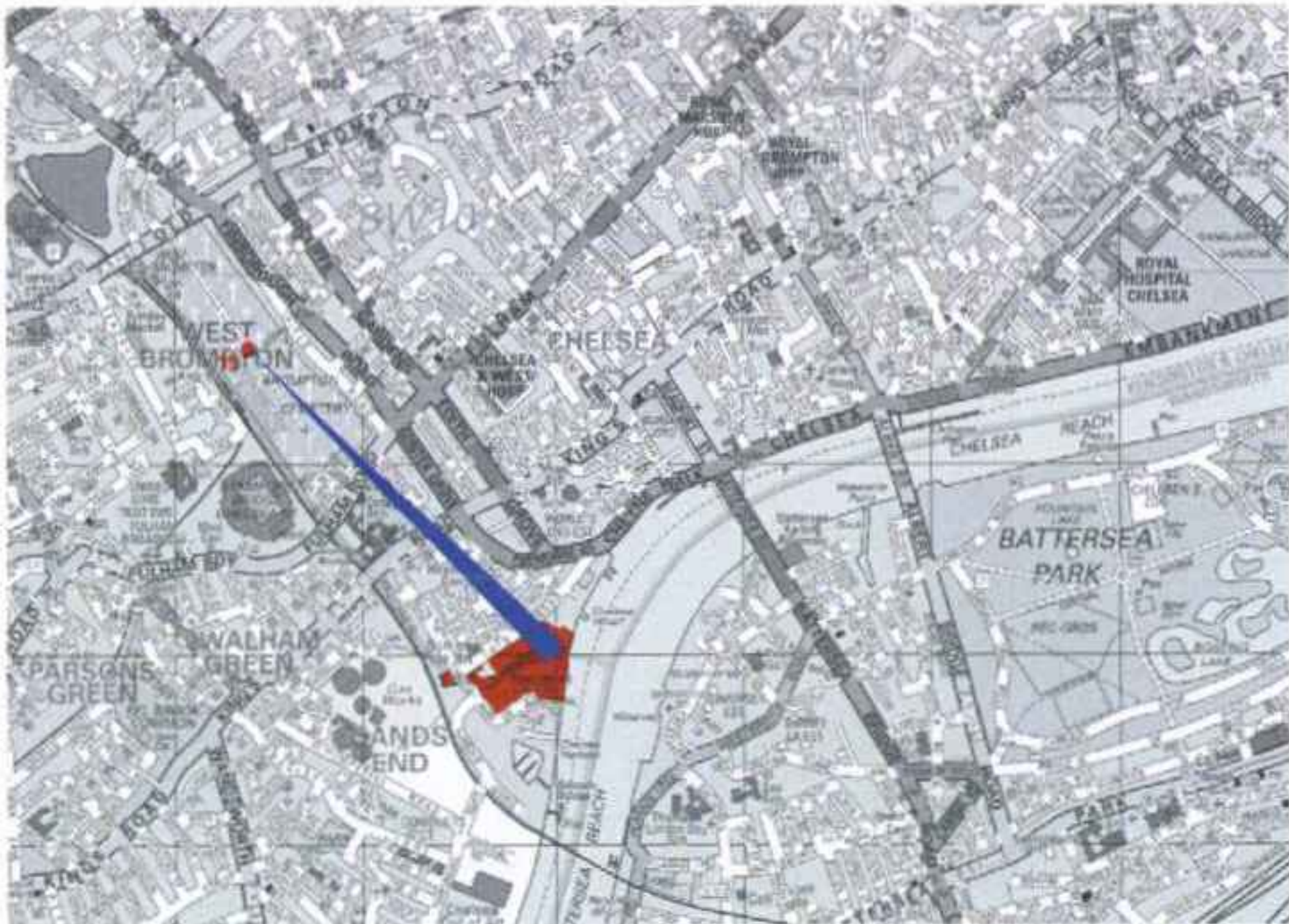
Existing

1.60

This is the more northerly of eight viewpoints from Brompton Cemetery that were included in Appendix C1 of the Updated 2004 ES [CD 58]. The entire cemetery is designated in the RBKC UDP as a Conservation Area, Metropolitan Open Land and as a Site of Nature Conservation Importance (SNCI). This view is taken on axis with the domed classical Church of England Chapel, designed by Benjamin Baud, which can be seen when entering the cemetery from the main gate on the Old Brompton Road: the Chapel is Grade II\* listed. From that entrance an avenue of trees frames the Chapel and tends to obscure the more extensive views beyond. This viewing position is from the mid-point of the cemetery layout, and the Chapel is close to the Fulham Road at the southern end of the cemetery where the view opens out.

1.61

The cemetery appears fairly level, and is set much higher than the Thames beyond. Consequently, only the top parts of the remaining chimneys of Lots Road power station can be seen against the sky beyond, to the immediate left of the domed Chapel. The pagoda-like top of Chelsea Harbour Belvedere Tower can be seen immediately behind and to the right of the Chapel's dome.





**Proposed****1.62**

The top of the taller of the two proposed towers (HF1) would be partially visible behind the eastern chimney of the former power station. Its materials and coloration would be such that, particularly in certain lighting conditions, it would merge with the sky. It would be seen in relation to the very varied and large quantity of obelisks and tombs in the foreground, which are made of stone: they belong to the earth, the tower to the sky. Unlike them, it would not draw the eye. HF1 would be located well off axis, and the domed Chapel would continue to hold the view. If noticed, HF1 would add to the visual interest of the scene, and would provide a somewhat ethereal reminder of the living city beyond. The proposed development would not harm.

**Significance of impact:**

Beneficial, minor and local



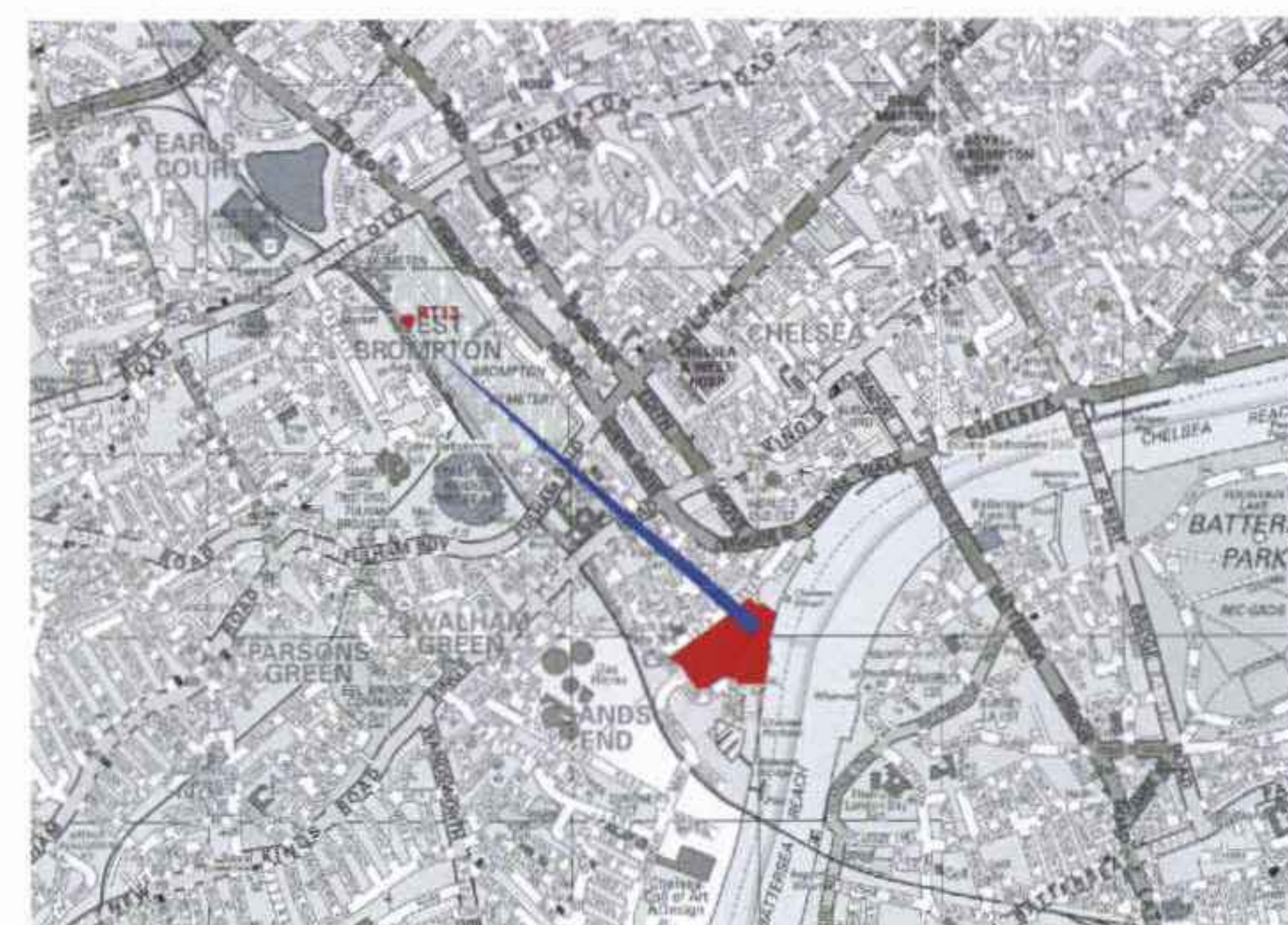
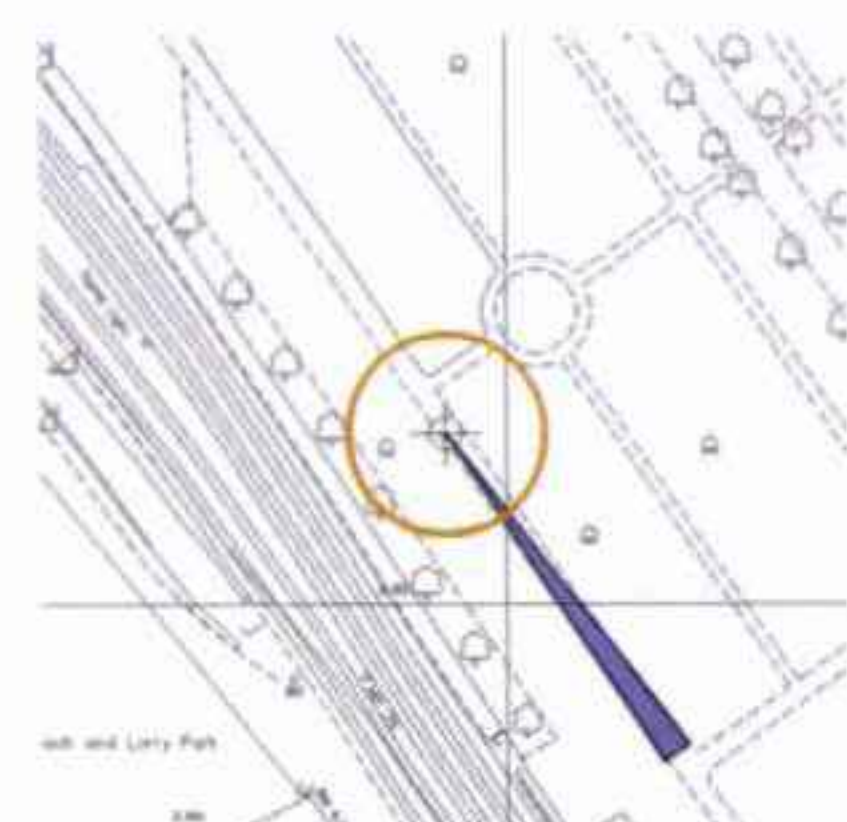


**View RT13. Brompton Cemetery (new view 1)****Existing****1.63**

This is the first of three additional views requested by the Friends of Brompton Cemetery that were photographed in November 2004: see also views RT14 and RT15 below.

**1.64**

This view is along a pathway running parallel and to the west of the central avenue of the cemetery, adjacent to a walled boundary, which conceals the railway beyond (on the right of the view). In the distance, at the end of the path and rising above the tree line is the angled pagoda-like top of Chelsea Harbour Belvedere Tower. The section of cemetery to the left of the path, and sectioned off by metal railings, contains fallen military personnel. The large crucifix seen emerging from a roughly hewn rock marks its centre. In the distance to its right is a small cupola surmounted by a crucifix, which rises above the trees. To its right is the eastern chimney of Lots Road power station; this is a recent view and smoke no longer issues from its chimneys - columns of smoke would previously have been a common feature of this view.





**Proposed****1.65**

The proposed residential towers would rise on the horizon, with the taller tower HF1 behind the visible chimney of the power station, the lower KC1 beyond and to the left of the distant cross and cupola. The tops of the towers would be angled towards one another, forming a paired composition. They would add to the existing elements on the horizon - trees of different height and species, cupola and cross, chimney stack, the pagoda-like top of Chelsea Harbour Belvedere - rising lower than the middle ground trees and the military cross to the left. The coloration of the towers would be neutral, and would take on the hue of the sky: they would have an ethereal quality, which is entirely complementary to the cemetery. If they draw the eye above the immediate interest of the gravestones and their inscriptions, they would enhance and not harm Brompton Cemetery.

**Significance of Impact:**

Beneficial, minor and local.



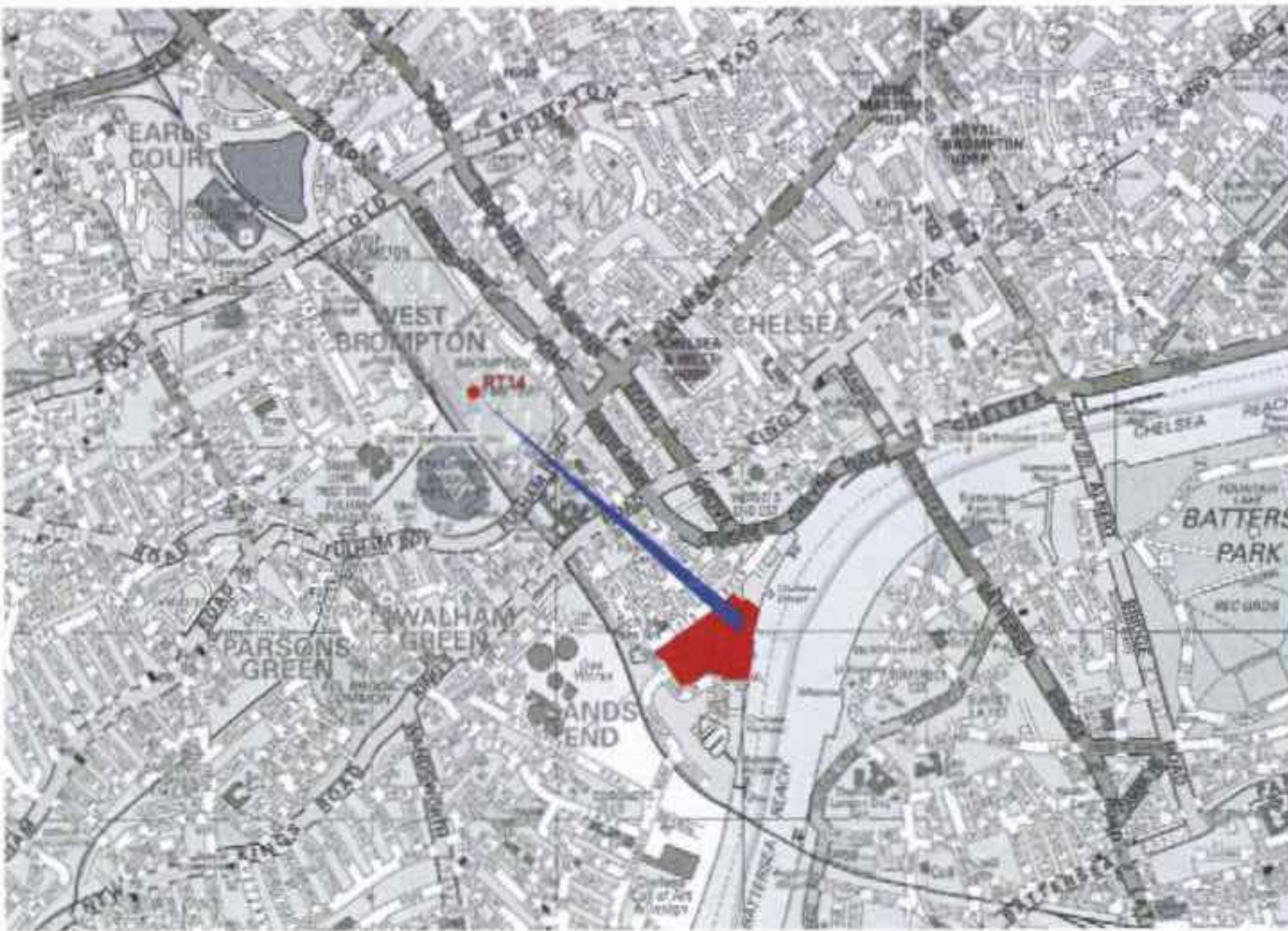


View RT14. Brompton Cemetery (new view 2)

Existing

1.66

This view is on axis with the western half of the arcade that flanks the central avenue of Brompton Cemetery: the domed Chapel can be seen in the distance to the left of the raised colonnade. The Chapel and arcade are Grade II\* listed. The tops of both chimneys of Lots Road power station can be seen rising beyond the lead covered dome of the Chapel. The small cupola and cross above the arcade ahead is the one visible in the previous view (RT13). The roof structure of Chelsea FC at Stamford Bridge is visible in the gap between the trees to the right of the view.





