

# BUILDING HEIGHT IN THE ROYAL BOROUGH

– A SUPPLEMENTARY PLANNING DOCUMENT



THE ROYAL BOROUGH OF  
KENSINGTON  
AND CHELSEA



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### STATUTORY DOCUMENT

This Supplementary Planning Document (SPD) has been subject to public consultation, which was conducted in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 and the Council's adopted Statement of Community Involvement. The revised document has been agreed by Key Decision on **15 September 2010** and is now the Council's adopted SPD for considering tall building proposals within the Royal Borough of Kensington and Chelsea.

Should you require any further information on the contents of the SPD or have any questions relating to a planning submission or pre-application discussions involving tall buildings, please contact the Planning Line on **020 7361 3012** or email [planning@rbkc.gov.uk](mailto:planning@rbkc.gov.uk)

For further information on the Local Development Framework (LDF) process or consultation arrangements, please call the LDF hotline on **020 7361 3879** or email the above address.

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# 1 INTRODUCTION

“Skylines are urban signatures... Cities of all descriptions and periods raise aloft distinctive landmarks, to celebrate faith and power and special achievement”.<sup>1</sup>

## PURPOSE OF THE DOCUMENT

**1.1** This document sets out supplementary planning policy for building heights in the Royal Borough of Kensington and Chelsea and particularly in relation to tall buildings. It does not create policy. It provides an analysis of the physical context of the Royal Borough and guidance, elaborating upon the policies used to determine planning applications for new large scale buildings in Kensington and Chelsea, particularly tall buildings, as set out in the Council’s statutory development plan.<sup>2</sup>

**1.2** The guidance identifies at the strategic level those parts of the Royal Borough that are unable or less able to absorb the impacts of tall buildings, and describes the positive tests that new proposals for tall buildings should satisfy. It provides a checklist of design issues that applicants of tall buildings must address in their planning submissions, and advises discussions with the Council at an early stage. Outline planning applications for tall buildings in the Royal Borough are not accepted.

**1.3** The Supplementary Planning Document (SPD) forms part of the Local Development Framework (LDF) and will be used in the determination of planning applications. The SPD is supplementary to Strategic Objectives **CO5** and **CL2** of the Core Strategy and to policies **Strat10**, **CD1-2**, **CD8-11**, **CD13-15**, **CD17**, **CD27-28**, **CD57** and **CD61-63** of the adopted UDP.<sup>3</sup>



## DEFINITION OF TALL BUILDINGS

**1.4** The London Plan defines tall buildings as “buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline”.<sup>4</sup> Tall buildings are taller than the overall building height in an area. Thus, a 6-storey building might be a tall building in a predominantly 2-storey suburban area, but of a common height in a metropolitan city centre. Tall buildings must therefore be considered in relation to their local context and measured on a proportional basis. For the purposes of applying this guidance tall buildings are 1½ times or more the height of their context. In a typical part of the Borough, such as a Victorian terraced street, this would be 23m or above, though this will depend on the context.<sup>5</sup>

### Methodology and structure of the document

**1.5** English Heritage and Commission for the Built Environment (“CABE”)’s joint guidance on tall buildings encourages local planning authorities to include specific policies for tall buildings in development plans clearly identifying, in map-based form, areas which are appropriate, sensitive or inappropriate for tall buildings. This ensures that “tall buildings are properly planned as part of an exercise in place-making informed by clear long-term vision, rather than in an

ad hoc, reactive, piecemeal manner”.<sup>6</sup> The London Plan also suggests that boroughs may wish to identify defined areas of specific character that could be sensitive to tall buildings within their development plans.<sup>7</sup>

**1.6** The London Plan indicates that boroughs should explain what aspects of local character tall buildings could affect and “not impose unsubstantiated borough-wide height restrictions”.<sup>8</sup> Furthermore, English Heritage and CABE’s joint guidance recommends that local authorities should carry out a detailed urban design study when assigning appropriate and inappropriate areas for tall buildings. The urban design study should identify those elements that create local character, such as streetscape, scale, height, urban grain, natural topography as well as landmark buildings and significant views.<sup>9</sup>

**1.7** In line with the London Plan and English Heritage and CABE’s joint guidance this analysis identifies sensitive or inappropriate areas for tall buildings based on a detailed urban design and character study. This has been done through a sieve analysis designed to protect sensitive buildings, areas and views. It is a methodology widely used in a number of similar studies across London and the UK.<sup>10</sup>



**1.8** This document presents the following:

- built character of the Royal Borough
- building height and typologies in the Royal Borough
- sieve tests
- Proactive tests and tall building arguments
- conclusion

**1.9** Other pertinent information, including the national, regional and local policy context, design evaluation criteria and detailed submissions for tall building proposals, are contained in the appendices. They are material to planning consent decisions.

However, the analysis does not indicate where tall buildings are appropriate. This would require a comprehensive review, which because of the finely grained nature of the Borough's urban form, would be a disproportionate use of council resources to produce. In addition, a proactive assessment of how tall buildings could enhance the Borough image is set out. Based on the analysis, this document provides guidance on how proposals for tall buildings will be determined in accordance with current planning policy. It is not enough that tall building proposals are outside inappropriate or sensitive areas. All tall building proposals must also satisfy the proactive assessment.





## 2 BUILT CHARACTER IN THE ROYAL BOROUGH

### Urban form

**2.1** The Royal Borough of Kensington and Chelsea is characterised by a finely grained historic street pattern with an outstanding building stock of Georgian and Victorian town houses, and Edwardian mansion blocks. The urban form becomes more diverse and fragmented for the most part along the main transit corridors and barriers – the Westway and the Grand Union Canal/ Paddington Main Line in the north, the West London Line and West Cross Route (A3220) in the west, and the River Thames in the south.

**2.2** The majority of the Borough is residential. The retail sector in the Borough is significantly developed with a number of well-established town centres and high streets, often supported by office uses. Other employment uses tend to cluster alongside the railway lines. The Borough also contains a variety of cultural, educational, leisure, and health and sport facilities.

**2.3** The predominant development form is the urban street block with buildings following the perimeter of the block.<sup>11</sup> This typical arrangement creates a clear distinction between external public and internal communal and private spaces. In many parts of the Borough the urban grain is fine. Quarters consist of medium to small sized urban blocks, whilst blocks themselves are subdivided into finely grained development plots. In contrast, most areas along the western and northern edge of the Borough have a coarse and disjointed urban grain. These places are less permeable and are affected by severance.



**2.4** Throughout large parts of the Borough the scale of development shows little variation. The width of a typical unit ranges between 5 - 7.5m (16 - 24ft) for terraced and town houses, and 12 - 18m (39 - 59ft) for mansion blocks. Depending on building height, these very compact development patterns result in medium to high density areas. This is particularly the case in the central area of the Borough, including parts of Notting Hill, Kensington, South Kensington and north Chelsea.

**2.5** The layout of typical Georgian and Victorian estates is characterised by the deliberate formation of clear, well-defined

and enclosed street spaces. Building lines are usually continuous and follow the street. They may be straight or curved in the form of a crescent, or enclose one of the many garden squares. Terraced houses or mansion blocks establish continuous and unbroken street frontages between street corners, giving a strong sense of enclosure. With a direct relationship to the street, regular and frequent doors and windows with few blind frontages, Georgian and Victorian terraces assist overlooking and passive supervision of the street space. This makes streets feel safer and creates a more attractive environment for pedestrians.

**2.6** Contemporary thought on urban planning recognises the Georgian and Victorian forms as excellent examples of good urban design. The architects and builders of those times not only created urban areas of outstanding beauty, but also established robust and adaptable urban structures, to the extent that these quarters and properties today rank as some of London's most desirable.

### Building heights

**2.7** With the exception of a few clusters of tall buildings along main transit corridors, along barriers (e.g., by railway cuttings) or around central nodes, the majority of the Borough has a relatively homogenous and level roofscape.

**2.8** Building heights are relatively consistent within each quarter. Average heights range from 2-storey to 3-storey terraces in North Kensington and the Lots Road area, to 3-storey to 5-storey Georgian and Victorian terraces and town houses for much of the rest of the Borough, with pockets of up to 8-storey late Victorian, Edwardian and 1930s mansion blocks in and around Kensington High Street, Old Brompton Road, Sloane Avenue and Knightsbridge. Final storeys often provide

attic accommodation lit by dormers and are occasionally double-storey in height.

**2.9** A single building height often prevails, especially within historical residential estates, and only key buildings stand out. Eaves lines are continuous and corners are seldom expressed through greater height. On opposite sides of a street, building heights are commonly of similar height. At streets where the edges of different residential estates meet, the difference in height seldom exceeds more than 2 or 3 storeys. The homogenous height, scale and architectural treatment of adjacent development ensembles ensure that streets appear balanced and coherent.

### Tall buildings and clusters

**2.10** Building plots along major transit corridors have experienced higher pressures for change, and show a greater variation in massing and height. This is especially evident around Notting Hill Gate, along Kensington High Street, Cromwell Road, Brompton Road, King's Road and parts of Sloane Avenue and Warwick Road. The tall building survey indicates that developments along these routes reach heights of between 7 - 9 and 10 - 14 storeys.<sup>12</sup> Many of these buildings are not high enough to provide

landmarks on the skyline, but are tall enough to have a distinct visual impact that often detracts from their surroundings. The Borough also accommodates a limited number of taller buildings of 15 storeys and above that have a dominant effect on their immediate and wider surroundings.

**2.11** With the exception of a few single developments, particularly along King's Road, tall buildings loosely cluster in ten groups: *[See Figure 1 following page]*

- 1** **Kensal New Town and Cheltenham Estates**
- 2** **Lancaster West and Silchester Estates**
- 3** **Notting Hill Gate**
- 4** **Kensington High Street (east)**

- 5** **Kensington High Street (west)**
- 6** **Knightsbridge**
- 7** **Cromwell Road**
- 8** **Sloane Avenue**
- 9** **World's End Estate**
- 10** **Edward Woods Estate**

**2.12** The majority of these clusters occur informally with only the World's End Estate laid out as a formal group. Unlike clusters of tall buildings in central London, none of these clusters signal a significant concentration of commercial activity. Nor do they produce a distinctive or 'signature' skyline. For the most part they are residential high-rise buildings and form part of post-war social housing developments. Others are hotels or offices. Many serve little purpose as way-finding devices and are of poor architectural quality.





- Key
- Boundary of the Royal Borough of Kensington and Chelsea
  - Built form
  - Major green spaces
  - Waterways
  - Rail way line
  - 25+ storeys
  - 15-24 storeys
  - 10-14 storeys
  - 7-9 storeys
  - Other tall structures
  - Other high buildings outside RBKC
  - Cluster of high buildings
  - Protected view corridor to St. Paul's Cathedral

Figure 01  
**Existing high buildings and structures**

**2.13** The Borough accommodates within its boundary two clusters of tall towers in the range of 15 to 24 storeys. The first is formed by the Lancaster West and Silchester Estates<sup>13</sup> (2), which comprise five stand-alone towers located in the vicinity of Latimer Road underground station in North Kensington. The second is the World's End Estate (9) with its seven interlinked towers in southwest Chelsea.<sup>14</sup> In addition, the Edward Woods Estate (10), which is situated east of West Cross Route, is of a similar height. This residential group of four towers is located outside the Royal Borough, but has a strong impact on its skyline.<sup>15</sup>

**2.14** None of these clusters relates to its neighbours in terms of scale, height, pattern and character. They overshadow existing neighbouring buildings and amenity spaces; but also affect the setting of listed buildings and views of historic skyline some distance away: When seen from conservation areas nearby or from the river prospect of Chelsea Embankment, the clusters appear out of place disrupting the urban pattern, scale, roofscape and building line of homogenous Georgian and Victorian residential quarters.