**Proposed****1.67**

The proposed towers would rise beyond and to the left of the power station: with HF1 behind its eastern chimney; only the tip of KC1 would be visible. They would hardly be noticed: the profusion of crucifixes, urns, obelisks and angels in the foreground and left are an immediate draw for the eye; the arcade and Chapel provide more obvious local destinations. If the proposed towers draw the eye above the immediate interest provided by Brompton Cemetery they would be regarded as intriguing additions to the skyline, adding variety to the scene. They would not harm local heritage interests.

**Significance of Impact:**

Beneficial, minor and local.



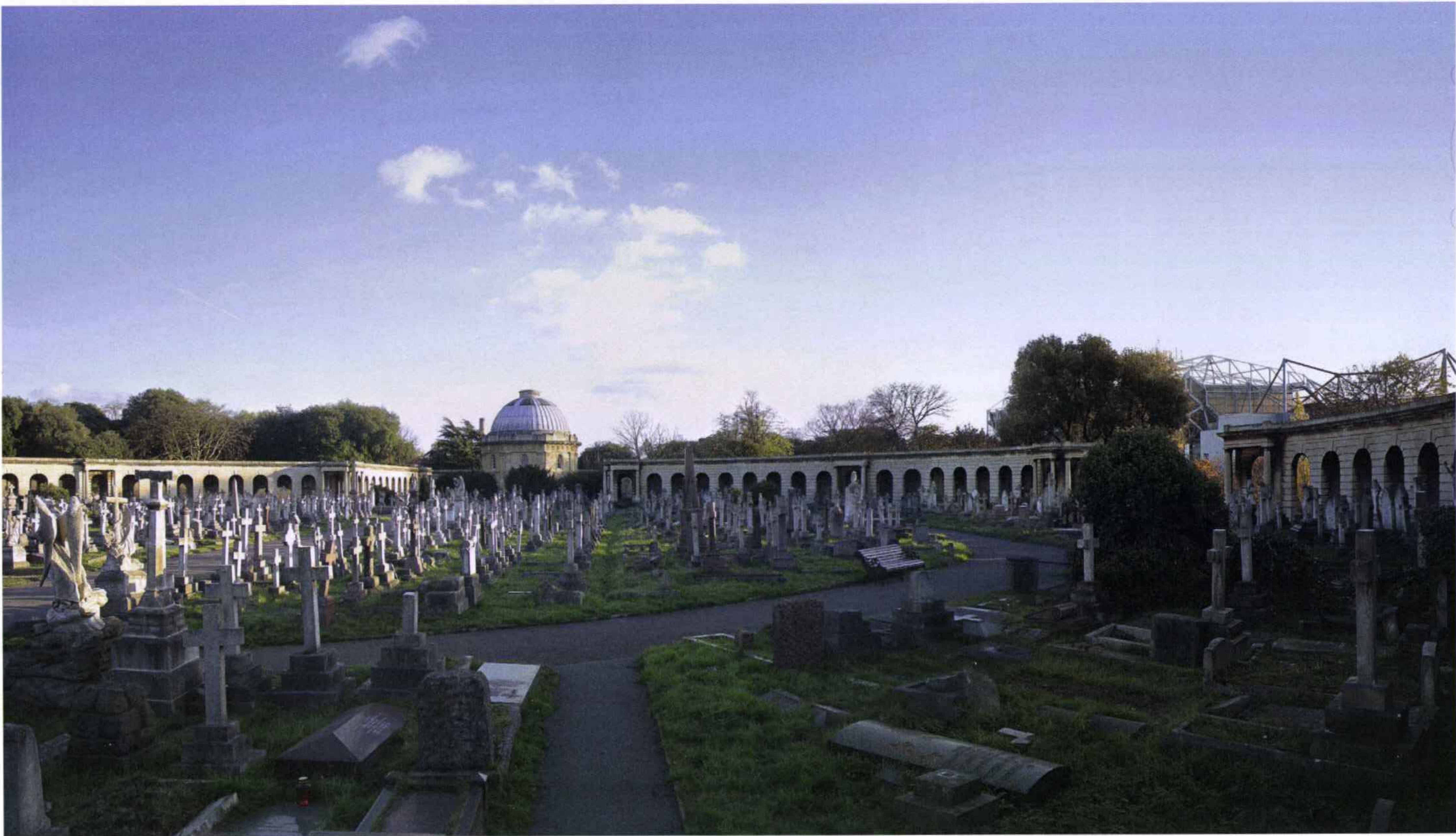
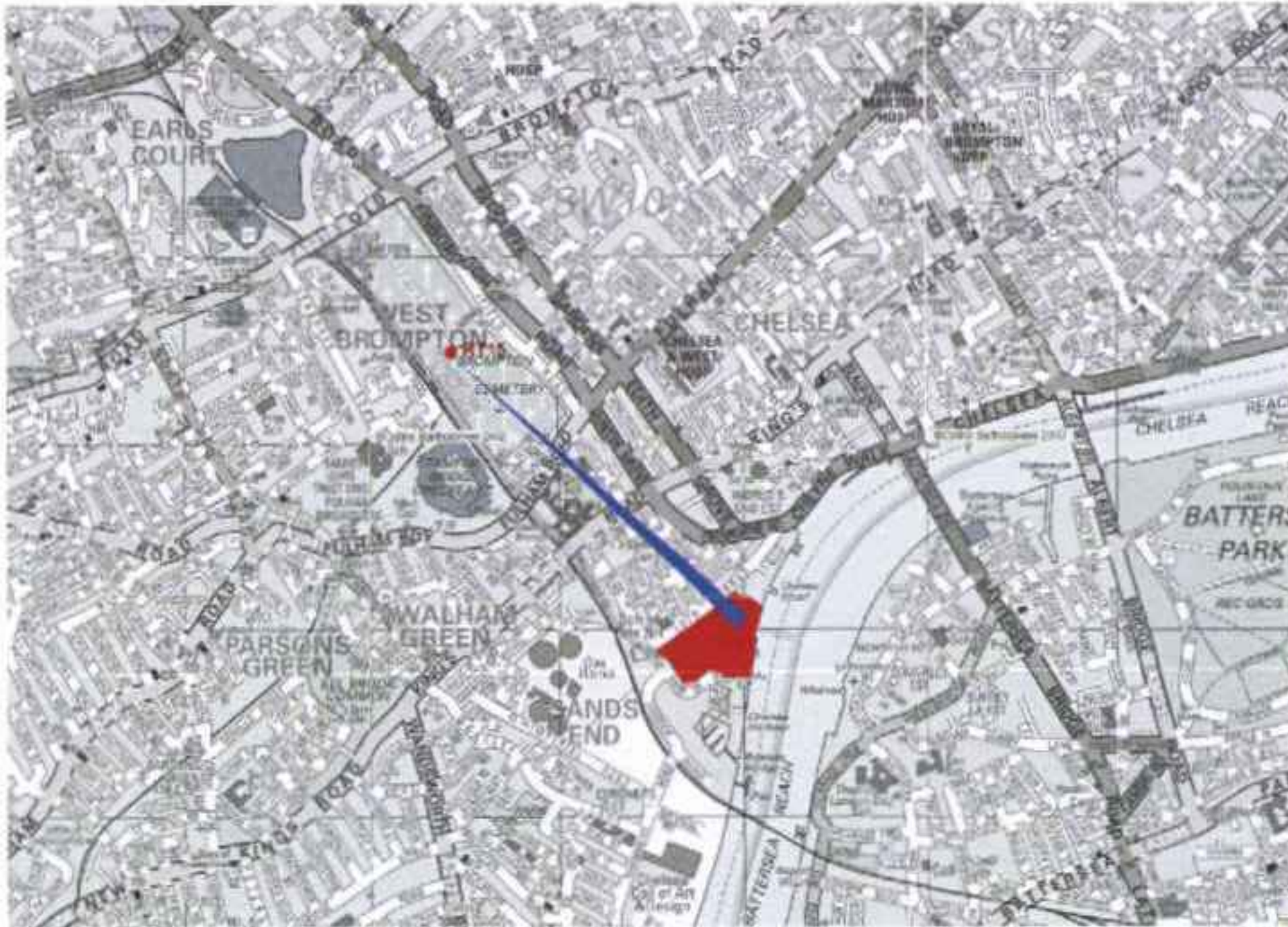
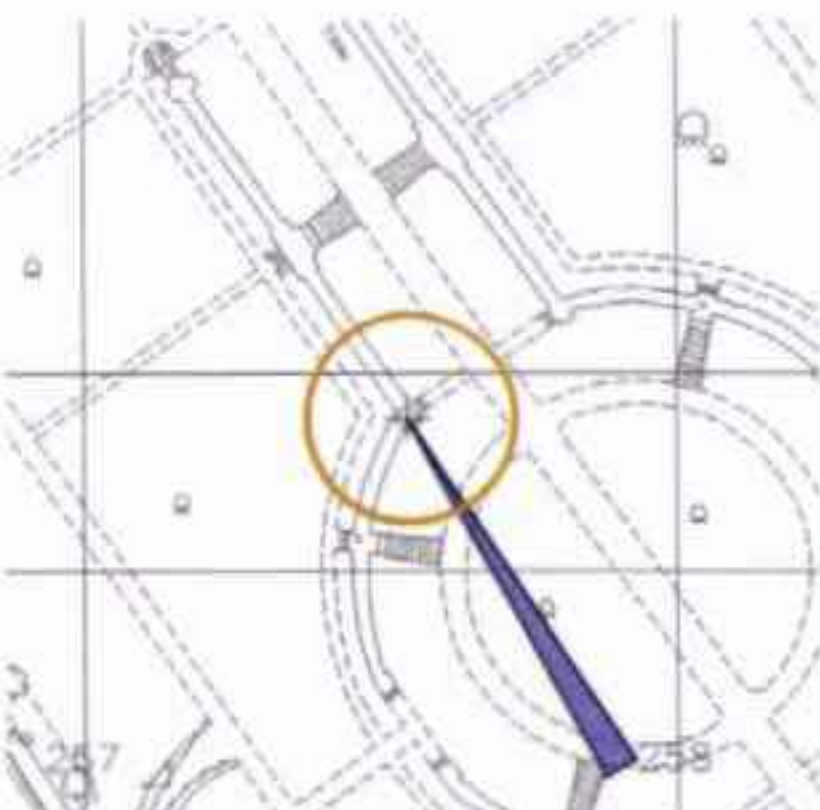


View RT15. Brompton Cemetery (new view 3) – panorama

Existing

1.68

The full extent of the central circus of arcades and the profusion and diversity of the gravestones it contains can be enjoyed from this raised position (at the southern end of the colonnade seen in RT14 above). The domed Chapel provides the architectural focus of the ensemble: the Chapel and quadrants are Grade II\* listed. Behind it can be seen the eastern chimney of Lots Road power station - no longer spewing out the billows of smoke that was once a constant feature of this view for almost a century. Chelsea Football Club's Stamford Bridge Stadium on the right exerts a major presence on the setting of the chapel and its arcade of catacombs, its tall, heavily engineered exterior, is in marked contrast to the ornate tombs of Brompton Cemetery - it provides a reminder of the living city beyond.





**Proposed****1.69**

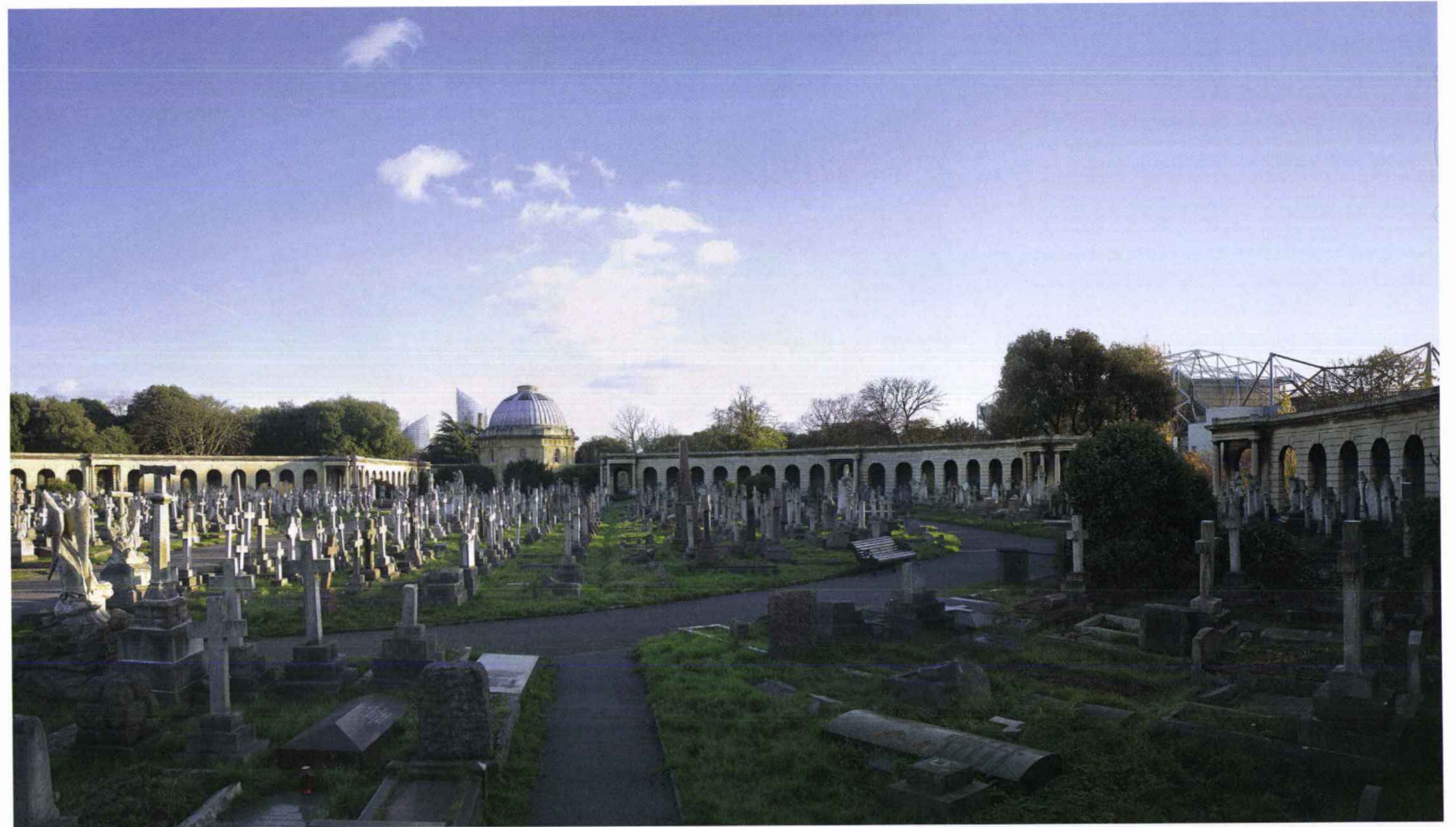
The top of the taller of the two proposed towers (HF1) would be partially visible behind the eastern chimney of the former power station, the lower tower (KC1) would be glimpsed between the trees. Their materials and coloration would be such that, particularly in certain lighting conditions, it would merge with the sky. They would be seen in relation to the very varied and large quantity of obelisks and tombs in the foreground, which are made of stone: they belong to the earth, the towers to the sky. The towers would not draw the eye and the domed Chapel and related quadrants of arcades would continue to hold the view.

**1.70**

Of course from a corresponding position to the east, from the parallel arcade across the central avenue, the proposed towers would not be visible at all. However, even where they are visible, I would agree with the comments made by English Heritage in their letter of 19 March 2003 to RBKC: they wrote that the views from Brompton Cemetery would not be harmed by the proposed development: "we do not consider there to be material harm to heritage interests". I share their confidence.

**Significance of impact:**

Beneficial, minor and local



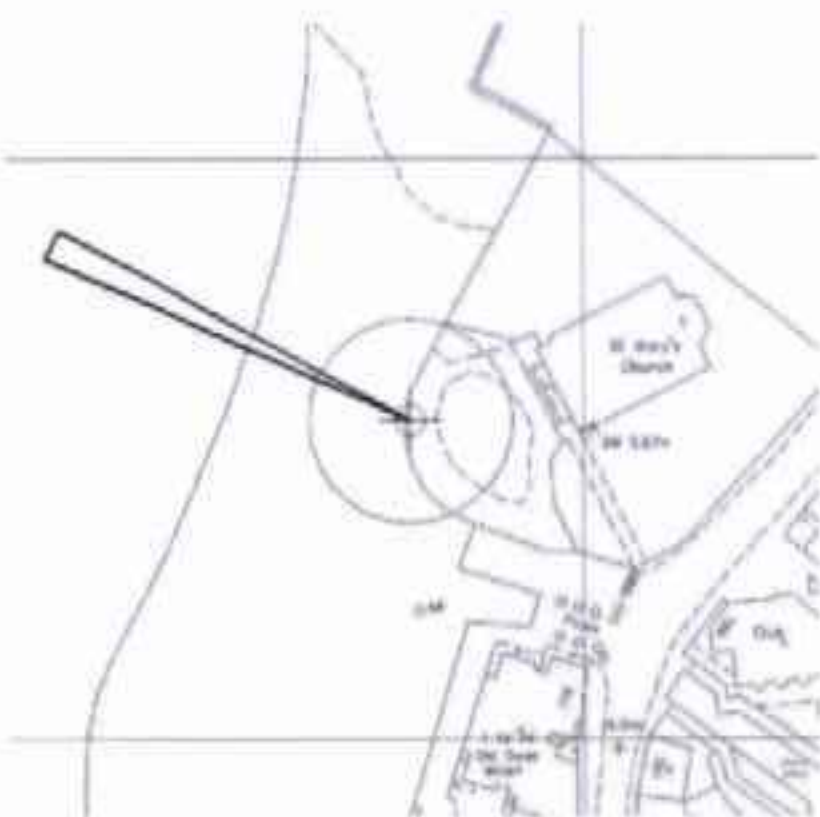


View RT16. St Mary's Churchyard, Battersea: Nighttime view (cf. RT1)

Existing

1.71

This view is taken from the same position as CP11 in Appendix C1 of the Updated 2004 ES [CD 58], and RT1 above – both daytime views. This view demonstrates the nighttime impact of Chelsea Harbour and the landmark Chelsea Harbour Belvedere Tower (on the left), and four of the residential towers that constitute World's End (on the right). In between is a dark landscape with an industrial silhouette, which is devoid of contemporary urban vitality.