**2.15** Only two buildings in the Borough have more than 25 storeys. The first is the

widely visible residential Trellick Tower by the architect Ernö Goldfinger. This iconic grade II\* listed building on the Cheltenham Estate is 98m (320ft) high and forms a major landmark, dominating the townscape and arguably contributing to the identity of North Kensington.<sup>16</sup> It sits close to the 14-storey Adair and Hazelwood Towers of the adjacent Kensal New Town Estate (1). The second tower is the Kensington Forum Hotel Tower at 84m (275ft) in Cromwell Road close to Gloucester Road underground station.<sup>17</sup> This highly prominent, bulky building appears out of scale and does not relate to its immediate context. It has been identified as an “eyesore” in the Core Strategy.<sup>18</sup> The slightly lower residential development across Cromwell Road, called Point West, seems similarly out of place (7).<sup>19</sup> The Empress State Building is 117m (384ft) high and is a dominant feature on the skyline in the Earl's Court area but is located in the London borough of Hammersmith and Fulham.

### Tall structures

**2.16** There are other tall structures located in or seen from the Borough which may not be thought of as ‘tall buildings’, but which are significantly higher than the surrounding context. These include the gasholders at Kensal, the chimneys of Lots Road Power Station, Earl's Court Exhibition Halls, the



Empress State Building (LB Hammersmith and Fulham) and Chelsea Football Stadium (LB Hammersmith and Fulham).

### Spires and towers

**2.17** A number of other tall structures equally determine the skyline of the Royal Borough. Among these are the spire of St Mary Abbot's Church, the spire-tipped domes of the Brompton Oratory and the Victoria and Albert Museum, and the towers of the Natural History Museum and the Imperial College (City of Westminster).

**2.18** Most of the spires and towers are listed and form important landmarks of local and metropolitan importance. Owing to their slim and tapered profile, they contribute to an attractive skyline without harming their surroundings. Most importantly spires and towers were, and still are significant symbols of religious and civic meaning, and aid overall comprehension of the urban landscape.<sup>20</sup>

### Conclusion

**2.19** The Royal Borough is characterised by the consistency of building heights within its constituent parts and across the Borough as a whole. This is a reflection of its predominantly historic built form and has contributed to creating a highly attractive and distinctive townscape. Few buildings

punctuate the skyline, with tall buildings being the exception rather than the rule. They include important religious and civic buildings, as well as the more prosaic. Many are residential high-rises and cluster in the north and west of the Borough, built as part of the post-war social housing programme.

**2.20** Because of the consistency of building heights in the Borough, tall buildings tend to have a disproportionate effect on its skyline. *There is a strong policy presumption in favour of maintaining this consistency, and the Council will carefully assess the design and townscape qualities of proposals that may otherwise gradually erode this important historic character.*