**Proposed****1.72**

The two proposed glass residential towers would alternate with the brick chimneys of Lots Road power station: in contrast, they would radiate light and colour, enlivening and enhancing the night time riverscape. The body of the power station and the new publicly accessible spaces between and around the bases of the proposed towers would be punctuated with pools of light. The proposed development would benefit substantially the urban and riverside scene by night, as it would by day.

**Significance of impact:**

Beneficial, substantial and local.



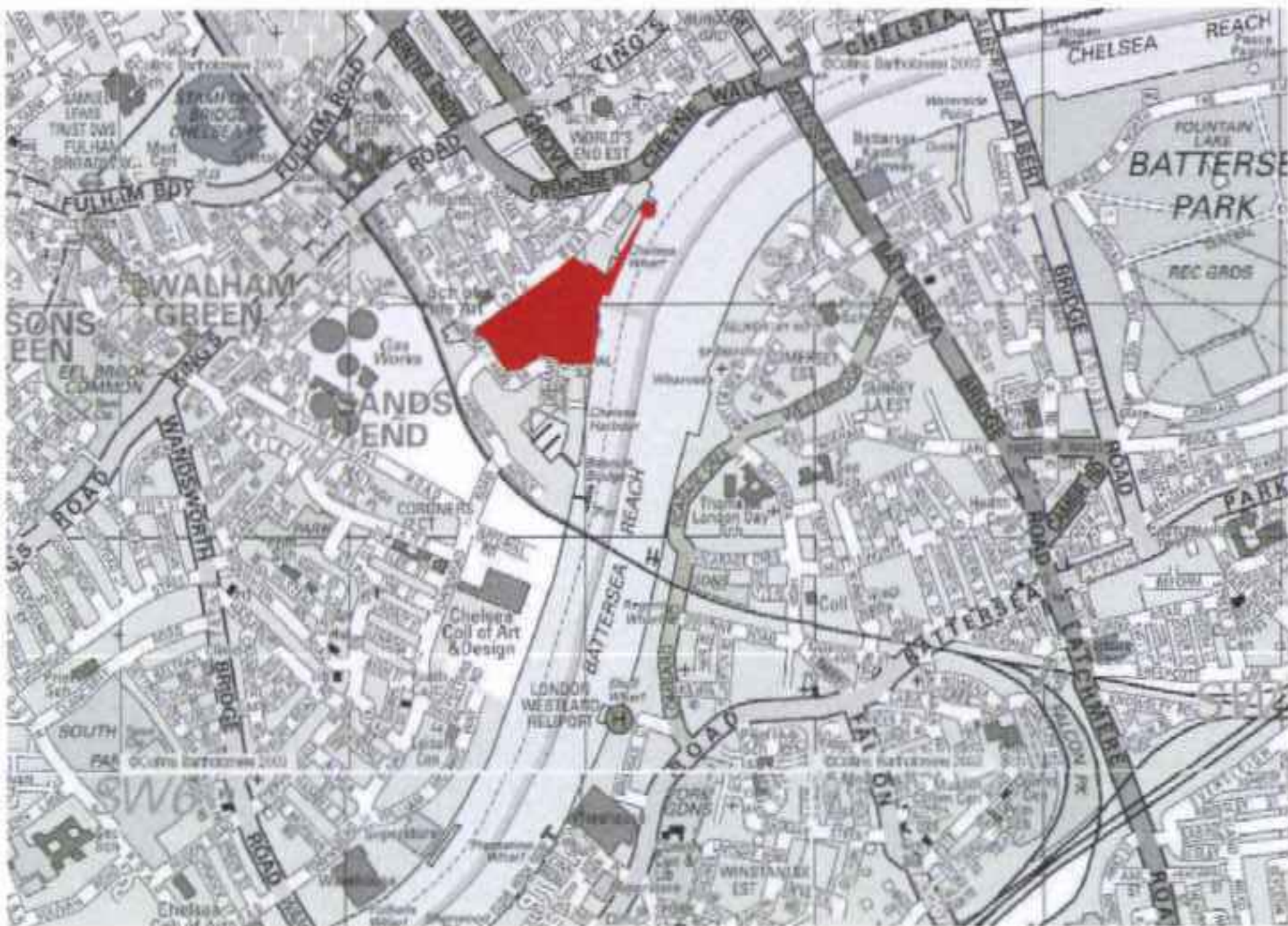


View RT17. Cremorne Gardens Pier: Nighttime view (cf. RT6)

Existing

1.73

The view currently lacks balance: solidly built wharves on the right bank (including the foreground Chelsea Wharf building) contrast with the imposing landmark of Montevetro on the southern bank of the Thames, which at night has a lantern-like character. Chelsea Harbour Belvedere Tower provides the only contemporary beacon of light in the distance on the northern bank. There is nothing of significant visual interest – no obvious destination – between the Belvedere Tower and Chelsea Wharf.





**Proposed****1.74**

The proposed towers would add considerably to this view of the riversides of the Thames at night. Their slender vertical emphasis, the relative transparency of their form, and their sloping tops would remain evident at night. The proposed development would enhance the riverside as well as the setting of the existing buildings, providing points of comparison against which Montevetro, the Belvedere Tower and Chelsea Wharf would be read. The prominence of the northern bank of the Thames would be properly re-asserted.

**Significance of impact:**

Beneficial, substantial and local.





View RT18. Tadema Road near to Burnaby Street:  
Nighttime view (cf. RT7)

Existing

1.75

The blank impervious walls of Lots Road power station provide a dark and ominous backdrop to what is otherwise a fairly typical London residential scene.





**Proposed****1.76**

The walls of the power station would be illuminated by the new publicly accessible internal plaza, which would be open until 10.00pm all the year round, and the proposed residential development that would surround it. The roof of the power station would be transformed by a horizontal band of glass, which would connect that building visually to the proposed glass towers, and functionally through the proposed new residential usage. The power station would have a more urban and humane appearance by night, as it would by day. The proposed towers would exert their presence on this domestic scene at night: although a greater distance away than the power station, the proposed towers – like the terraced housing in the foreground – would exhibit the domestic life they contain, contributing positively to the communal ambience of the locality.

**Significance of impact:**

Beneficial, substantial and local.



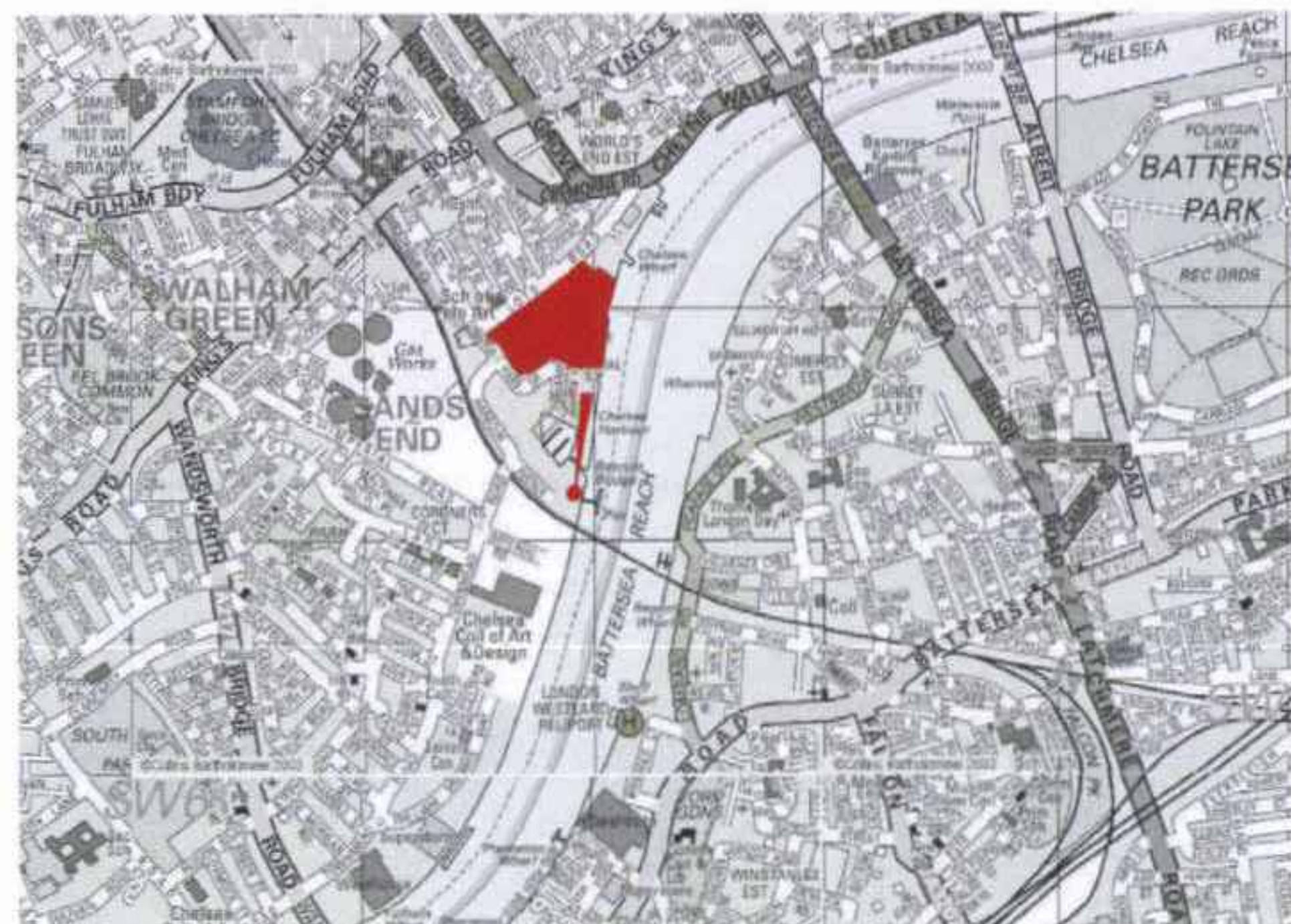
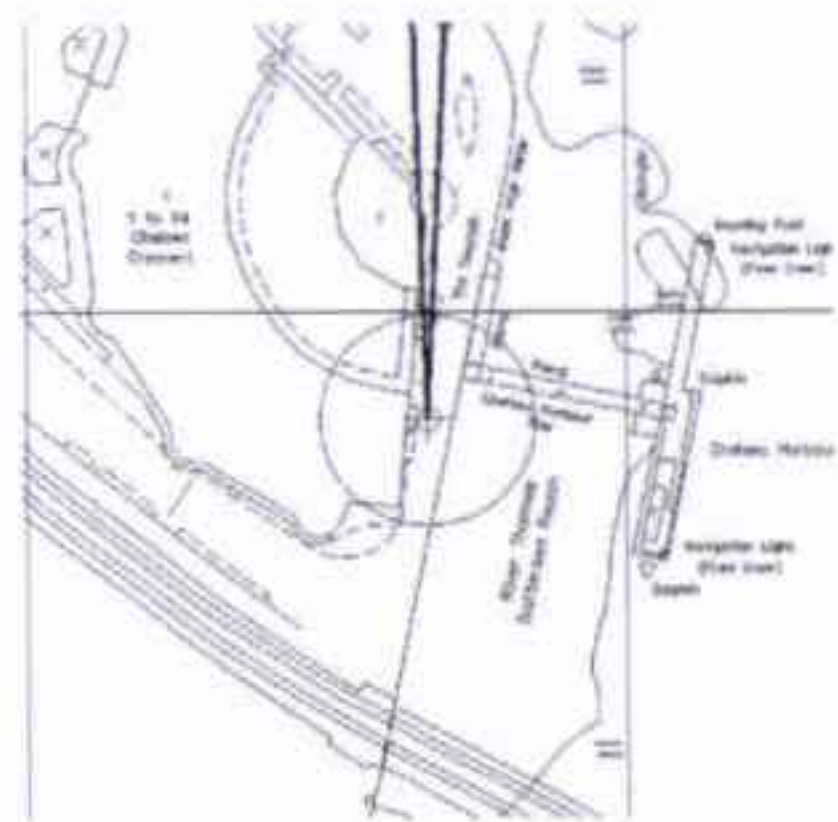


**View RT19. Chelsea Harbour Pier/ Quayside:  
Nighttime view (cf. RT10)**

**Existing**

**1.77**

This is the northerly view at the northern end of the Sands End Riverside Conservation Area having emerged from under an arch of the railway viaduct at Battersea Reach, and on arrival at the Chelsea Harbour Pier: the entrance to which is visible on the right. The view is framed by the Belvedere Tower on the left and Montevetro on the right, with St Mary's Church in Montevetro's foreground. Ahead, the Embankment is composed of a constellation of lights: the Post Office Tower and Millbank Tower can be singled out against the night sky. A brick chimney of the former power station appears in silhouette on the left, beyond the Belvedere Tower. Taken together, this is an attractive place, which is enlivened by the modern buildings that frame it.





**Proposed****1.78**

The taller of the proposed towers (HF1) would emerge from behind the existing riverside apartments: part of the lower tower (KC1) would be glimpsed behind, to its right. Their lantern-like forms at night would be read in conjunction with Montevetro on the Wandsworth bank of the Thames. Together, they would reinforce the sense that this is a gateway through which the river passes. This would be an attractive and memorable place by night, as it would be by day.

**Significance of impact:**

Beneficial, moderate and local.





# Summary Table of Views

View	Position/view	Potential Impact	Significance
CP1	Northern end of Chelsea Bridge: View w/s-w.	The two proposed towers would be slender distant objects on the horizon. The towers would not harm setting of Albert Bridge. They would obscure power station chimneys, but provide a more distinctive landmark.	Beneficial Minor District
CP3	Chelsea Embankment, near Royal Hospital's Embankment Gardens: View w/s-w.	The two proposed towers would be slender distant objects on the horizon. The towers would not harm setting of Albert Bridge. They would obscure power station chimneys, but provide a more distinctive landmark.	Beneficial Minor District
CP5	North end of Albert Bridge: View s-w.	The two proposed towers would be viewed head on, appearing at their most slender. They would provide a central focus between Montevetro and World's End, in scale with the breadth of the River and the broad arched spans of Battersea Bridge.	Beneficial Moderate District
CP7	Northern end of Battersea Bridge adjacent to Cheyne Walk: View s-w.	The proposed towers would step up in height from the chimneys of the power station, the taller tower (HF1) establishing a mid-point between Montevetro and World's End, and a dramatic new landmark. The proposed housing blocks would have heights comparable to the residential components of Chelsea Harbour and Imperial Wharf, positively reinforcing the River edge.	Beneficial Substantial District
CP8	South end of Battersea Bridge: View w/s-w.	The proposed towers would step up in height from the chimneys of the power station, the tallest tower (HF1) establishing a mid-point between Montevetro and World's End, and a dramatic new landmark. The proposed housing blocks would have heights comparable to the residential components of Chelsea Harbour and Imperial Wharf, positively reinforcing the River edge.	Beneficial Substantial District
CP9	Wandsworth Riverside Walk (1): View w	The proposed towers would flank the entrance to Chelsea Creek. Tower KC1 would conceal the chimneys of the power station but have a similar apparent scale. Their high quality materials and details would be visible. The proposed housing blocks would have heights comparable to the former Wharf buildings, positively reinforcing the River edge.	Beneficial Substantial Local
CP10	Wandsworth Riverside Walk (2): View w	The proposed towers would flank the entrance to Chelsea Creek, and frame the chimneys and main form of the power station. Their high quality materials and details would be visible. The proposed housing blocks would have heights comparable to the former Wharf buildings, positively reinforcing the River edge.	Beneficial Substantial Local
CP12	Riverside by Vicarage Crescent, Battersea: View n-n-w.	The proposed housing blocks would have heights comparable to the residential components of Chelsea Harbour, concealing the main form of the power station, but positively reinforcing the River edge. The proposed towers would form a paired composition, appearing to be angled towards each other, and away from the chimneys of the power station (HF1), and the Thames and World's End (KC1). They would appear no taller than Chelsea Harbour Belvedere, and would add positively to the scene.	Beneficial Substantial Local
CP13	Wandsworth end of Battersea Rail Bridge outside Graveside Walk: View n/n-w.	The proposed housing blocks would have heights comparable to the residential components of Chelsea Harbour, concealing the main form of the power station, but positively reinforcing the River edge. The proposed towers would form a paired composition (more closely twinned than in view CP12), appearing to be angled towards each other, and away from the chimneys of the power station (HF1), and the Thames and World's End (KC1). They would appear no taller than Chelsea Harbour Belvedere, an important contemporary landmark, and would add positively to the scene.	Beneficial Substantial Local
CP14	Southern end of Wandsworth Bridge: View n/n-e.	The proposed towers would be distant objects beyond the Sands End Riverside Conservation Area, but would add to the skyline interest provided by the power station chimneys and Chelsea Harbour Belvedere, creating a mini-cluster of taller structures on the horizon. Imperial Wharf would conceal the lower portion of the proposed towers.	Beneficial Minor District
CP33	Western pavement of Ashburnham Road in line with Tadema Road: View s/s-e	The proposed towers would provide a new conclusion to the vista of high quality, well-modelled forms apparently of a similar height to the chimneys of the power station.	Beneficial Substantial Local
CP36	Tadema Road: View s/s-e.	The proposed towers would provide a new conclusion to the vista down Tadema Road. Their well-modelled forms would appear to have a similar height to the chimneys of the power station. Their high quality materials and details would be visible, as would the glazing opening up the roof of the power station.	Beneficial Substantial Local