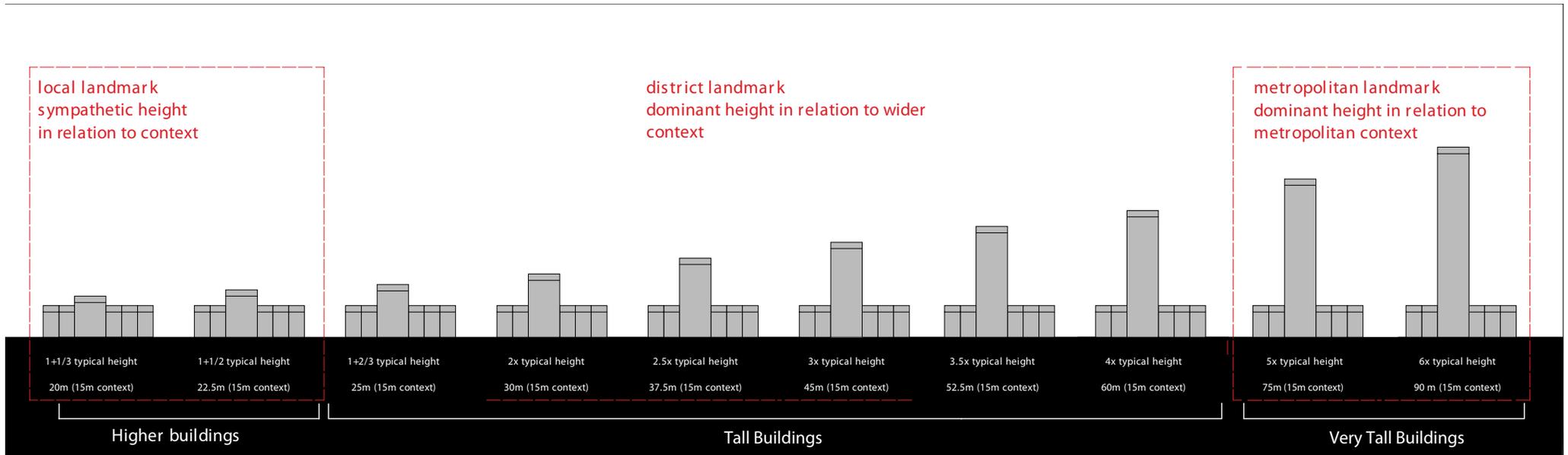


Figure 02  
**Definition of tall buildings as Landmark Structures**

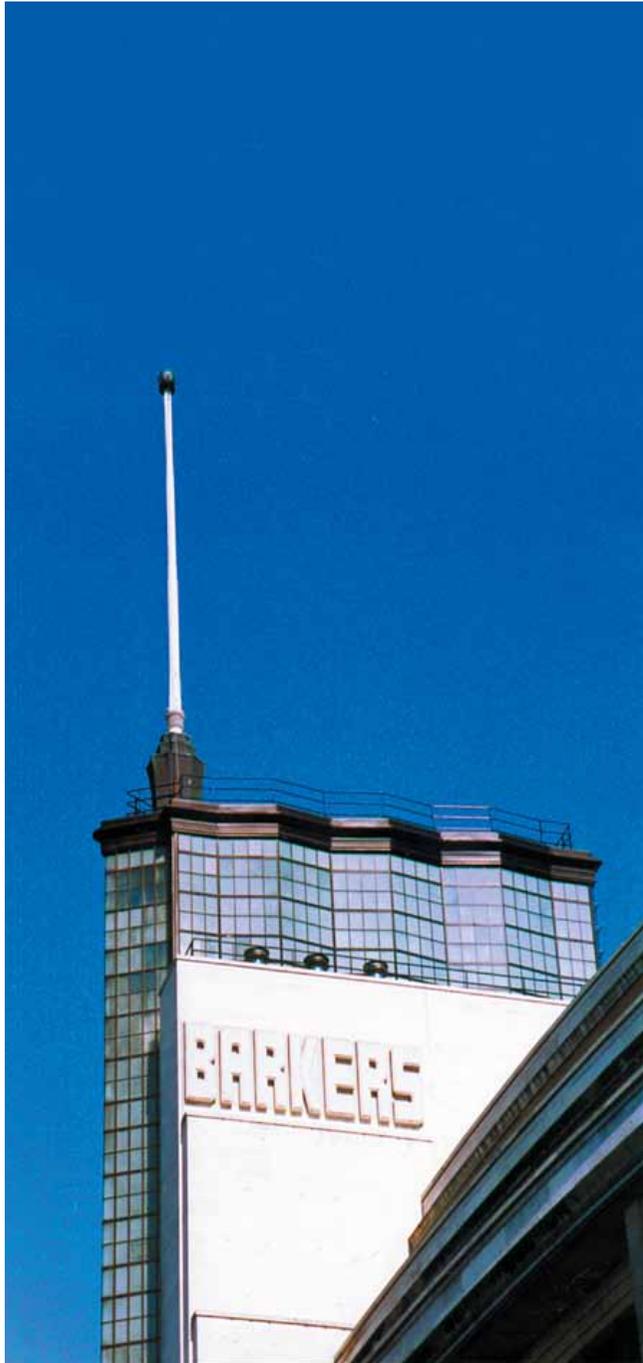
## 3 BUILDING HEIGHT AND TYPOLOGIES

### INTRODUCTION

**3.1** When considering high or tall buildings the Royal Borough distinguishes three categories, referring to how far a building rises above its context and the likely extent of visual impact this has. This is measured on a proportional basis. *[See Figure 2, Page 16]*

- Local landmarks
- District landmarks
- Metropolitan landmarks

**3.2** The three categories are landmarks by virtue of the additional height, forming distinct features in the townscape. That said, landmarks may be distinguished by factors other than height, such as a distinctive form, choice of facing materials or colour, or use: notable examples are the Michelin building in Fulham Road at its junction with Draycott Avenue,<sup>21</sup> Chelsea Town Hall,<sup>22</sup> and the Commonwealth Institute in Kensington High Street,<sup>23</sup> which do not rise above the predominant building height. Nevertheless, height is an obvious landmark device. Only the last two landmark categories of district and metropolitan are regarded as significantly taller than their context and might be referred to as ‘tall buildings’.



## Local landmarks

**3.3** Local landmarks are defined in the Royal Borough as buildings that may be taller than the surroundings, but no taller than 1½ times the typical building height of the context. Although a local landmark stands out, its height-ratio remains integrated into the local context. Its scale, massing and height still relate to that of adjoining buildings and can be read as part of the context. For example, where the surrounding buildings are 15m (50ft), which is typical of the Borough, a local landmark could be up to 22½m (75ft) in height. Local landmarks may be regarded as ‘high’ buildings or in effect buildings that are ‘higher’ than their context, but not so much as to be incompatible with the local scale.

**3.4** Local landmarks often give emphasis to prestigious locations or important uses relevant to those living or working in the area. They are used to express important cross-roads, or terminate local views. Often they highlight activities or services that have localised meaning or significance, aiding local navigation, such as the parish church, meeting hall, local library or town hall. It is not uncommon for corner properties in our Victorian shopping streets to feature an additional storey; or for our public buildings to be of a larger scale and occasionally mid-terrace, providing local

emphasis. Notable examples are Cadogan Hall in Sloane Terrace,<sup>24</sup> St. Columba’s Church in Pont Street,<sup>25</sup> and Empire House in Brompton Road.

**3.5** In each instance the local landmarks may breach the general roofline, but the impact on the skyline is likely to be negligible.<sup>26</sup> Their visual emphasis or ‘legibility’ within the local townscape benefits from and contributes to the Borough’s distinctly traditional urban form. Local landmarks perform local functions, and to do so they should remain compatible with and sensitive to the context. However, their very emphasis is derived from their occasional presence within the local townscape. Careful control is therefore needed to prevent the proliferation of new local landmarks that would otherwise undermine their very purpose and gradually erode the Borough’s consistent building heights. *New local landmarks could be permitted in the Borough where they express important features and aspects of the form and use of buildings, or terminate local views.*<sup>27</sup>

## District landmarks

**3.6** District landmarks are defined as buildings between 1½ times and 4 times the context height. In contrast to local landmarks, they have a dominant effect on

their immediate and wider surroundings. This type of tall building significantly impacts upon the skyline and can act as a strategic landmark, providing important orientation points. Depending on its height and massing, a district landmark may harm its surroundings by overshadowing, overlooking and disrupting the prevailing local building character. Slender tall buildings are easier to absorb within the urban fabric.