RT1	St Mary's Churchyard, Battersea: View n-w.	The proposed towers would flank the entrance to Chelsea Creek. Tower HF1 would appear between the chimneys of the power station, tower KC1 would angle down towards the former Wharf buildings. A new cluster of forms would create around Chelsea Creek would combine with an existing landmark to animate the River frontage. The high quality materials and details of the towers would be visible from here. The proposed housing blocks along the Thames frontage would have heights comparable to the former Wharf buildings and the residential blocks of Chelsea Harbour, positively reinforcing the River edge.	Beneficial Substantial Local
RT2	Old Swan Wharf: View n-w.	The proposed towers, with their differing heights and angles tops,, would create a positive link with the residential towers of World's End. New planting would reinforce the green edge of the River, above which the lower residential blocks and towers would rise.	Beneficial Substantial Local
RT3	Plantation Wharf Quayside: View n.	The proposed towers would overlap in this view: the entire profile of HF1 would be visible. They would form a distinctive landmark apparently relating to the height of Chelsea Harbour Belvedere Tower.	Beneficial Substantial District
RT4	Cheyne Walk/Milman's Street: View s-w.	The proposed towers would provide an appropriate visual response to Montevetro across the Thames, and provide an appropriate emphasis and scale to this broad sweep of the River. The high quality materials of the proposed towers would be visible and would contrast positively with the masonry chimneys of the power station.	Beneficial Substantial Local
RT5	Cheyne Walk/ World's End: View s-w.	The existing foreground advertising hoardings detract from the scene. The paired towers would overlap in this view, the lowest (KC1) being closer to the viewing position and linking to the heights of the chimneys of the power station. They would provide high quality additions to the townscape, would signal the River and changing character of the site, from industrial to residential.	Beneficial Moderate Local
RT6	Cremorne Gardens Pier: View s-w.	The proposed towers would add considerably to this view: they would be the most elegant buildings in view, enhancing the setting of the existing buildings. The prominence of the northern bank of the Thames would be properly re-asserted, balancing Montevetro opposite.	Beneficial Substantial Local
RT7	Tadema Road near to Burnaby Street: View s/s-e.	Only the upper portions of the proposed towers would be visible, and they would appear to rise no higher than the brick chimneys of the power station. Their glass forms would contrast positively with the industrial chimneys and would signal the Thames beyond. The roof of the power station would be transformed by a horizontal band of glass, which would connect that building visually to the proposed glass towers, and functionally through the proposed new residential usage.	Beneficial Substantial Local
RT8	Junction Burnaby Street and Tetcott Road: View e/s-e.	Only the upper portion of the lower proposed tower (KC1) would be visible in this view. The roof of the power station would be transformed by a horizontal band of glass, which would literally lighten its impact locally, and connect that building visually to the glass tower at its end, as well as functionally through the proposed new residential usage.	Beneficial Substantial Local
RT9	Marina in Chelsea Harbour: View n/n-e.	Only the top of the tallest of the proposed towers (HF1) would be visible: its top would appear to slope down to the chimneys of the power station. The white – more solid – walls of the existing residential buildings would continue to dominate the view.	Beneficial Moderate Local
RT10	Chelsea Harbour Pier/ Quayside	The taller of the proposed towers (HF1) would appear to emerge from behind the existing riverside apartments. Its sloping top would appear to rise up from the chimney of the power station in view, and to meet the line of the upward slope of Montevetro across the Thames: together they would suggest an urban gateway through which the River flows enhancing this view from the northern boundary with the Sands End Riverside Conservation Area.	Beneficial Moderate Local
RT11	Townmead Road beside the Imperial Wharf development site: View n/n-e.	The proposed towers would form an overlapping pair: they would be distant objects on the horizon beyond the Sands End Riverside Conservation Area. The lower KC1 would appear to angle up towards the chimneys of the power station, the taller HF1 would angle up from their height to address the Thames and the bank beyond. They would add to the skyline of the district.	Beneficial Moderate District
CP19 (RT12)	Brompton Cemetery: View s-w.	The top of the taller of the two proposed towers (HF1) would be partially visible behind the eastern chimney of the power station. Its materials and coloration would be such that it would tend to merge with the sky. Its angled top is distant from the domed classical chapel, and there is a chimney of the power station in between. Its top would angle away from the chapel and the chapel would continue to hold the view among a varied profusion of architectural forms.	Beneficial Minor District
RT13	Brompton Cemetery (new 1): View s-w.	The proposed residential towers would rise on the horizon, with the taller tower HF1 behind the visible chimney of the power station, the lower KC1 beyond and to the left of the distant cross and cupola. The tops of the towers would form a paired composition and would add to the existing elements on the horizon. The coloration of the towers would take on the hue of the sky: they would have an ethereal quality complementary to the cemetery. They would enhance and not harm Brompton Cemetery.	Beneficial Minor Local



RT14	Brompton Cemetery (new 2): View s-w.	The proposed towers will rise beyond and to the left of the power station. They will hardly be noticed: the profusion of crucifixes, urns, obelisks and angels in the foreground and left are an immediate draw for the eye; the colonnade and chapel provide local destinations. They would not harm heritage interests.	Beneficial Minor Local
RT15	Brompton Cemetery (new 3): View s-w.	The top of HF1 would be partially visible behind the eastern chimney of the former power station. Its materials and coloration would be such that it would merge with the sky. It would be seen in relation to the very varied and large quantity of obelisks and tombs in the foreground, which are made of stone: they belong to the earth, the tower to the sky. It would not draw the eye and the domed chapel would continue to hold the view.	Beneficial Minor Local
RT16	St Mary's Churchyard, Battersea: Night time view n-w (cf. RT1)	The two proposed glass residential towers would radiate light and colour, enlivening and enhancing the night time riverscape. Behind their bases the body of the power station and the new publicly accessible spaces between would be punctuated with pools of light. The proposed development would benefit substantially the urban and riverside scene by night as it would by day.	Beneficial Substantial Local.
RT17	Cremorne Gardens Pier: Night time view s-w (cf. RT6)	The proposed towers would enhance the riverside as well as the setting of the existing buildings, providing points of comparison against which Montevetro, Belvedere Tower and Chelsea Wharf would be read. The prominence of the northern bank of the Thames would be properly re-asserted.	Beneficial Substantial Local.
RT18	Tadema Road near to Burnaby Street: Night time view s/s-e (cf. RT7)	The walls of the power station would be illuminated by the new publicly accessible plaza, which would be open until 10.00pm all the year round. The roof of the power station would be transformed by a horizontal band of glass, which would connect that building visually to the proposed glass towers, and functionally through the proposed new residential usage. The proposed towers would exert their presence on this domestic scene at night: like the terraced housing in the foreground they would exhibit the domestic life they contain.	Beneficial Substantial Local.
RT19	Chelsea Harbour Pier/ Quayside: Night time view n/n-e (cf. RT10)	HF1 would emerge from behind the existing riverside apartments: part of KC1 would be glimpsed behind it to its right. Their lantern-like forms at night would be read in conjunction with Montevetro on the Wandsworth bank of the Thames. Together, they would reinforce the sense that this is a gateway through which the river passes. This would be an attractive and memorable place by day and night.	Beneficial Moderate Local

1.79

The impact of the development on the existing townscape by day and night would range from minor, to moderate and substantial. Overall, its impact on the area would be beneficial and the riverside would be enhanced.

Summary Table of Listed Buildings and Conservation Areas

Heritage Asset	Potential Impact	Significance
1. The Cheyne Walk part of the Thames Conservation Area	This is identified in the following views: CP7, RT4, RT5	Beneficial: moderate to substantial
2. Brompton Cemetery Conservation Area, MoL and SNCI, with its Grade II* Chapel and arcades	This is identified in the following views: CP19 (RT12), RT13, RT14 and RT15	Beneficial: minor
3. Nearest bridges across the Thames: Battersea Bridge (Grade II); and Albert Bridge (Grade II*)	The impact on Battersea Bridge is identified in the following views: CP5, CP7, CP8	Beneficial: Moderate to substantial
	The impact on Albert Bridge is identified in the following views: CP5, CP7, CP8	Beneficial: Minor to moderate
4. St Mary's Church (Grade I)	This is identified in the following views: RT1, RT10 and RT19	Beneficial: Substantial
5. Sands End Riverside Conservation Area	This is identified in the following views: CP14, RT10, RT11 and RT19	Beneficial: from minor through to substantial
6. Night time views	These are identified in views: RT16, RT17, RT18 and RT19	Beneficial: moderate to substantial



# Summary of Significance of Impact and Conclusion

## Summary of Significance of Impact

### 1.80

With this proposal, TFP have composed and disposed the high-rise blocks to interact sculpturally with the power station and its surviving chimneys. The towers would inter-relate through their pairing, and would be seen to 'communicate' sculpturally with each other, in particular by reason of their complementary forms and silhouette as well as of their disposition on either side of the creek.

### 1.81

This is a carefully considered, site-specific composition that has evolved during the design and consultation process. This final version has benefited from the protracted debate, in particular with respect of the relationship between the two towers; the manner in which they meet the ground; and the formal counterpoint with the material and profile of the power station. By siting the towers at the water's edge, on the very brink of the land, the embankment would become an integral part of their structures.

### 1.82

The evident slenderness of the proposed towers has been achieved by subtle geometry whereby the leading edges of the towers are indeed sharpened to extremely narrow acute corners on one axis, while on the wide side elevations the slender impression is achieved by the distinct changes of plane which catch the light in different ways, and by the central string of deeply articulated balconies which would appear to 'stitch' the two halves together, creating seams of deep shadows which emphasise the verticality.

### 1.83

The quality and character of the proposed architecture is such that it would not harm the settings of any of the local listed buildings or conservation areas. The setting of the Grade I listed church of St Mary, Battersea has been enhanced by Montevetro: they are both high quality buildings and the architectural differences between them provide a satisfying visual contrast. Further, as can be seen from two of the new views - RT4 from Cheyne Walk, and RT2 from Old Swan Wharf - the proposed Lots Road towers would complement Montevetro and St Mary, across the Thames. They would balance the composition of the view and provide additional, high quality architectural interest to these views, benefiting the setting of the listed building.

### 1.84

Of the new views selected, RT3, RT4, and RT11 were chosen to include views to or from several major new residential developments that have been completed or are still under construction along this stretch of the Thames. The remaining views were selected to provide a more complete context for the assessment, either by supplementing more focussed views with broader panoramas (views RT1 and RT7), or by adding local views that help to explain the setting of the development more completely (views RT2, RT5, RT6, RT8, RT9, and RT10): of the latter, RT2, RT5, RT7 and RT8 are presented as panoramas. Photomontage views closest to the proposed development have been rendered to enable an accurate assessment to be made of their visual impact on the scene.

### 1.85

The views RT4 and RT5 are from the Cheyne Conservation Area and, with RT6, they look across the Thames Conservation Area. View RT10 is from the northern end of the Sands Conservation Area looking towards Cheyne Walk. CP19 (RT12), RT13, RT14, and RT15 have been taken from the Brompton Cemetery Conservation Area. CP19 (RT12) is the third of a sequence of eight views taken from the cemetery that were included in Appendix C1 of the December 2002 assessment; views RT13 to RT15 are new views that were specifically selected by Mr Selwyn of the Friends of Brompton Cemetery, with myself. The Brompton Cemetery views are relevant because the entire cemetery is designated as a Conservation Area, Metropolitan Open Land and a Site of Nature Conservation Importance (SNCI).

### 1.86

It is evident from these views across the local conservation areas that the proposed residential towers would benefit the settings of these Conservation Areas. They would add to the variety of the skyline, accentuate the form of the outer bend of the Thames in relation to a broad stretch of open water. The enhanced planting alongside the riverside at their base would bring new life to the water's edge, translating the existing industrial wasteland into a prime residential area next to the river.

### 1.87

By night, the proposed development will illuminate a darkened void within the river and cityscape, its lights providing rivers edge with a new continuity from Imperial Wharf through Chelsea Harbour to World's End beyond. The pattern of lights in the proposed residential towers will change with their occupancy: the reflections of light in the river will shimmer and change with the rise and ebb of the Thames and varying local weather conditions. The river will be enhanced.

## Conclusion

### 1.88

My conclusions remain the same as in my main proof: the proposed development at Lots Road would benefit each view and it would enhance, not harm listed buildings and conservation areas.



# Appendix RT/4 A summary of policy and guidance relevant to evidence of Professor Robert Tavernor.

## Contents:

### National

- i) Planning Policy Guidance Note 1 (PPG1) - *PPG1: General Policy and Principles* (1997). [CD123]
- ii) Planning Policy Guidance Note 15 (PPG15) - *Planning and the Historic Environment* (September 1994). [CD131]
- iii) The Department for Transport, Local Government and the Regions (DTLR – now DEFRA) and Commission for Architecture and the Built Environment (CABE) *By Design. Urban design in the planning system: towards better practice* (2000). [CD146]
- iv) The English Heritage (EH)/Commission for Architecture and the Built Environment (CABE) *Guidance on Tall Buildings* (March 2003). [CD151]

### Regional

- v) RPG3B/9B: *Strategic Planning Guidance for the River Thames* (February 1997). [CD186]
- vi) *Thames Strategy – Kew to Chelsea*, Atkins (June 2002). [CD226]
- vii) GLA *London's Skyline, Views and High Buildings*, SDS Technical Report 19 (August 2002)
- viii) The Mayor of London's *The London Plan* (February 2004). [CD174]

### Local

- ix) LBHF UDP adopted in August 2003. [CD222]
- x) RBKC UDP adopted in May 2002. [CD199]

## National

### i) PPG1: General Policy and Principles

PPG1 is relevant in a general way in relation to design and urban design, as defined in paragraph 14 of PPG1:

*"14. For the purposes of this Guidance, urban design should be taken to mean the relationship between different buildings; the relationship between buildings and the streets, squares, parks, waterways and other spaces which make up the public domain; the nature and quality of the public domain itself; the relationship of one part of a village, town or city with other parts; and the patterns of movement and activity which are thereby established: in short, the complex relationships between all the elements of built and unbuilt space. As the appearance and treatment of the spaces between and around buildings is often of comparable importance to the design of the buildings themselves, landscape design should be considered as an integral part of urban design."*

Paragraphs 15 to 17 relate how good design may benefit a proposed development, the need to demonstrate how good design has been implemented, and the need to reject poor designs:

*"15. Good design should be the aim of all those involved in the development process and should be encouraged everywhere. Good design can help promote sustainable development; improve the quality of the existing environment; attract business and investment; and reinforce civic pride and a sense of place. It can help to secure continued public acceptance of necessary new development."*

*"16. Applicants for planning permission should be able to demonstrate how they have taken account of the need for good design in their development proposals and that they have had regard to relevant development plan policies and supplementary design guidance. This should be done in a manner appropriate to the nature and scale of the proposals."*

*"17. Local planning authorities should reject poor designs, particularly where their decisions are supported by clear plan policies or supplementary design guidance which has been subjected to public consultation and adopted by the local planning authority. Poor designs may include those inappropriate to their context, for example those clearly out of scale or incompatible with their surroundings."*

Annex A of PPG1 refers to the handling of design issues through seven paragraphs:

*"A1. [...] Plan policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout and access of new development in relation to neighbouring buildings and the local area more generally."*

*"A2. Development plans may refer to supplementary design guidance [...] which] may usefully include advice about matters such as lighting and materials, where these are likely to have a significant impact on the character or quality of the existing environment."*

*"A3. The weight accorded to supplementary design guidance in*

*planning decisions will be expected to increase where it has been prepared in consultation with the public and with those whose work it may affect, and has been formally adopted by the local planning authority. [...]"*

*"A4. Applicants for planning permission should, as a minimum, provide a short written statement setting out the design principles adopted as well as illustrative material in plan and elevation. This material should show the wider context and not just the development site and its immediately adjacent buildings. Inclusion of relevant perspective views can also be of value. Such material will be particularly important in relation to complex or large-scale development proposals, and those involving sensitive sites. [...]"*

*"A5. Applicants are encouraged to consult at an early stage [...]"*

*"A6. The use of conditions or planning obligations can be helpful in securing a high quality of design."*

*"A7. In considering the design of proposed new development, local planning authorities, developers and designers should take into account the advice contained in DOE Circular 5/94, "Planning out Crime". [...]"*

### ii) Planning Policy Guidance Note 15 (PPG15) - Planning and the Historic Environment (1994)

PPG15 provides a full statement of government policies for the identification and protection of historic buildings, conservation areas and other elements of the historic environment. There is a general Government commitment to preserve the historic environment (paragraph 1.2).

Authorities are required, in considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses (paragraph 2.12). Further, it is stated at paragraph 2.4 that:

*"The design of new buildings intended to stand alongside historic buildings needs very careful consideration. In general it is better that old buildings are not set apart, but are woven into the fabric of the living and working community. This can be done, provided that the new buildings are carefully designed to respect their setting, follow fundamental architectural principles of scale, height, massing and alignment, and use appropriate materials. This does not mean that new buildings have to copy their older neighbours in detail: some of the most interesting streets in our towns and villages include a variety of building styles, materials, and forms of construction, of many different periods, but together forming a harmonious group. Further general advice on design considerations which are relevant to the exercise of planning controls is given in Annex A to PPG 1."*

The setting of listed buildings and conservation areas is referred to at paragraph 2.16:

*"Sections 16 and 66 of the Act require authorities considering applications for planning permission or listed building consent for works which affect a listed building to have special regard to*



certain matters, including the desirability of preserving the setting of the building. The setting is often an essential part of the building's character [...].