**3.7** District landmarks work best when they ‘embody’ a particular public use. According to Spiro Kostof “Urban symbols are presumably carriers of some collective meaning of those who live and work there... Who should have the privilege to represent us on the horizon? These are the fundamental questions.”<sup>28</sup> By Design cites buildings with functions of civic importance as one example where a building could stand out from its background, contributing positively to views and vistas as a landmark building.<sup>29</sup> Tall buildings are a very dominant building form and have a significant impact on the skyline. Notable examples are the Natural History Museum, Brompton Oratory and, more prosaically, the Earl’s Court Exhibition Centre. They may also create an opportunity for magnificent views from top floors, as highlighted in the London Plan.<sup>30</sup>

**3.8** *District landmarks should enhance legibility in the Borough by emphasising civic, cultural or institutional activities of London-wide significance.* London-wide public uses are those of significant public interest, such as a convention centre, major cultural or institutional building, or, in other boroughs, a mainline railway terminus. Opportunities for new public buildings of significant public interest are likely to be very occasional. Where they do arise legibility within the Borough will be an important factor that could justify a new building of district height. If they are to be fully effective and have meaning, however, the new building should accommodate the London-wide function rather than be linked to a wider development that provides the function. Furthermore, an equally distinctive landmark building could just as easily be achieved by focussing on architectural matters other than height, such as form, materials and colour. Privacy, amenity and security remain important considerations.

*District landmarks will require a detailed impact assessment study and masterplan to ensure a wholly positive visual contribution and to avoid harming the amenity of their surroundings.*



### Metropolitan landmarks

**3.9** Metropolitan landmarks are defined as buildings whose height is more than 4 times the typical building height. They are regarded as very tall buildings in the context of the Royal Borough. Buildings of this height, such as Trellick Tower and the Forum Hotel, can be seen from outside the borough and act as significant landmarks on a city-wide scale. They would usually denote the economic centre of a major conurbation, often providing headquarter buildings of major institutes and corporations - for example, Tower 42 and the Gherkin in the City of London and Canary Wharf in the Docklands - and are not associated with predominately residential quarters. Metropolitan landmarks have a stronger impact than district landmarks and are likely to harm their surroundings by overshadowing and overlooking. They are excessively taller than their surroundings and, regardless of their profile, too disruptive to the Borough's traditional urban form and townscape.

*Metropolitan landmarks are inappropriate to the predominantly residential character of the Borough, away from the economic centre of the Capital.*<sup>31</sup>



### TALL BUILDING PREMISE

**3.10** The premise is that Kensington and Chelsea is generally not a tall buildings Borough and as such there are unlikely to be opportunities for new tall buildings. However, *where a tall building may be countenanced it should be of district scale.* This is considered in proportion to the surrounding context and is between 1½ and 4 times the prevailing building scale. Based on a typical building height and street pattern in the Borough this generally equates to 60m (197ft) maximum for a new tall building. Careful assessment of the tall building's location, detailed design and impacts is nonetheless required (see sections 5 and 6). Above this proportional height, *metropolitan scaled proposals will be resisted.*

**3.11** When applying this guidance, building heights will be assessed with reference to structures that are designed for occupation or that can be adapted for occupation, including roof top plant room and lift over-runs. This excludes aerials, finials, screens, spires or devices designed specifically to finish the building and provide its roof profile, and which for the most part are marginal additions to its overall scale.<sup>32</sup>

## 4 SIEVE TESTS FOR TALL BUILDINGS

### INTRODUCTION

**4.1** The visual intrusion of tall buildings is a critical factor in the Royal Borough. Tall buildings can be especially harmful for listed buildings, conservation areas, historic parks and significant views. Tall buildings can affect the setting of listed buildings and views of historic skylines even some distance away. They often appear out of place disrupting the urban pattern, character, scale, roofscape and building line of historic quarters. Sieving examines which specific areas in the Royal Borough are inappropriate for or highly sensitive to the development of tall buildings. These location tests are:

- conservation areas
- buffer zones for sensitive areas
- strategic and local views.

### Conservation areas

**4.2** PPS1 clearly states that a high level of protection should be given to most valued townscapes and landscapes.<sup>33</sup> A large part of the Borough derives its character and townscape from its heritage of eighteenth, nineteenth and early twentieth century buildings and spaces. The Borough contains over 4000 listed buildings and structures, over 100 garden squares and has designated 36 conservation areas, covering over 70% of its entirety. As such it ranks 4th among local authorities in England and Wales for listed buildings and 2nd for the proportion of the Borough with conservation area status.<sup>34</sup>

**4.3** According to national, metropolitan and local planning documents,<sup>35</sup> new developments have to respond to local character and protect and enhance the built heritage. By Design [see **A1.56 page 67**] advises that scale, massing and height of proposed development should be considered in relation to that of adjoining buildings. The guidance also indicates that the character of townscape depends on how individual buildings contribute to a harmonious whole, through relating to the scale of their neighbours and creating a continuous urban form.<sup>36</sup> According to the Core Strategy new development should respect the existing context, its character and appearance, responding positively to matters such as scale, height, bulk, mass, proportion, plot width, building lines, street form, rhythm, roofscape, materials, vistas, views, gaps and historic fabric. Furthermore, English Heritage and CABE's joint guidance indicates that in some historic towns and areas, historic environment considerations may be of such significance that no tall buildings will be appropriate.<sup>37</sup>

**4.4** *Within the Royal Borough's conservation areas historic environment considerations are of such significance that they are regarded as highly sensitive locations for tall buildings, where there is a*

*strong presumption against anything other than occasional local landmarks.*<sup>38</sup> New development within the conservation areas is expected to respond to the character of the surrounding townscape, and as such new development heights generally should not exceed the height of neighbouring buildings.