As the proposed development would be visible from local conservation areas, two further paragraphs are of particular relevance here, 4.19 and 4.20:

*"4.19 The Courts have recently confirmed that planning decisions in respect of development proposed to be carried out in a conservation area must give a high priority to the objective of preserving or enhancing the character or appearance of the area. [...]"*

*4.20 As to the precise interpretation of "preserve or enhance", the Courts have held (South Lakeland DC v Secretary of State for the Environment, [1992] 2 WLR 204) that there is no requirement in the legislation that conservation areas should be protected from all development which does not enhance or positively preserve. Whilst the character and appearance of conservation areas should always be given full weight in planning decisions, the objective of preservation can be achieved either by development which makes a positive contribution to an area's character or appearance, or by development which leaves character and appearance unharmed."*

There is a general Government commitment to preserve and enhance the historic environment. Although paragraph 4.20 is referring to developments within conservation areas, it clarifies the meaning of the terms preserve and enhance

**iii) The Department for Transport, Local Government and the Regions (DTLR – now DEFRA) and Commission for Architecture and the Built Environment (CABE) By Design. Urban design in the planning system: towards better practice (2000)**

This joint guidance pulls together what is recognised as good practice and the objectives of urban design. It identifies and elucidates the Objectives of Urban Design, as follows:

*"i) Character. A place with its own identity. To promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture."*

*ii) Continuity and Enclosure. A place where public and private spaces are clearly distinguished. To promote the continuity of street frontages and the enclosure of space by development which clearly defines private and public areas."*

*iii) Quality of the public realm. A place with attractive and successful outdoor areas. To promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including disabled and elderly people."*

*iv) Ease of movement. A place that is easy to get to and move through. To promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport."*

*v) Legibility. A place that has a clear image and is easy to understand. To promote legibility through development that provides recognisable routes, intersections and landmarks to help people find their way around."*

*vi) Adaptability. A place that can change easily. To promote adaptability through development that can respond to changing social, technological and economic conditions."*

*vii) Diversity. A place with variety and choice. To promote diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs."*

**iv) The English Heritage (EH)/Commission for Architecture and the Built Environment (CABE) Guidance on Tall Buildings (March 2003)**

The EH/CABE Guidance on Tall Buildings dated March 2003 provides the most current summary of the joint views of these two independent organisations. Architectural quality is identified as a criterion relevant to the evaluation of Tall Buildings since a tall building visible from many vantage points across the City must be of the highest architectural quality. The following points are enumerated in the March 2003 edition.

*2.1: "Tall buildings have to take into account many components of national and regional planning policy guidance as well as local policies. PPG1: General policy and principles and PPG13: Transport will always be relevant; PPG15: Planning and the historic environment and PPG16: Archaeology and planning are likely to be relevant in most cases. Use-specific policies, such as PPG3: Housing, will apply in some cases, and, as many schemes will contain a mix of uses, as encouraged by PPG1, more than one of these planning policy guidance notes may be relevant. Regional planning guidance will also need to be taken properly into account; in London, LPAC's Strategic Planning Advice on High Buildings and Strategic Views in London, endorsed by the Government in November 1999, will be particularly important, until it is superseded by the Mayor's London Plan. The increasing recognition of the importance of design quality as a consideration within the planning system, referred to above, is set out in PPG1 and the DETR/CABE publication By Design." [NB. This has now been superseded by the publication of The London Plan 2004.]*

*2.6: "In identifying locations where tall buildings would and would not be appropriate, local authorities should, as a matter of good practice, carry out a detailed urban design study. This should take into account historic context through a character appraisal. It should identify those elements that create local character and other important features and constraints, including streetscape, scale, height, urban grain, natural topography, significant views of skylines, landmark buildings and areas and their settings, including backdrops, and important local views, prospects and panoramas. Opportunities where tall buildings might enhance the overall townscape, or where the removal of past mistakes might achieve a similar outcome, should be highlighted."*

*2.8: "In areas identified as appropriate, or sensitive, to tall buildings, local authorities should consider commissioning more detailed, three dimensional urban design frameworks as supplementary planning guidance in support of the policies in the*

*plan. The potential impact of buildings of various heights and forms can be modelled to assess their effect on context including on other local authority areas, and on each other. This should help to inform the decision-making and place-making process."*

*3.1: "PPG1 sets out the requirement for proposals to be accompanied by a design statement, where appropriate. By Design provides good practice guidance [and] contains useful advice on the objectives of urban design and other considerations which should inform such a study. Where there are concurrent proposals for other tall buildings, or where others are likely to follow, the implications of these should be addressed by the study."*

*3.2: "Developments in presentation techniques and technology have made it easier to present realistic photomontage views of new building proposals. ... All proposals for tall buildings should be accompanied by accurate and realistic representations of the appearance of the building in all significant views affected, near, middle and distant, including the public realm and the streets around the base of the building. This will require methodical, verifiable 360 degree view analysis. Often it may be helpful to include relative height studies, to see what a scheme would look like in context at varying heights." And at 3.3: "Without representational material of this scope, quality, clarity and detail, it is not possible to carry out a proper assessment of the architectural quality of a tall building or of its effect on the immediate and wider context."*

**Evaluating tall building proposals**

*4.1: "Cities and their skylines evolve. In the right place, tall buildings can make positive contributions to city life. They can be first-rate works of architecture in their own right; some of the best post-war examples are now listed buildings. Individually, or in groups, they affect the image and identity of a city as a whole. In the right place they can serve as beacons of regeneration, and stimulate further investment. The design and construction of innovative tall buildings can also serve to extend the frontiers of building and environmental technology."*

*4.2: "However, by virtue of their size and prominence, such buildings can also harm the qualities that people value about a place. Where tall buildings have proved unpopular, this has generally been for specific rather than abstract or general reasons. In many cases one of the principal failings is that many were designed with a lack of appreciation or understanding of the context in which they were to sit." And at 4.4, "The CABE publication Design review sets out CABE's method of evaluating designs."*

At 4.6 the guidelines set out 'Criteria for Evaluation'. They concern, in outline:

*"i) The relationship to context."*

*ii) The effect on the whole existing environment, including the need to ensure that the proposal will conserve, or not damage or detract from World Heritage Sites and their settings, [...] Scheduled Ancient Monuments and their settings, Listed buildings ... Conservation Areas (etc)."*



- iii) *The relationship to transport infrastructure.*
- iv) *The architectural quality of the building.*
- v) *The contribution that the development will make to external and internal public spaces and facilities in the area.*
- vi) *The effect on the local environment, including microclimate.*
- vii) *The contribution made to the permeability of a site and the wider area ... to improve the legibility of the city and the wider townscape.*
- viii) *In so far as relevant to the planning decisions, function and fitness for purpose: the provision of a high-quality environment for those who use the buildings.*
- ix) *The sustainability of the proposal."*

Finally, at 5.1: *"Proposals for tall buildings should not be supported unless it can be demonstrated through the submission of fully worked-up proposals that they are of the highest architectural quality. For this reason neither CABE nor English Heritage consider that outline planning applications would be appropriate".*

## Regional

### v) RPG3B/9B: *Strategic Planning Guidance for the River Thames* (February 1997)

It is stated in RPG3B/9B, *Strategic Planning Guidance for the River Thames*, (GOL 1997) that the stretch of the Thames passing from Hampton to Crayford Ness, and through Central London, "makes an important contribution to London's image and status as a "World City". (para. 3.11)

Map 3 is entitled, "Focal Points, Key Landmarks and Enhancement Opportunities from Thames Strategy (GOL 1995)". Indicated on this map is a 'schedule of landmarks to the river scene' and 'enhancement opportunities'. Nine Elms is cited therein as 'Enhancement Opportunity' no. 16 and Albert Embankment as no. 18. Lying between these enhancement opportunities, immediately north of Vauxhall Bridge is Terry Farrell & Partners' M16 Building at Vauxhall Cross, which is cited as 'Important Landmark' no. 33, and it is illustrated as a 'Landmark' exemplar on page 8 of RPG3B/9B.

Paragraph 3.18 refers to the opportunities for striking architecture on landmark sites, and suggests that on such sites, "There is a place for "challenging" designs, and for variations in scale and height." It continues: "Dramatic visual statements and "landmark" buildings may be appropriate in exceptional cases and should be of the highest quality. They will need to demonstrate flair, imagination and a thorough understanding of the implications of the proposed development for the existing or anticipated future pattern of development, strategic and local views, and skylines."

### vi) *Thames Strategy – Kew to Chelsea*, Atkins (June 2002)

*Thames Strategy – Kew to Chelsea* was commissioned in 1999 by a steering committee that included the West London River Group, Greater London Authority (formerly Government Office for London and London Planning Advisory Committee), Environment Agency, English Heritage, English Nature, Port of London Authority and riparian boroughs. It covers the area between Kew and Chelsea and, reflecting the rich diversity of this stretch of the river, from the historic waterfront of Strand-on-the-Green to the industrial riverside of Nine Elms, promotes a long-term vision.

The following policy recommendations were made for the stretch of Thames between Chelsea Harbour and Chelsea Creek:

- Extend the river walk over creek/under railway bridge
- Pedestrian link across Battersea Railway Bridge
- Chelsea Harbour/Imperial Wharf as leisure/activity hub
- Increase use of the existing pier/river services
- Enhance Chelsea Creek environmental/heritage value
- Maximise public benefits from new development
- New station and public transport improvements

Since it is stated in *The London Plan* (2004): p. 193, para 4.72. that the Blue Ribbon Network "*replaces the London parts of RPG3B/9B (Strategic Planning Guidance for the River Thames)*", the strategic

potential of *Thames Strategy – Kew to Chelsea* should also be understood in relation to the overarching objectives of The London Plan.

### vii) GLA *London's Skyline, Views and High Buildings*, SDS Technical Report 19 (August 2002)

This report was prepared by DEGW for the GLA to examine the role of high buildings in London, and establish a planning framework governing their development. It was superseded by *The London Plan* (2004).

A distinction is made between commercial and residential buildings (see section 2.2.2) and that Landmark buildings "*may [...] assist in the legibility of the city*" (see 'Image', p. 3; and bullet point 'Landmark value', p. 12).

This is developed further at para 3.2.4, 'Landmark and Image Value':

*"Potential high building landmark locations will be found throughout London, but this does not imply that high buildings should be built at all of these. Landmark buildings are by definition non-thematic [n. 13, a building that is differentiated from the prevailing building typology] and to retain their landmark status they must be sparingly distributed. This immediately precludes locations within existing clusters."*

It also requires that potential locations are prioritised in terms of their relationship to the city overall.

*"Wider area landmark locations [...] A typical location is Chelsea Harbour, on a bend in the river where river views to and from the building are maximised. [...] By signifying a key location in the city, the high building as landmark marks out locations at which to expect publicly accessible amenity functions. [...] if there are no publicly accessible functions within the immediate vicinity of the building, the building itself should incorporate these at lower levels ... this building should potentially include some form of public viewing area at its upper level, where this can be achieved without compromising [...] security."*

This latter point is refined in relation to residential towers at point F, p. 50, where it is stated that:

*"Single buildings in London will be primarily residential. They have primarily 'landmark' and image value, providing relatively little in terms of the requirement for space in London, or contributing to intensification. Their local impacts require firm criteria to ensure positive impacts and reduce potential disruption [...]"*

The paragraphs on the 'Impact on Landmark Elements' and 'Set Pieces' (Appx IV, p. 89), provides speculative views showing the different impacts of a single building and city skyline. They are stated to be 'illustrative only' (p. 88).



## viii) The London Plan (February 2004).

The following sections are verbatim from section 4B of The London Plan:

**"4B designs on London**

4.34 Good design is central to all the objectives of this plan. It is a tool for helping to accommodate London's growth within its boundaries (Objective 1). Particularly given its strong growth, very high standards of design are needed to make London a better city to live in and one which is more attractive and green (Objectives 2 and 6). There is a strong link between good design and the attraction to economic investors to help create a prosperous city (Objective 3). Areas of social exclusion are usually associated with poor, hostile environments and far better, more inclusive design must form part of their regeneration (Objective 4). Excellence in design can also make higher densities a source of better, more varied and more sustainable environment in places of high accessibility and reduce the need to travel (Objective 5).

4.35 As London's population and economy grow, the existing fabric will need to be carefully maintained, and new spaces and buildings sensitively introduced. Good urban design gives order to space and beauty to buildings. Poor design results in inefficient and fragmented use of land and in buildings and spaces that make hostile and unattractive environments for citizens and communities.

4.36 This part is in two sections: first it looks at general design principles and then at specific design issues.

**1. Principles of design for a compact city****Policy 4B.1 Design principles for a compact city**

The Mayor will, and boroughs should, seek to ensure that developments:

- maximise the potential of sites
- create or enhance the public realm
- provide or enhance a mix of uses
- are accessible, usable and permeable for all users
- are sustainable, durable and adaptable
- are safe for occupants and passers-by
- respect local context, character and communities
- are practical and legible
- are attractive to look at and, where appropriate, inspire, excite and delight
- respect the natural environment
- respect London's built heritage.

These principles should be used in assessing planning applications and in drawing up area planning frameworks and

UDP policies. Urban design statements showing how they have been incorporated should be submitted with proposals to illustrate their design impacts.

**Policy 4B.2 Promoting world-class architecture and design**

The Mayor will seek to promote world-class design, by collaborating with partners to:

- promote improvements to London's public realm, for example through the Mayor's 100 Spaces for London programme
- promote community involvement and, through the involvement of the GLA Architecture and Urbanism Unit, competitive selection of designers and design-led change in key locations.

The Mayor will also work with partners to prepare and implement:

- design guidelines for London
- a public realm strategy for London to improve the look and feel of London's streets and spaces.

4.37 A compact city must maximise the potential of its sites. In order to absorb growth in population and jobs, London must achieve more intensive development in the right places (see Policy 4B.3). It must be designed and managed to ensure long-term efficient use, and in forms that are safe and sensitive both to their own operational needs and to their surroundings. Design quality is central to this and poorly designed schemes will squander London's valuable resources and can blight the lives of users and neighbours.

4.38 The public realm comprises spaces between, around and within buildings. It includes schemes such as the rejuvenation of Trafalgar Square and other projects in the Mayor's 100 Spaces for London programme that will help to improve key public spaces for Londoners. But incremental improvements to all parts of the public realm are also vital and every opportunity should be taken to achieve this.

4.39 Mixed-use development encourages a reduction in the need to travel long distances, by including a balance of housing, employment, commercial and other community facilities in the same area. Mixing uses can also help achieve intensive development by using the same space for more than one purpose. It contributes to vitality and safety by preventing areas becoming deserted and hostile. New developments should create or enhance a mix of uses within large buildings, within the development and/or between the development and its surroundings. Use of open space as well as buildings should be taken into account. Where mixed uses are problematic between housing and industrial areas, innovative design should be used to reduce noise and other nuisances. Chapter 3, Parts A and B encourage mixed use as part of predominantly housing or employment based developments. Chapter 5 indicates potential for mixes of use in many Opportunity Areas and other key development locations.

4.40 Developments should be safe and secure, taking into account the objectives of 'Secured by Design'1, 'Designing out Crime'2 and DOE Circular 5/94 'Planning out Crime'. They should also incorporate specific security requirements such as those relating to high-profile buildings and spaces. At the same time, buildings should not ensure their own safety by turning inwards and presenting a blank wall or fenced-in enclosure to the street, but should provide an urban environment where outward looking buildings and natural surveillance contribute to, and benefit from, life at street level.

4.41 Good design is rooted firmly in an understanding and appreciation of the local social, historical and physical context, including urban form and movement patterns and historic character. London is highly diverse and constantly changing, but developments should show an understanding of, and respect for, existing character. The Mayor has already produced some guidance on best practice for well-designed higher density housing3 and will produce Supplementary Planning Guidance on urban design.

4.42 Development proposals should show that developers have sought to provide buildings and spaces that are designed to be beautiful and enjoyable to visit, as well as being functional, safe, accessible, sustainable and inclusive for all. New building projects should ensure the highest possible space standards for users, in both public and private spaces inside and outside the building, creating spacious and usable private as well as public spaces. In particular, buildings should provide good storage and secondary space and maximise floor-ceiling heights where this is compatible with other urban design objectives.

4.43 London is a green city with rich biodiversity. Development proposals should respect and enhance the natural environment and incorporate greening and planting initiatives. They should identify new opportunities for creating private space for example, in roof gardens and terraces. They should ensure that opportunities to naturalise and green the urban environment, for example through tree planting, are maximised.

**Policy 4B.3 Maximising the potential of sites**

The Mayor will, and boroughs should, ensure that development proposals achieve the highest possible intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity. Boroughs should develop residential and commercial density policies in their UDPs in line with this policy and adopt the residential density ranges set out in Table 4B.1. The Mayor will refuse permission for strategic referrals that, taking into account context and potential transport capacity, under-use the potential of the site.

4.44 For commercial developments to fulfil Policy 4B.3, plot ratios should be maximised. For example, average site densities of at least 3:1 generally should be achieved wherever there is, or will be, good public transport accessibility and capacity. In highly accessible areas within central London and some Opportunity Areas, especially in the Thames Gateway area, ratios nearer to 5:1 can be achieved. The ability for plot ratios to be maximised at any



site or area will depend on local context, including built form, character, plot sizes and existing or potential public transport capacity. These should be assessed through area planning frameworks, or when individual proposals are submitted. The Mayor will provide further technical advice on appropriate plot ratios and their measurement and it should be noted that they are to be used as a tool to assess density consistently, not to provide specific numerical targets.