#### **Buffer zones for highly sensitive areas**

**4.5** English Heritage and CABE's Guidance on Tall Buildings indicates that new developments must conserve, or not damage or detract from:

- listed buildings and their settings, including the foregrounds and backdrops to landmark buildings
- conservation areas and their settings
- historic parks and gardens, landscapes and their settings
- other open spaces, including rivers and waterways, their settings and views from them, and
- other important views, prospects and panoramas.<sup>39</sup>

**4.6** The Royal Borough regards areas near to conservation areas, historic buildings and spaces within Kensington and Chelsea

as highly sensitive to the location of tall buildings. Tall buildings in their vicinity appear out of place, disrupting the urban pattern, scale, roofscape and building line of the homogenous historic townscape and impacting on the skyline and vistas from the Borough's open spaces. The Core Strategy makes it clear that the Borough will resist any development that would adversely affect the setting of a listed building, historic park and garden, or conservation area.<sup>40</sup>

**4.7** In order to protect the character and appearance of conservation areas and their settings, this document defines a 100m (328ft) buffer zone around the conservation areas of the Borough. The size of this buffer zone is based on a typical section through a Victorian street in the Borough, i.e. 5-storey buildings of 15m (49ft) in height and with a 25m (82ft) face-to-face distance. In this case a building of 45m (148ft) height (3 times the typical building height) will be seen and encroach above the roofline in a distance of 75m (246ft), whilst a 60m (197ft) building will be disruptive even up to 100m (328ft) away. *[See Figure 3] Tall buildings within buffer zones are very likely to affect the setting of conservation areas and are considered highly sensitive locations for tall buildings.*

*[See Figure 4]*

**4.8** This buffer zone is a strategic guideline, and is necessary to achieve consistency. Its extent does not respond to the specific nature of each of the Borough's 36 conservation areas. However, it is not arbitrary, but is based on the Borough's typical built form for the purposes of this document. The 100m (328ft) buffer is thus an indicator, and may need fine-tuning in some situations in relation to local context. For example, a tall building seen from a conservation area through focal or axial views could adversely affect the conservation area from distances considerably longer than 100m. *Because of its likely location in a highly sensitive location, a detailed assessment of a tall building proposal is therefore necessary to determine the extent of visual impact.*

It is not cost effective for the Royal Borough to carry out an assessment on a more comprehensive basis, particularly as there

is a strong policy presumption in favour of maintaining a consistent building height. It should be carried out as-and-when a firm proposal is made and as part of a pre-application process.

**4.9** The buffer zone extends in parts across the Borough boundary into the neighbouring planning authorities of the City of Westminster, the London Borough of Hammersmith and Fulham, and the London Borough of Brent. *The Royal Borough may wish to raise an objection to tall building proposals located in buffer zones that fall within neighbouring local authorities.*<sup>41</sup>