4.45 The Mayor will expect a maximum contribution towards housing provision to be achieved by checking that UDP reviews and planning applications referred to him are in conformity with the density matrix in Table 4B.1. The density matrix sets a strategic framework for appropriate densities at different locations. It aims to reflect and enhance existing local character by relating the accessibility of an area to appropriate development and the number of car parking spaces that should be provided.

4.46 The matrix is not static as it provides a tool for increasing density in situations where transport proposals will change the public transport accessibility ranking. Such changes allow a shift to a higher density range. [...]

4.47 Appropriate density ranges are related to location, setting in terms of existing building form and massing, and the index of public transport accessibility (PTAL). Site setting can be defined as:

- Central – very dense development, large building footprints and buildings of four to six storeys and above, such as larger town centers all over London and much of central London.
- Urban – dense development, with a mix of different uses and buildings of three to four storeys, such as town centres, along main arterial routes and substantial parts of inner London.
- Suburban – lower density development, predominantly residential, of two to three storeys, as in some parts of inner London and much of outer London.

4.48 Residential density figures should be based on net residential area, which includes internal roads and ancillary open spaces (see also Annex C of PPG3).

#### Policy 4B.4 Enhancing the quality of the public realm

The Mayor will work with strategic partners to develop a coherent and strategic approach to the public realm. Boroughs should develop local objectives and implementation programmes for their public realm. In doing so they should involve stakeholders, including their local communities. The Mayor will, and boroughs should, work to ensure the public realm is accessible, usable for all, meets the requirements of Policies 3A.14 and 4B.5, and that facilities such as public toilets are provided. Planning applications will be assessed in terms of their contribution to the enhancement of the public realm.

4.49 A strategic approach is needed to ensure consistency and

high quality in the design and management of public spaces and also to help make sure they are seen both as individual and linked entities to form a coherent public realm. Public spaces can contribute to good access for pedestrians and should offer inclusive access and ease of use. The highest quality of design in London's public places is needed to achieve a city that is more attractive, safer and easier to get around for everyone. This means ensuring the buildings that surround or house public places are appropriate, that the design, layout, furnishing and management of the public spaces themselves are of the highest quality and that facilities such as public toilets are provided. Natural planting and trees can enhance the public realm. Boroughs' open space strategies should reflect the requirements of this policy.

#### Policy 4B.5 Creating an inclusive environment

The Mayor will require all future development to meet the highest standards of accessibility and inclusion. UDP policies should integrate and adopt the following principles of inclusive design that will require that developments:

- can be used easily by as many people as possible without undue effort, separation, or special treatment
- offer the freedom to choose and the ability to participate equally in the development's mainstream activities
- value diversity and difference.

Boroughs should require development proposals to include an Access Statement showing how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed. These principles and the requirements of Policy 3A.14 should be adopted by all responsible for changing or managing the built environment.

4.50 A truly inclusive society demands an environment in which a diverse population can exist harmoniously and where everyone, regardless of disability, age or gender, can participate equally and independently, with choice and dignity<sup>4</sup>. The design, construction and management of the whole range of buildings, spaces, and places is a fundamental part of this.

4.51 Disabled people are not a homogenous group with identical needs. When the principles of inclusive design are applied from the beginning of the design process and the needs of disabled people are integrated with the needs of others, the building will also become accessible to other users of the built environment who are excluded through poor design or discriminatory attitudes. This includes children, young people and older people. The Mayor has prepared draft Supplementary Planning Guidance on creating inclusive environments.

#### Policy 4B.6 Sustainable design and construction

The Mayor will, and boroughs should, ensure future developments meet the highest standards of sustainable design

and construction and reflect this principle in UDP policies.

These will include measures to:

- re-use land and buildings
- conserve energy, materials, water and other resources
- ensure designs make the most of natural systems both within and around the building
- reduce the impacts of noise, pollution, flooding and micro-climatic effects
- ensure developments are comfortable and secure for users
- conserve and enhance the natural environment, particularly in relation to biodiversity
- promote sustainable waste behaviour in new and existing developments, including support for local integrated recycling schemes, CHP schemes and other treatment options (subject to Policy 4A.1 and 4A.2). Applications for strategic developments should include a statement showing how sustainability principles will be met in terms of demolition, construction and long-term management. Boroughs should ensure that, where appropriate, the same sustainability principles are used to assess planning applications.

4.52 Sustainable design and construction can reduce the consumption of resources, cut greenhouse gases and contribute to the good health of Londoners. Sustainable design is based on principles that are intended to ensure that buildings are efficient in resource use, recognise the uniqueness of locations, are healthy, adaptable and responsible in protecting the environment and make the most of natural systems including, for example the use of passive solar design or local ecosystems. Several of these issues are addressed through Building Regulation requirements and other procedures. This policy should sit alongside those requirements. The Mayor will work with partners to produce Supplementary Planning Guidance and to provide further information on relevant aspirational targets.

#### Policy 4B.7 Respect local context and communities

The Mayor will, and boroughs should, work with local communities to recognise and manage local distinctiveness ensuring proposed developments preserve or enhance local social, physical, cultural, historical, environmental and economic characteristics. In doing so, the requirements of Policy 3A.14 should be taken into account.

4.53 London has a great range of different types of places and spaces, as diverse and changeable as its cultural, ethnic and historical make-up. Those diverse places and spaces should be valued and enhanced. Engaging local communities in the development process will help to ensure that new buildings and spaces are welcomed and respected by local people, as well as integrated with local built form. A variety of environments should be protected and enhanced and boroughs should be sensitive to these local distinctions and work with local communities to



ensure they are sustained and enhanced. Good modern design can respect and add to local distinctiveness through both sensitive change and preservation.

## 2. The specifics of design for a compact city

### Policy 4B.8 Tall buildings – location

The Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London's character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings. The Mayor will, and boroughs should, consider all applications for tall buildings against the criteria set out in Policies 4B.1, 4B.3 and 4B.9. The Mayor will work with boroughs and the strategic partnerships to help identify suitable locations for tall buildings that should be included in UDPs and Sub-Regional Development Frameworks. These may include parts of the Central Activities Zone and some Opportunity Areas. Boroughs should take into account the reasons why the Mayor may support tall buildings when assessing planning applications that are referable to the Mayor. Boroughs may wish to identify defined areas of specific character that could be sensitive to tall buildings within their UDPs. In doing so, they should clearly explain what aspects of local character could be affected and why. They should not impose unsubstantiated borough-wide height restrictions. In considering applications for tall buildings, the Mayor will take into account the potential benefit of public access to the upper floors and may require such access.

4.54 Policies 4B.8 and 4B.9 should apply to all buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor. Boroughs may wish to set locally based thresholds for their tall building policies within their UDPs.

4.55 The compact city and intensive development does not necessarily imply high-rise buildings. London has achieved some of its highest residential densities in relatively low-rise areas, while isolated, poorly designed tower blocks have not necessarily delivered high density or usable public space.

4.56 However tall buildings can be a very efficient way of using land and can make an important contribution to creating an exemplary, sustainable world city. They can support the strategy of creating the highest levels of activity at locations with the greatest transport capacity. Well-designed tall buildings can also be landmarks and can contribute to regeneration and improve London's skyline.

### Policy 4B.9 Large-scale buildings – design and impact

All large-scale buildings including tall buildings should be of the highest quality design and in particular:

- meet the requirements of the View Protection Framework set out in Policy 4B.15 of this plan

- be suited to their wider context in terms of proportion and composition and in terms of their relationship to other buildings, streets, public and private open spaces, the waterways or other townscape elements
- be attractive city elements as viewed from all angles and where appropriate contribute to an interesting skyline, consolidating clusters within that skyline or providing key foci within views
- illustrate exemplary standards of sustainable construction and resource management and potential for renewable energy generation and recycling
- be sensitive to their impact on micro-climates in terms of wind, sun, reflection and overshadowing
- pay particular attention, in residential environments, to privacy, amenity and overshadowing
- be safe in terms of their own integrity and the safety of occupiers and have an acceptable relationship to aircraft, navigation and telecommunication networks
- be appropriate to the transport capacity of the area ensuring adequate, attractive, inclusive and safe pedestrian and public transport access • provide high quality spaces, capitalise on opportunities to integrate green spaces and planting and support vibrant communities both around and within the building
- where appropriate, contain a mix of uses with public access, such as ground floor retail or cafes
- relate positively to water spaces taking into account the particular needs and characteristics of such spaces.

4.57 Large-scale, intensively used buildings, including tall buildings, are likely to have greater impact than other building types because they tend to be more visible and generate a lot of movement and activity. They therefore need to be flexible and adaptable, and of exemplary design, in line with the above policy, in addition to the requirements of Policy 4B.1. Where Environmental Impact Assessments are required, they must include accurate visual modelling of proposals.

4.58 Tall buildings make a significant impact, not just locally, but across large parts of London. They also create the opportunity for magnificent views across the capital. Many tall buildings around the world have popular and successful public spaces on their top floors and the Mayor wishes to see more of such opportunities in London.

4.59 Tall buildings can have particular impacts on waterways. Proposals for tall buildings near the Blue Ribbon Network should meet the design requirements set out above and address the specific impacts on the water spaces. These impacts include those on hydrology, on the biodiversity of the water space and on the public realm of the waterside, particularly in terms of wind turbulence effects and visual appearance of canyonisation along watercourses.

## Built heritage and views

### Policy 4B.10 London's built heritage

The Mayor will work with strategic partners to protect and enhance London's historic environment. UDP policies should seek to maintain and increase the contribution of the built heritage to London's environmental quality, to the economy, both through tourism and the beneficial use of historic assets, and to the well-being of London's people while allowing for London to accommodate growth in a sustainable manner.

### Policy 4B.11 Heritage conservation

Boroughs should:

- ensure that the protection and enhancement of historic assets in London are based on an understanding of their special character, and form part of the wider design and urban improvement agenda, and that policies recognise the multi-cultural nature of heritage issues
- identify areas, spaces and buildings of special quality or character and adopt policies for their protection and the identification of opportunities for their enhancement, taking into account the strategic London context
- encourage and facilitate inclusive solutions to providing access for all, to and within the historic environment.

### Policy 4B.12 Historic conservation-led regeneration

The Mayor will, and boroughs should, support schemes that make use of historic assets and stimulate environmental, economic and community regeneration where they:

- bring redundant or under-used buildings and spaces into appropriate use
- secure the repair and re-use of Buildings at Risk
- help to improve local economies and community cohesion
- fit in with wider regeneration objectives
- promote inclusiveness in their design.

### Policy 4B.13 World Heritage Sites

The Mayor will work with the relevant boroughs, English Heritage and site owners and occupiers to prepare management plans for London's World Heritage Sites. UDPs and management plans should protect their historic significance and safeguard, and where appropriate enhance, their settings.

### Policy 4B.14 Archaeology

The Mayor, in partnership with English Heritage, the Museum of London and boroughs, will support the identification, protection,



interpretation and presentation of London's archaeological resources. Boroughs in consultation with English Heritage and other relevant statutory organisations should include appropriate policies in their UDPs for protecting scheduled ancient monuments and archaeological assets within their area.

4.60 Two thousand years of building have left layers of history, illuminating London's social, political and economic heritage. Today London has a great wealth of fine historic buildings, spaces and archaeology, including four World Heritage Sites and many buildings and sites of national importance that add to the capital's identity, attractiveness and cultural richness. The historic environment also helps to attract tourists, and provides valuable leisure opportunities and commercial and residential space, and is an important part of London's economy. The Mayor wishes to see the sensitive management of London's extraordinary historic assets planned in tandem with the promotion of the very best modern architecture and urban design. Designation of historic buildings is not enough. Sensitive management requires clear details of what needs to be protected, how and why. The Mayor expects boroughs and others to use appropriate tools to manage the historic environment, including character appraisals and conservation plans.

4.61 Much of London's historic inheritance is inaccessible, badly maintained or not viewed as relevant to local communities. The sensitive and innovative use of historic assets within local regeneration should be encouraged. Schemes such as Townscape Heritage Initiatives, Heritage Economic Regenerations Schemes and Buildings at Risk Grants and their successors, can play an important role in fostering the regeneration of historic areas (see Policy 4B.12).

4.62 Part of the city's unique character is the juxtaposition of many different types of buildings and spaces and this should be reflected in the way the historic environment is managed. Buildings and places should not be seen in isolation, and the settings of historic assets are often important to their character and should be appropriately protected.

#### Policy 4B.15 London View Protection Framework

The Mayor designates the selected set of strategically important views listed in Table 4B.2 to be managed in accordance with Policies 4B.16 and 4B.17. These policies will become operational when Strategic View directions are withdrawn (see below). The Mayor will keep the list of designated views under review. Views will only be considered for designation where:

- the viewing place is open, publicly accessible and well used, a place in its own right allowing for pause and enjoyment of the view
- significant parts of London, or significant buildings, would be visible
- the view is highly valued and allows for the appreciation and understanding of London as a whole, or of major elements within it, and does not replicate existing managed views without added benefit
- the view represents at least one of the following: a

panorama across a substantial part of London, a broad prospect along the river or a view from an urban space, including urban parks, which may be a linear view to a defined object or group of objects, which offers a cohesive viewing experience. Within designated views, the Mayor will identify strategically important landmarks where the landmark is easy to see and to recognise, provides a geographical or cultural orientation point, and is aesthetically attractive. Preference will be given to landmarks that are publicly accessible. The landmark should be a natural focus within the view although it does not have to be the only one. Boroughs should base the designation and management of local views in their UDPs on Policies 4B.15-4B.17.

**Table 4B.2 Views designated as part of the London View Protection Framework**

#### London panoramas

I From Alexandra Palace to central London

II From Parliament Hill to central London

III From Kenwood to central London

IV From Primrose Hill to central London

V From Greenwich Park to central London

VI From Blackheath Point to central London

#### River prospects

A Tower Bridge prospect

B London Bridge prospect

C Southwark Bridge prospect

D Millennium Bridge and Thames side at Tate Modern prospect

E Blackfriars Bridge prospect

F Waterloo Bridge prospect

G South Bank prospect

H Hungerford Footbridges prospect

I Westminster Bridge prospect

J Lambeth Bridge prospect

K Victoria Embankment between Waterloo and Westminster prospect

L Jubilee Gardens and Thames side in front of County Hall prospect

M Albert Embankment between Westminster and Lambeth Bridges along Thames path by the side of St Thomas's Hospital prospect

#### Townscape views

1 Bridge over the Serpentine, Hyde Park to Westminster

2 Island Gardens, Isle of Dogs to Royal Naval College

3 City Hall to Tower of London

4 St James's Park Bridge to Horse Guards Road

#### Linear views

a The Mall to Buckingham Palace

b St Paul's Cathedral from Westminster Pier

c St Paul's Cathedral from King Henry's Mound, Richmond

#### Policy 4B.16 View management plans

The Mayor will, in collaboration with strategic partners, prepare and review management plans for the views designated under Policy 4B.15. These plans should seek to:

- reflect the benefits of the view, helping to promote an appreciation of London at the strategic level and to identify landmark buildings and to recognise that it is not appropriate to protect every aspect of an existing view
- seek to enhance the view and viewing place in terms of access and the ability to understand the view
- prevent undue damage to the view either by blocking, or unacceptably imposing on, a landmark or by creating an intrusive element in the view's foreground or middle ground
- clarify appropriate development height thresholds
- protect backgrounds that give a context to landmarks. In some cases, the immediate background to landmarks will require safeguarding to ensure the structure can be appropriately appreciated
- be based on an understanding of its foreground, middle ground and background, landmark elements and the relative importance of each to the view in its entirety.

Management plans for different types of view will also be based on the following principles:

- River prospects. The management of these prospects should ensure that the juxtaposition between elements, including the river frontages and major landmarks, can be appreciated within their wider London context.
- Townscape and linear views. These views should be managed so that the ability to see specific buildings, or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, should be enhanced.
- Panoramas. Within these views, proposed developments, as seen from above or obliquely in the front and middle ground, should fit within the prevailing pattern of buildings



and spaces and should not detract from the panorama as a whole. The management of landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the landmark.

#### Policy 4B.17 Assessing development impact on designated views

The Mayor will, and boroughs should, assess development proposals where they fall within the assessment areas of designated views (listed below) against general principles of good design set down in this plan, local urban design policies, and the management principles in Policy 4B.16.

Assessment areas are:

- landmark viewing corridors
- front and middle ground assessment areas
- landmark lateral assessment areas
- landmark background assessment areas.

The Mayor will, and boroughs should, normally refuse or direct refusal of all development within the landmark viewing corridors above threshold heights (see Policy 4B.16), and development within landmark background and lateral assessment areas, which fails to preserve or enhance the ability to recognise and appreciate landmark buildings. The Mayor will, and boroughs should, normally refuse or direct refusal of developments in front and middle ground assessment areas that are overly intrusive, unsightly or prominent to the detriment of the view as a whole.

4.63 The Mayor values the importance of strategic views of London and its major landmarks. These views must be protected and managed in a way that enhances the selected number of genuinely important strategic views, but which also avoids creating unnecessary constraints over a broader area than that required to enjoy the view.

4.64 The Mayor proposes that the current views set down in Government Directions<sup>7</sup> should be replaced by this plan and forthcoming Supplementary Planning Guidance, which he will produce in collaboration with boroughs, English Heritage, the Royal Parks and other organizations represented at the EIP. The proposed view management plans will be an integral part of the proposed Supplementary Planning Guidance. The management of protected views as listed in Table 4B.2 will not become operational until the Supplementary Planning Guidance is published and the existing Strategic View directions are withdrawn by the First Secretary of State. However Policies 4B.15, 4B.16 and 4B.17 will take effect on publication of this plan, in so far as they will inform the development of the Supplementary Planning Guidance.