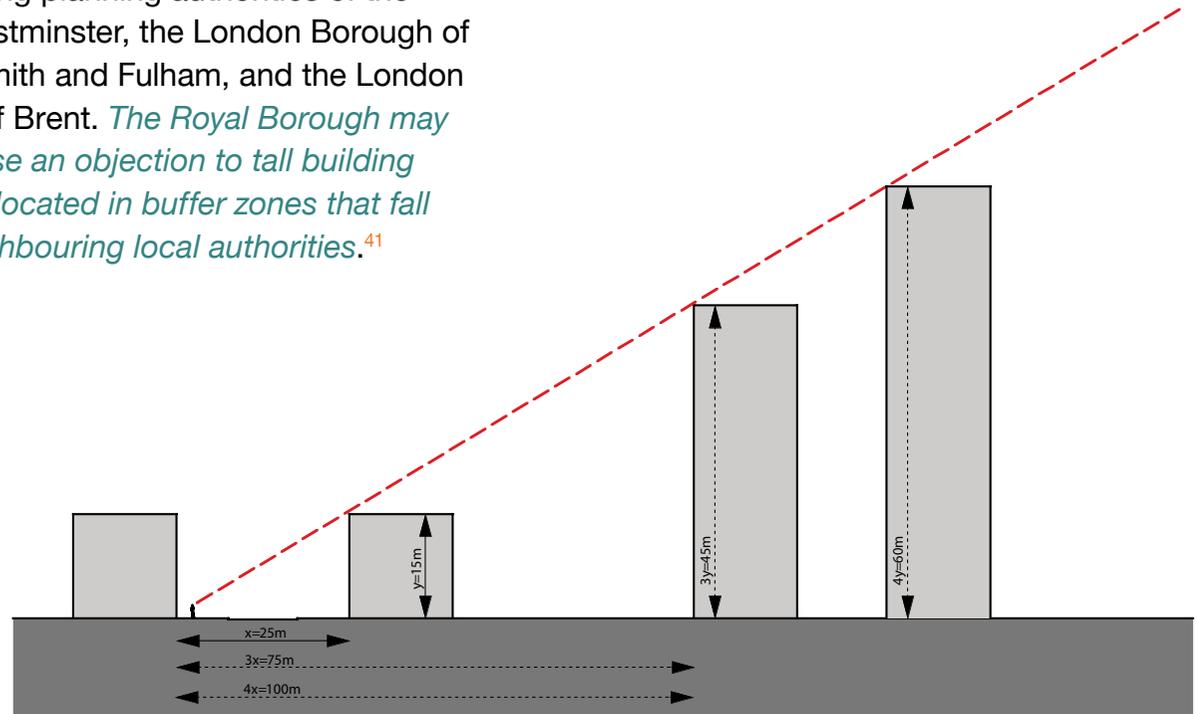


Figure 03

**Schematic section through a typical Victorian/Georgian street in the Royal Borough of Kensington and Chelsea**

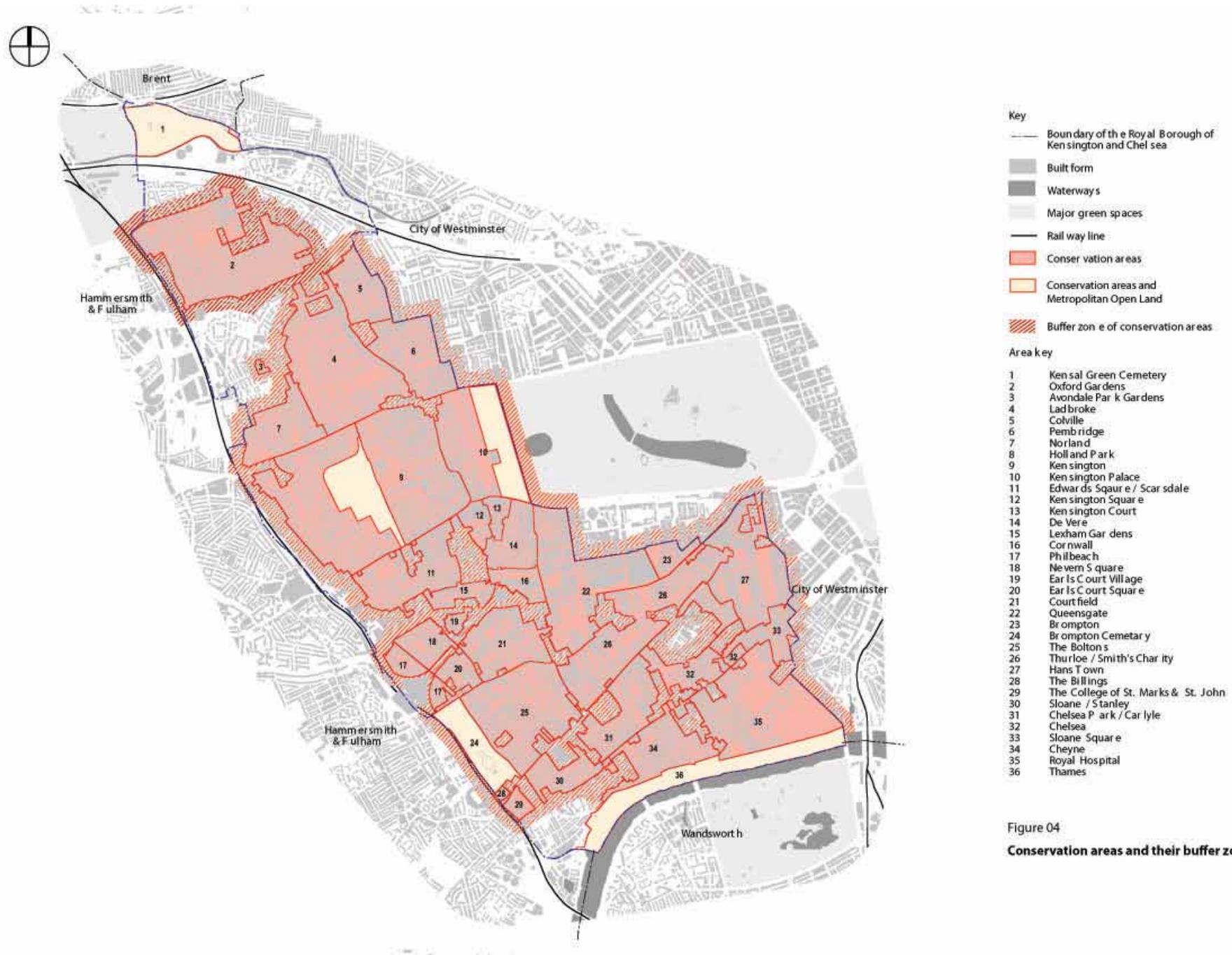


Figure 04  
**Conservation areas and their buffer zones**

## Strategic and local views

**4.10** The London Plan recognises the value of London’s historic built environment and the need to protect its most important and cherished views. In line with the London Plan this document identifies landmark buildings, panoramas, river prospects, townscape views and linear views. In order to preserve the significant views and their settings, this document also defines viewing corridors for townscape and linear views, some of which are already in the Council’s statutory plan and others that have been identified through the analysis for this SPD. Furthermore, it determines backdrops around panoramas and river prospects.

**4.11** In addition, the Royal Borough will consider the effect of development proposals on other views identified in the Council’s Conservation Area Proposals Statements and generally within conservation areas.<sup>42</sup>

They encompass local vistas and views, as well as gaps between developments that are often planned aspects of the townscape and contribute considerably to the visual quality of Kensington and Chelsea. In doing so, the impact of new development will be considered on the foreground, background

and lateral area of the protected view. *Tall buildings should not compromise important views in the Royal Borough. They should not block or dominate a landmark or view, or create an intrusive element in its foreground, middle ground or background.*

**4.12** Based on the designation criteria of the London Plan and the Royal Borough’s Unitary Development Plan the following strategic views, local views and landmarks have been identified in Kensington and Chelsea.<sup>43</sup>

- panoramas and river prospects<sup>44</sup>
- townscape views<sup>45</sup>
- linear views<sup>46</sup>
- views of landmarks<sup>47</sup>

## PANORAMAS AND RIVER PROSPECTS

**4.13** In maintaining the skyline of key panoramas and river prospects it is important to avoid obtrusive tall structures that detract from them. The backdrop to these areas is therefore regarded as sensitive to buildings higher than their context, and, if proposed, care would need to be taken to assess their impact. Backdrops are sensitive in terms of the visual impacts of locating buildings significantly taller than the context.