4.65 Applicants for planning permissions would be expected to provide visual representation of the effect of their proposals for new developments on views that may be affected once the Supplementary Planning Guidance has been published and existing Strategic View directions withdrawn. Before that time they should provide visual information depicting the impact of

their proposals on the existing Strategic Views.

4.66 Management plans should recognise the role of landmark buildings within the views and will set down appropriate development height thresholds, viewing corridors, assessment areas and townscape guidelines for each view. It may not be appropriate to apply all types of assessment areas to all views. View management plans will also encompass local control mechanisms where appropriate such as World Heritage Site Management Plans. In the case of River Prospects, design principles set down in Policy 4C.21 will be particularly important in terms of regulating the appearance of the river frontage that is vital to the success of River Prospects. Such design principles will be applicable within the Thames Policy Area. In general, the ability to see structures in the front, middle and back of the prospects allows for greater appreciation of the three-dimensional qualities of the views and the metropolitan setting of the river.

4.67 Mechanisms for the protection and enhancement of views are explained below. They are based on a number of different spatial areas within which development may affect the protected view. These are listed in Policy 4B.17 above. They cover sight lines, lateral spaces and backgrounds to landmarks and areas in the middle and front of the whole view width. Together they are referred to as view assessment areas. When boroughs receive proposals that could affect managed views they should consult other boroughs crossed by the same view. Further details on consultation mechanisms will be provided in Supplementary Planning Guidance. This will be complemented by the Mayor's referral powers that allow for a strategic overview to be taken on proposals that affect views in London. In all cases referable to the Mayor, accurate visual representations of changes to all views affected will be required. However, two-dimensional pictures tend to flatten views and the influence of distance on impact is often reduced. In addition to the effect of perspective on size, distance effects sharpness of focus, appearance of materials, colour and details. Applicants will be expected to make every effort to take these issues into account. The Mayor will investigate the development of a three dimensional computer model to help the assessment of proposals.

#### Landmark viewing corridors

4.68 The proposed sight lines to the landmarks of St Paul's Cathedral and the Palace of Westminster within the London panoramas are indicated on Map 4B.2. These sight lines create viewing corridors encompassing the landmark but not their wider setting within the panorama. The objective of the viewing corridors is to preserve the ability to see the landmark as a focus of the view but not to control their setting and they may be narrower than the existing Strategic Views.

#### Landmark lateral assessment areas

4.69 Map 4B.2 indicates the proposed position of landmark lateral assessment areas for London panoramas. These sit to the side of the landmark viewing corridor from the viewing place to St

Paul's Cathedral. They are not indicated for the Palace of Westminster as existing buildings in the view make them impractical. The objective of these assessment areas is to manage the wider setting of the landmark. Issues such as design, massing and relative prominence in the view will be relevant. There is no automatic presumption against new visible buildings in these areas. In particular a canyon effect from new buildings around the landmark should be prevented and the use of progressively higher threshold heights away from the landmark will be considered within the Supplementary Planning Guidance. These assessment areas are in line with the EIP panel's recommendation to include Wider Setting Consultation Areas and fulfil the purposes the panel suggested as appropriate for such areas.

#### Landmark background assessment areas

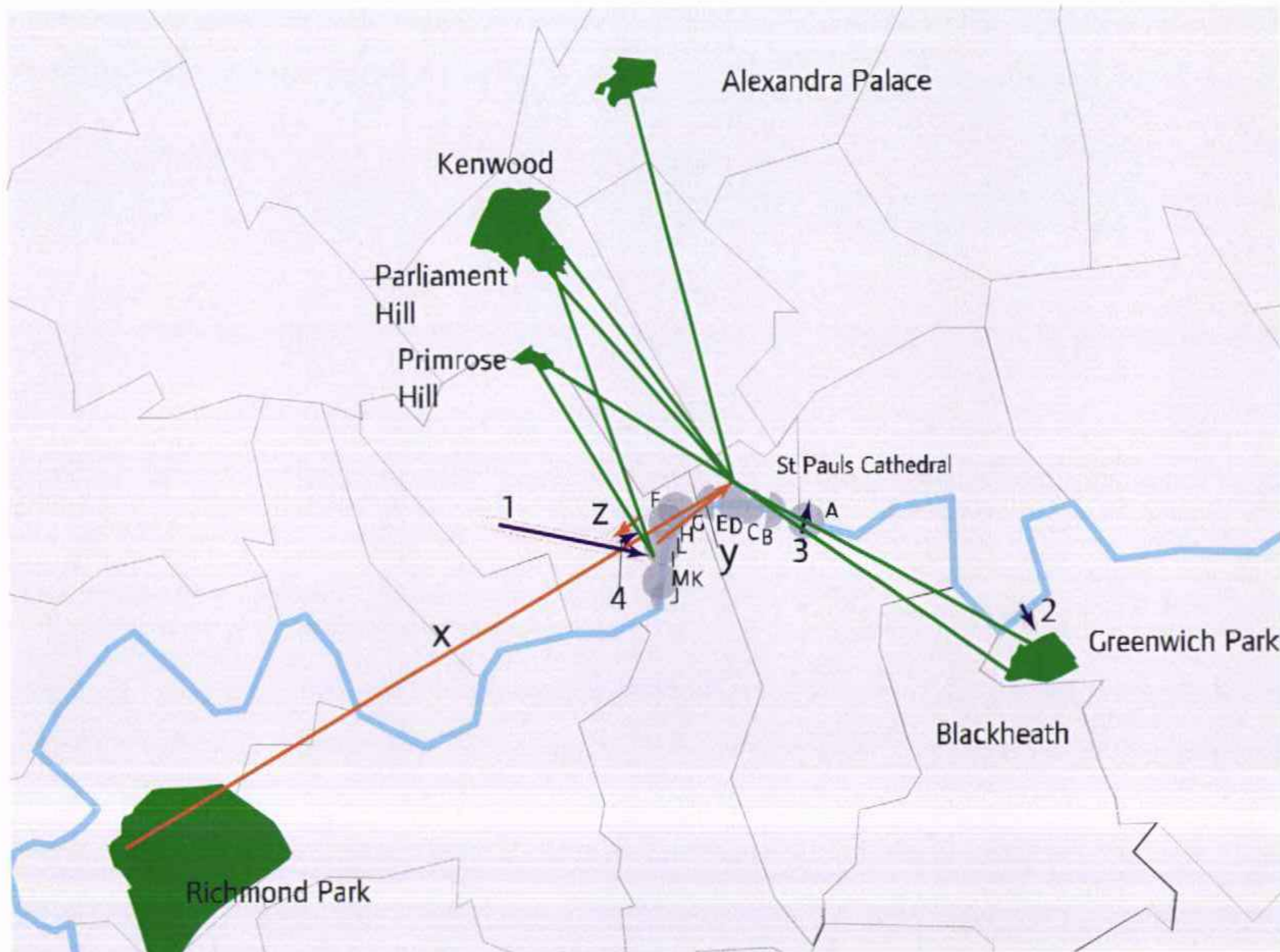
4.70 Map 4B.2 also indicates the proposed position of backdrop assessment areas for London panoramas. These have been formed by extrapolating the landmark lateral assessment area behind the landmark to the distance of the existing Strategic View Background Consultation Areas. The objective is to ensure the landmarks are visible and can be appropriately appreciated as a focus in the panorama. Buildings that would be visible from the viewing place and would fall within the background assessment area should preserve or enhance the ability to recognise and appreciate the landmark. This does not mean that all visible buildings should be prohibited and in some cases new visible buildings behind landmarks may be appropriate. Accurate visual representation of the impact proposals would have on the ability to recognise and appreciate the landmark will be required.

#### Front and middle ground assessment areas

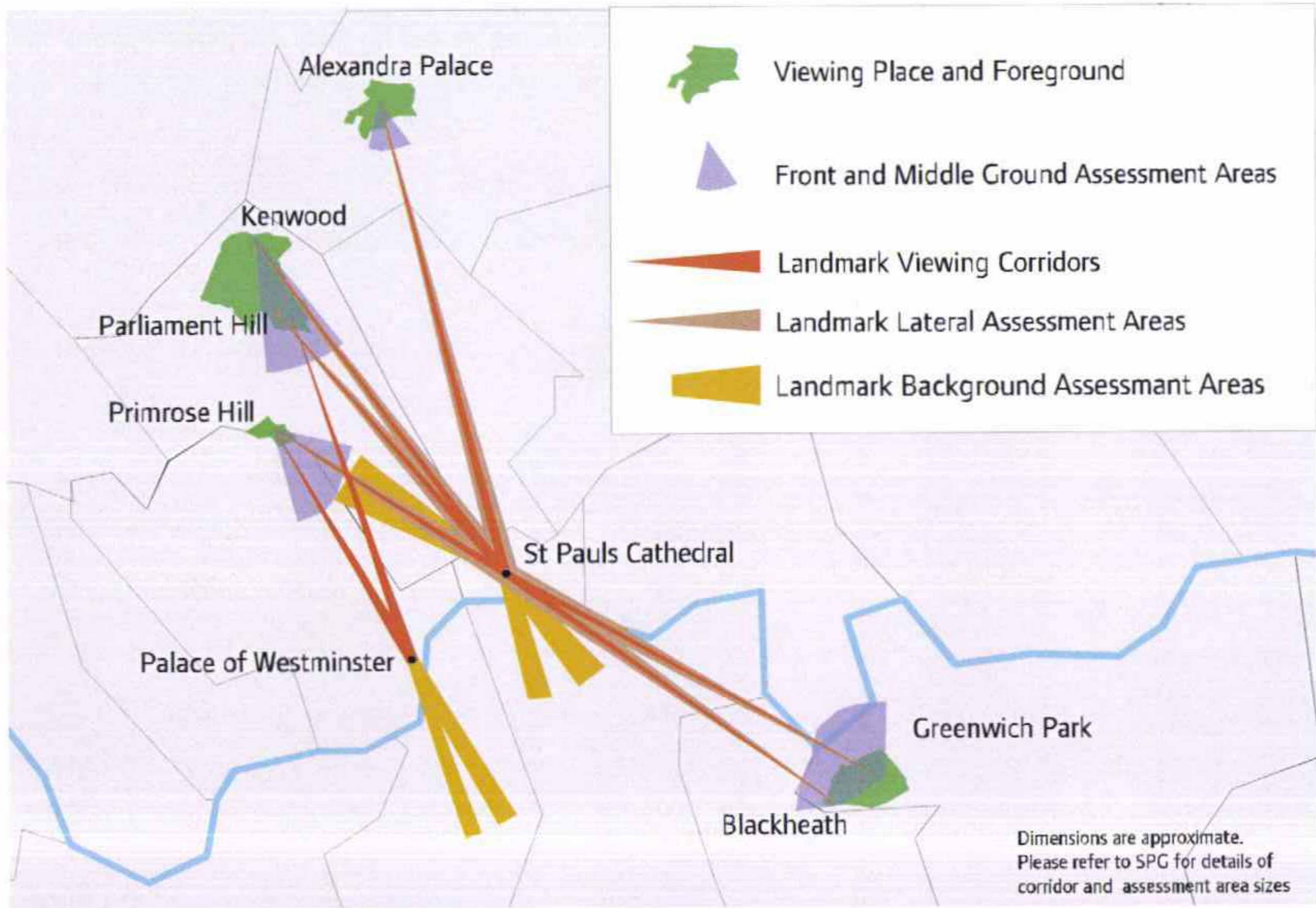
4.71 These areas cover the whole width of the views, not just the width of any landmark viewing corridors within them as indicated on Map 4B.2 for the panoramas. For the river prospects they are likely to cover the spaces and buildings immediately fronting the river and the embankments. For linear and townscape views they should encompass the parkland or viewing place and its frame in the direction of the viewing object. The objective of management is to prevent unsightly and overly prominent elements affecting these areas, such as intrusive block sizes, building heights, roof design, materials and colour, as they could disrupt the viewing experience. Not all such elements or alterations will need planning permission and the Mayor will work with those responsible for these areas to help ensure the appropriate management of the views.



Map 4B.1 View Protection Framework  
(Source: GLA)



Map 4B.2 Proposed London panoramas  
(Source: GLA)



- London River Prospects
  - A Tower Bridge, City Hall
  - B London Bridge
  - C Southwark Bridge
  - D Millennium Bridge
  - E Blackfriars Bridge
  - F Waterloo Bridge
  - G South Bank
  - H Hungerford Bridge
  - I Westminster Bridge
  - J Lambeth Bridge
  - K Victoria Embankment
  - L Jubilee Gardens
  - M Albert Embankment
- Sightline to Landmark Building
- Public Place
- ← Townscape Views
  - 1 Palace of Westminster from Hyde Park
  - 2 Royal Naval College from Isle of Dogs
  - 3 City Hall to Tower of London
  - 4 St James's Park to Whitehall and Horse Guards
- Linear Views
  - x St Pauls from Richmond Park
  - y St Pauls from Westminster Pier
  - z Buckingham Palace from the Mall



## References

- 1 Secured by Design, Association of Chief Police Officers Project and Design Group, 1994
- 2 Designing out Crime, RVG Clarke and P Mayhew, HMSO, 1980
- 3 Housing for a Compact City, GLA, February 2003
- 4 ODPM Planning and Access for Disabled People A Good Practice Guide 2003
- 5 Inclusive Projects: A guide to best practice on preparing and delivering project briefs to secure access. DPTAC 2003
- 6 Planning Policy Guidance Note 16: Archaeology and Planning
- 7 RPG3a, as amended by Annex 2 of Circular 1/2000

## 4C the Blue Ribbon Network

4.72 This part of the London Plan sets out policies for the Blue Ribbon Network. It replaces the London parts of RPG3b/9b (Strategic Planning Guidance for the River Thames). It also recognises the inter-relationships of all of London's waterways and water bodies by extending policy to cover the whole network rather than just the Thames.

4.73 This part is in seven sections:

- the first sets out the Blue Ribbon Network Principles
- the second defines the Blue Ribbon Network
- the third looks at natural resources, forces and human heritage
- the fourth looks at sustainable growth principles
- the fifth at enjoying the Blue Ribbon Network
- the sixth examines design
- the last looks at London's water spaces.

4.99 The following locations, which are identified as Opportunity Areas or Areas for Intensification (see Chapter 5) include or adjoin parts of the Blue Ribbon Network. "Opportunity Areas Relevant water spaces" includes "Vauxhall/Nine Elms/Battersea Thames".

## 6 Design

Policy 4C.20 Design – starting from the water

The Mayor will, and boroughs should, seek a high quality of design for all waterside development. All development, including intensive or tall buildings, should reflect local character, meet general principles of good urban design and improve the quality of the built environment. In addition, development should integrate successfully with the water space in terms of use, appearance and physical impact and should in particular:

- include a mix of uses appropriate to the water space,

including public uses and open spaces, to ensure an inclusive accessible and active waterside and ground level frontage

- integrate into the public realm, especially in relation to walking and cycling routes and borough open space strategies. Public art will often be appropriate in such locations as well as clear signage, information and lighting to promote the use of waterside spaces by all
- incorporate built form that has a human scale of interaction with the street, public spaces and waterside and integrates with existing communities and places
- recognise the opportunity to provide landmarks that are of cultural and social significance along the waterways, providing orientation points and pleasing views without causing undue harm to the cohesiveness of the water's edge
- relate successfully in terms of scale, materials, colour and richness of detail, not only to direct neighbours but also to buildings on the opposite bank and those seen in the same context with the River Prospects (see Policy 4B.15) or other locally identified views. Such juxtaposition of buildings should take into account river meanders and the impact these can have on how buildings may be seen together
- incorporate sustainable design and construction techniques, in particular a precautionary approach to flood risk.

4.119 The quality of the built environment alongside the rivers and waterways makes an important contribution to London's image and status as a world city. Every stretch of the waterways has its own character and this needs to be reflected in the design of new development.

4.120 Water space needs to be set at the heart of consideration of development along the waterside – the water must be the starting point. The emphasis on context does not mean that a uniform blandness for the areas around water spaces is sought or that new forms of development are not appropriate, but rather that the waterside should be regarded as a scarce resource and development should achieve a balance between the roles identified in the Blue Ribbon Network Principles.

## Policy 4C.21 Design statements

For all major development proposals within the Thames Policy Area and adjacent to the rest of the Blue Ribbon Network, the Mayor will, and boroughs should, ensure that development is attractive and appropriate. Developers should prepare assessments to cover:

- impacts of scale, mass, height, silhouette, density, layout, materials and colour
- proposals for water edge, visual and physical permeability and links with hinterland, public access, including addressing safety provision, landscaping, open spaces,

street furniture and lighting

- impacts of the proposal on the water space to demonstrate how the water space will be used and affected including impacts on biodiversity and hydrology
- impact on river prospects and any other locally designated views.

4.123 Views to and from the waterways are especially significant because the openness of water spaces allows for relatively long-distance views. The Mayor's policies for the new views framework for London recognise the special value of views from and across the Thames.

4.124 Boroughs may also wish to designate local views related to water spaces. The quality of the development along the edges of the water spaces will be of particular importance to these views. Policies for design are set out in Chapter 4, Part B.

4.125 The meandering course of the Thames, as well as other rivers, can give additional emphasis to the location of tall buildings adjacent to water spaces. There are a number of distinct adverse effects that tall buildings can have when located next to water. These include the impacts of overshadowing, wind turbulence and creating a visual canyon. The design of tall buildings along the Blue Ribbon Network needs to address these effects (see Policies 4B.8 and 4B.9)."



## Local

### ix) London Borough of Hammersmith and Fulham UDP adopted in August 2003

The provisions of the London Borough of Hammersmith and Fulham UDP relevant to my evidence are set out below.

Policy G3: Environment states that:

*"The council will seek to conserve, protect and enhance the quality, character and identity of the borough's built and open environment; and to address wider environmental issues such as the sustainability of development and growth, global warming, and resource and energy conservation, as far as possible through local land-use and transportation planning in the following ways:*

*(a) preserving and enhancing buildings and areas of special character; EN1-7, EN31, Site 19, Site 36, Site E*

*(b) requiring new development to create a safe and secure environment, be of a high standard of design that will contribute to enhancing the townscape of the locality, be compatible with the scale and character of the surroundings, and respect important local and long-distance views; EN8-15, EN21, EN31"*

In Part 2 of the UDP, policy EN2 Development in conservation areas states:

*"Development within conservation areas, including alterations or additions to existing buildings, will only be permitted if the character or appearance of the conservation area is preserved or enhanced. Particular regard will be given in the design of new developments to details such as the scale, massing, bulk, height, materials, colour, vertical and horizontal emphasis, and the relationship to adjoining buildings, the street building line and open spaces. New developments in conservation areas must, where possible, respect the historic context, volume, scale, form, materials and quality. These will be matters of particular importance to the historic context."*

Policy EN2B. Effect of development on the setting of conservation areas and views into and out of them states:

*"Development (including development outside conservation areas) will only be permitted if the character or appearance of the conservation areas in terms of their setting and views into or out of them is preserved or enhanced."*

*4.59 Views are a key element in the townscape and setting of conservation areas, and in the definition of their special character. Development should not negatively impact upon the quality of important views by obscuring them, introducing inappropriate elements to the foreground or background or affecting the townscape composition within. Important views in conservation areas are defined in the relevant Conservation Area Character Profile."*

Policy EN3. Listed buildings states:

*"The council will protect buildings of special architectural or historic interest which are contained in the Department of Culture, Media and Sport's statutory list. The presumption in favour of preserving listed buildings will be reflected by not*

*normally permitting their demolition, nor will alterations or extensions to them be permitted where their special architectural or historic interest would be adversely affected. Permission will not normally be granted for any development which would not preserve the setting of any listed building."*

Policy EN8. Design of new developments states:

*"Development will not be permitted unless it is of a high standard of design, and compatible with the scale and character of existing development and its setting. The use of innovative and contemporary materials will be welcomed, provided these enable the design to be sensitively integrated into the existing built form and landscape. All proposals must be formulated to respect:*

*(a) the, historical context of the area and its sense of place; and*

*(b) the scale, mass, form and grain of surrounding development; and*

*(c) the relationship of the proposed development to the existing townscape, including the local street pattern and landmarks and the skyline and skyspace; and*

*(d) the prevailing rhythm and articulation of frontages; and*

*(e) local building materials and colour; and*

*(f) locally distinctive architectural detailing [...]."*

Several paragraphs of text accompanying this policy are relevant here:

*"4.73 Visual variety and interest in an area often stem from the existence of a range of uses. Developments should be designed so as to encourage a variety of compatible uses in an area, thus increasing its vitality. As far as possible, the potential for easily adapting a building for other uses should be a consideration in its design."*

*4.74 Buildings should have a visual identity appropriate to their location and intended use. A new development should make visual sense to the people who are to use it. It should be designed to help people to identify its spaces and routes."*

*4.75 The council will encourage development which visually enhances the borough, and avoids harm by ensuring that the bulk and massing of schemes are appropriate in relation to the surroundings. In the general assessment of bulk and massing, full consideration will be given to amenities of neighbouring properties against planning Standards S3, S12 and S1."*

*4.76 Views within the borough are key elements in determining the character of the townscape and contribute to the interest of areas. The council will seek to ensure that proposed development does not harm these views in terms of location, scale and massing. The council will ensure that significant views in and out of conservation areas shall be safeguarded (see EN2B). Development along the riverside has great prominence due to the openness of the location and should therefore be of the highest quality. The council will ensure that development which affects the River Thames pays due regard to the riversides' distinctive character, and is of a bulk, massing, scale and appearance which is appropriate to its surroundings (see also EN31X)*

*4.78 New buildings should not normally depart from the general pattern of existing streets, building bulk and height already existing in the area. High buildings will need specific justification (see policy EN9). This does not necessitate a pastiche or backward looking approach to design, and the council welcomes imaginative quality solutions for the development of sites. A balance is required and a sensitivity to the locale to generate an appropriate design which will enhance the townscape."*

Policy EN9. High Buildings states:

*"A new building significantly higher than most of the surrounding buildings or in excess of 20 metres will not normally be acceptable unless it meets all the following requirements:*

*(i) It does not adversely affect the character of a conservation area.*

*(ii) It does not adversely affect the character of any area from which it would be seen, including open spaces, the river or riverside.*

*(iii) It does not adversely affect the Strategic View from Richmond Park (King Henry VIII's Mound) to St. Paul's Cathedral as identified on the Proposals Map.*

*(iv) It does not affect any other important view, including that of Central London from Sawyers Hill or a local view or landmark or views from or towards the River Thames, its bridges or the riverside.*

*(v) It does not affect the setting of a building on the statutory list or Local Register.*

*(vi) It should enhance the townscape and, if located on a riverside site, be clearly justified for townscape reasons. [...]."*

The following paragraph of text accompanying this policy is relevant to the tall residential riverside towers of the proposed development:

*"4.92 The council's opinion is that over much of the borough high or higher buildings are unlikely to be appropriate. Where proposals are made they must, of course, be considered on their merits, and the council will assess carefully whether, in the case of very well designed buildings, there could be a real benefit to the townscape. On riverside sites, in particular, the council considers that high buildings would not normally be appropriate to the character of the river or riverside. The general height of buildings on riverside sites is low- to medium-rise and so the river has an open character, not dominated by high buildings. In considering any applications for high buildings in the borough, the council will be particularly concerned to consider the opinions of local people."*

*4.93 In addition, the council will also consider whether the quality of the local environment is likely to be affected detrimentally as a result of wind turbulence associated with the erection of high buildings. This can lead to uncomfortable conditions for pedestrians around the base of the building, but the wind effect is not simply related to height, and other design elements may be important."*



Policy EN31. Important views along, across, and from, the river states:

*"1. Development within the Thames Policy Area will not be permitted if it would cause demonstrable harm to the view from the following points:*

*(a) From Hammersmith Bridge, the view along the river, foreshore, and riverside development and landscape between Hammersmith Terrace to the west and Fulham Football Ground to the south*

*(b) From Putney Bridges, the views along the river, foreshore and riverside, extending upstream from All Saints Church and its environs, along bishops park as far as Fulham Football Ground, and from Putney Railway Bridge the view downstream to the grounds of the Hurlingham Club*

*(c) From Wandsworth Bridge, the view up and downstream of the river, its foreshore and banks, and of commercial wharves and riverside buildings*

*2. Development will also not be permitted if it would cause demonstrable harm to the view from within the Thames Policy Area of any of the following important local landmarks identified on the Proposals Map, or their settings:*

*(a) Upper and Lower Mall. The richness, diversity and beauty of the historical waterfront which includes Hammersmith Terrace, Kelmscott House and neighbouring group of listed buildings, and the open space of Fumival Gardens allowing views of the skyline of Hammersmith and the spire of St. Paul's Church,*

*(b) Bishops Park. The parallel avenues of mature London plane trees and dense shrubbery which define the character of this important open space and the riverfront*

*(c) Grounds of the Hurlingham Club. The landscaped edge of the grounds providing glimpsed views to the listed Hurlingham House*

*(d) Hammersmith Bridge. The fine example of a suspension bridge is particularly dominant, and is an important landmark along this stretch of the river*

*(e) Putney Bridge and the adjacent All Saints Church."*

Paragraphs 4.160 to 4.165 of the supporting text state as follows:

*"4.160 Much of the riverside and all of the river within the borough lies within designated conservation areas. The borough has published Conservation Area Character Profiles for all its riparian conservation areas. There are numerous listed buildings, historic parks and historic townscapes with strong ties with the river within the borough and it is important that their setting and relationship with the river is preserved.*

*4.161 In addition to the general design policies in the Plan, development on the riverside needs to respect the unique character of the river. The aim is to secure a special quality for all new development on the river and riverside, and where appropriate to enhance the vitality of the riverfront and include river-related uses that attract the public. There is a need to consider the design of individual buildings as well as the spaces around them and broader urban design issues. This must be*

*done with a full understanding of the context and local character of the area.*

*4.162 The views afforded by the open nature of the riverfront are important in determining the character of each stretch of the riverside in the conservation areas, and will therefore be crucial in assessing the acceptability or otherwise of development proposals along the river's edge. In line with Strategic Guidance, the council has identified a number of views across and along the river which are important to the local scene and which are to be protected. The council has included in this list of important views, all river edges of historical significance, corridor views of particular importance and views towards important landmarks. The views towards specific landmarks can be enjoyed from various viewpoints along the riverside. These views will vary in nature and content, as the viewpoint changes. Locations have been marked on the Proposals Map which represent the longest viewing point towards each landmark.*

*4.163 The landmarks identified include bridges, areas of open space, and groups of buildings along a historic riverfront. All have strong links with the river and it is important that their setting and relationship with the river is preserved. Bridges are particularly important landmarks. They subdivide the river, and help to define the character of each stretch. Furthermore, bridges are important vantage points and command extensive views along the riverside.*

*4.164 The council is aware that the landmarks identified are also enjoyed in important views from outside the borough boundary, and will ensure that these are fully considered when assessing the impact of any development which may impinge on these views.*

*4.165 The council is a member of the Steering Group of riparian boroughs, the Government Office for London, the Environment Agency, the Port of London Authority and local societies, set up to prepare a comprehensive strategy for the River Thames between Kew and Chelsea. The Thames Strategy has identified a number of views within the designated study area. The identification of views and landmarks is continuing within the ambit of the Strategy and this will be addressed when the Plan is next reviewed."*

Policy EN31X. Design of development within the Thames Policy Area states:

*"Development will not be permitted within the Thames Policy Area unless it respects the riverside context, is of a high standard of urban design and maintains or enhances the quality of the built environment. Schemes that meet these requirements, and, by their design, contribute to creating an attractive, safe and interesting riparian environment will be welcomed."*

Paragraph 4.168 of the supporting text states:

*"4.168 The council will use the new Thames Strategy - Kew to Chelsea to deliver detailed appraisals of the Thames and its environs within the Thames Policy Area. The Strategy identifies numerous qualities of the Thames Policy Area including:*

*(i) the individual character of reaches within the borough*

*(ii) areas, sites, buildings, structures, landmarks, skylines, landscapes and views of particular sensitivity and importance*

*(iii) development sites and regeneration opportunities*

*(iv) sites of ecological importance*

*(v) sites of archaeological importance*

*(vi) focal points (existing and proposed) of public activity*

*(vii) public access and recreation opportunities".*

#### **x) Royal Borough of Kensington and Chelsea UDP adopted in May 2002**

The provisions of the Royal Borough of Kensington and Chelsea UDP that are relevant to my evidence are provided below.

RBKC has adopted the following overall aim for its Strategic Policies:

*"To maintain and enhance the character and function of the royal borough as a residential area and to ensure its continuing role within the metropolitan area as an attractive place in which to live and work."*

Regarding policy CD1, it is stated that:

*"4.2.3 By virtue of its character and appearance the Thames and foreshore constitutes one of the greatest of all London's areas of metropolitan importance. The boundary of the area has been enlarged to include Chelsea Creek and the Worlds End Estate. It is also contiguous with those of the London Borough of Hammersmith & Fulham and Westminster City Council (see Map 3). It is also a site of metropolitan importance for nature conservation. The Council has designated the whole of the Thames within the Borough boundaries as a conservation area and produced a proposals statement. Its detailed guidance should be referred to in consideration of any proposals affecting the Riverside. The proposals statement will be updated to reflect the advice contained in RPG3B/9B. The Thames Strategy - Kew to Chelsea, is currently in preparation and the Council will consider its adoption as supplementary planning guidance in due course.*

*4.2.4 The greater part of the stretch of the Thames lying within the Borough is bounded by Chelsea Embankment which carries extremely heavy traffic. As opportunities arise, the Council will implement environmental improvement schemes, to enhance the setting of the Embankment."*

Regarding policy CD2 it is stated that:

*"4.2.5 In considering proposals for Riverside development, the Council will also take account of views from the opposite bank of the Thames. It is equally important that adjoining Boroughs, in considering applications for development take account of views across and along the river from this Borough. The Council is concerned that development by virtue of its height, scale, bulk, massing and detailed design may adversely affect views from Chelsea."*



In relation to policy CD6 it is stated that:

*"4.2.10 The character of the Riverside owes much to the buildings and open spaces which adjoin it. The Royal Hospital and its grounds, the Chelsea Physic Garden and the buildings on Cheyne Walk are of particular importance. The character changes to the west with the World's End Estate and industrial buildings on Lots Road. The high buildings of the World's End Estate are not in character with the remainder of the Riverside and should not be seen as a precedent for similar developments. Any new development should enhance the special character of the Riverside. To achieve this objective the Council will, on appropriate sites encourage developers to provide a mix of uses, including public uses, especially on the lower floors fronting the river. New development should also provide a safe and interesting environment. Design quality and sensitivity to local context are also important. Adequate pre-application consultation should be undertaken and design statements will be required with all applications, the content of which should follow the advice contained in RPG3B/9B."*

Policy CD16 refers to promoting the appreciation of cemeteries in the Royal Borough. Paragraph 4.2.21 in relation to that policy states:

*"4.2.21 Two other principal open spaces in the Royal Borough are the cemeteries, dating back to the 1830's and designated as Metropolitan Open Land. They were conceived as places of beauty, of botanic and other interest. Both have been designated as conservation areas. They are social and historic "documents", also worthy of conservation as nature reserves, botanic gardens and sculpture parks. The Council will promote their appreciation by, for example, encouraging improved access, landscaping, paths, signs and visitor information, but at the same time ensure that their character is not unduly affected by greater numbers of visitors or new visitor facilities."*

It is stated in relation to policy CD25 that Brompton Cemetery is included in the Register of Parks and Gardens of Special Historic Interest in England compiled by English Heritage. This policy is concerned to protect parks and gardens of special historic interest from development which would have an adverse effect on the site, setting or enjoyment of any part of their grounds and to encourage the maintenance of their historic character.

With reference to standards of design, it is stated in relation to policy CD27 that:

*"4.3.2 The Council is concerned that the quality of architectural design of development in all areas of the Borough should be of a high standard. Development may also provide opportunities for environmental benefits such as sitting-out, sports or landscaped areas."*

In relation to CD28 and the urban design requirement that development be physically and visually integrated into its surroundings, it is stated in relation to this policy that:

*"4.3.3 Quality in urban design is an essential component in the control of development. It includes the relationship between different buildings; the relationship between buildings and the streets, squares, parks, trees and other vegetation, waterways and other spaces which make up the public domain; the nature*

*and quality of the public domain itself; the relationship of one part of a city with other parts; and the patterns of movement and activity which are thereby established.*

4.3.4 The policy below is intended to reinforce and enhance the traditional urban pattern of the Royal Borough in a number of ways:

- *By maintaining free movement, particularly of pedestrians, through the streets of the Borough (permeability);*
- *By preserving and creating features which contribute in a positive way to the legibility of the built environment (that is, the way the urban environment is recognised and understood) including landmarks, building lines, open spaces, views, vistas and key locations such as important cross roads, shopping centers or public gathering places;*
- *By ensuring visually interesting and secure streets by the provision of active frontages in appropriate locations, the maintenance of defensible space, and the provision of appropriate uses and design of upper floors to ensure informal surveillance of the public realm;*
- *By preserving and creating those features which contribute to the special character of the Royal Borough."*

With regard to high buildings, and protecting views and vistas, it is stated in relation to policy CD37 that:

*"4.3.29 The skylines and roofscape of large areas of the Royal Borough are sensitive to illconsidered change. Existing high buildings will not be considered as precedents. LPAC has published a study of high buildings in London as a guide to draft strategic planning advice. In considering proposals for high buildings, the Council will have regard to this advice. Policy CD31 will be applied to extensions to existing high buildings as well as new development.*

*4.3.30 The Council's policies on views and vistas are contained in other sections of the Conservation and Development Chapter. [...] In applying these policies, account will be taken of circumstances where the subject of a view or vista may be compromised by a new development immediately to one side or behind as much as a building constructed in front. The Council will produce Supplementary Planning Guidance for those areas where skylines and vistas are important to the Borough's townscape and historic character."*

In relation to policy CD57 a list of conservation areas and Conservation Area Proposals Statements appears in Appendix 1; Map 3 on p. 86 of the UDP identifies the boundaries of these areas; and a UDP Proposals Map is provided at the end of the document that also locates the Royal Borough's conservation areas.

In relation to policy CD58 refers to the environment of conservation areas and the contribution made not only by the fabric of existing buildings, but also the ambience created by trees and gardens, walls and railings, external features and materials it is stated that:

*"[...] The mix of land uses may contribute to the character of an area and in retail streets the design of shopfronts and signs are important."*

As for considering the effect of proposed development on Conservation Areas referred to in policy CD63, it is stated on p. 87 at paragraph 4.5.9 that:

*"[...] Residents' appreciation and enjoyment of the special character and appearance of conservation areas derives from both public viewpoints and views from within their dwellings. In applying these policies, the Council will consider not only the street scene, but views from other buildings and gardens, as these are also important to residents' amenities. In particular, careful regard will be had to the content of Conservation Area Proposals Statements."*

Finally, regarding housing densities, policy H12 refers to the need refers to the need for a balance that has to be struck:

*"[...] between making the best use of residential land, ensuring new housing is of a good standard, and protecting the character and environment of surrounding areas."*