**4.14** The backdrop is taken as an area 4 times the distance between the relevant viewing point and the distinct building line on the foreground, which determines the view. Again this is based on a typical Victorian street with 5-storey buildings and 25m (82ft) face-to-face distance, where a building of 60m (148ft) in height will be seen 100m (328ft) in the distance. *[See Figures 5 and 6 on following page] Any new tall building within viewing corridors and backdrops (panorama and river prospect) is likely to have a negative impact on the identified view by disrupting its setting and character.*

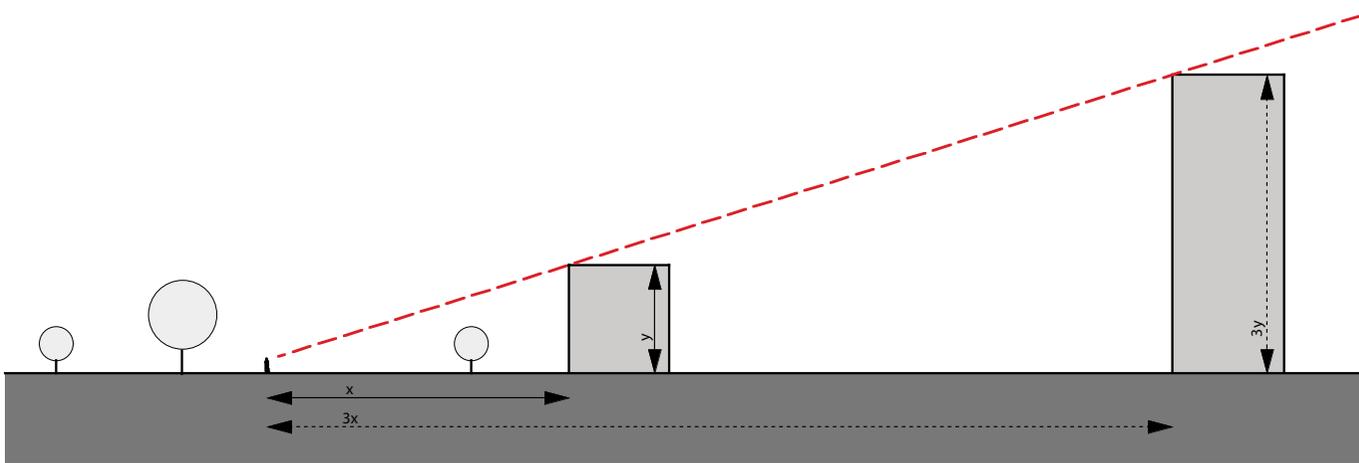


Figure 05

**Backdrop of panoramic views**



- Key
- Boundary of the Royal Borough of Kensington and Chelsea
  - Built form
  - Waterways
  - Major green spaces
  - Building line forming distinct skyline of panoramic views
  - Back drop of panoramic views
  - River prospect
  - Back drop of river prospect
  - Key landmark
  - Potential key landmark
  - Linear view to key landmark
  - Townscape view
  - Panoramic view
  - Protected strategic view

Figure 06  
**Protection of strategic and local views**



### Panoramas

- LP1: Kensington Gardens and Hyde Park<sup>48</sup>
- LP2: Holland Park<sup>49</sup>
- LP3: Royal Hospital<sup>50</sup>
- LP4: Brompton Cemetery<sup>51</sup>
- LP5: Kensal Green Cemetery<sup>52</sup>

### River prospects

- RP1: River views of Chelsea Embankment and the setting of Chelsea Old Church as well as views from the Thames bridges<sup>53</sup>

### Townscape views

- TV1: View of Kensington Palace from the east across the Round Pond<sup>54</sup>
- TV2: View of Chelsea Embankment from Chelsea Bridge (*see RP1 above*)

### Linear views

**4.16** In contrast to panoramas, river prospects and townscape views, linear views are very specific with defined viewing corridors. The Borough has one strategic linear view, defined in the London Plan, from King Henry's Mound to St Paul's Cathedral. There is, however, a range of local views and vistas which it is important to maintain. *[See Figure 6 previous page] Buildings that intrude upon the strategic view and other identified linear views are inappropriate.*

### Strategic view

- LV1: Strategic view of St. Paul's Cathedral from King Henry's Mound<sup>55</sup>

### Views and vistas around Kensington Palace<sup>56</sup>

- LV2: View of Kensington Palace from the east across the Round Pond

### Views and vistas in and around the Royal Hospital<sup>57</sup>

- LV3: View along Chelsea Embankment and from the Embankment northwards towards the Royal Hospital and its ancillary buildings
- LV4: View along Royal Avenue from King's Road to the Royal Hospital
- LV5: Views along St. Leonard's Terrace, Franklins Row, Royal Hospital Road and Ormonde Gate to the Royal Hospital

### Townscape views

**4.15** As with panoramas and river prospects, townscape views must avoid obtrusive and ill-considered buildings above their context. *[See Figure 6 previous page] Townscape views are regarded as highly sensitive in relation to the potential location of buildings significantly taller than the context.*



**Views and vistas in and around the Kensington Museums area,<sup>58</sup> particularly the Natural History and Victoria and Albert Museums, the Colcutt Tower and Brompton Oratory<sup>59</sup>**

- LV6: Views from the west: through Kynance Mews from Launceston Place and from Victoria Road along Victoria Grove.
- LV7: Views from the north: from the axial flight of steps south of the Albert Hall.
- LV8: Views from the south: from Harrington Road up Queensberry Place; up the east side of Onslow Square towards the Natural History Museum; from the front of Melton Court up Cromwell Place to the tower of the Natural History Museum and the Colcutt Tower; and from Pelham Place and Thurloe Square towards the tower of the Victoria and Albert Museum.

- LV9: Views from the east: from Princes Gate Mews; and from Fairholt Street and Cheval Place (partly within Westminster) and views and vistas to Trellick Tower.
- LV10: View of Trellick Tower from the Grand Union Canal
- LV11: View of Trellick Tower from Golborne Road with St. Lawrence (Portobello Road)

**Views of landmarks**

**4.17** Within the Borough there are a number of buildings that act as landmarks within the townscape. *[See Figure 6] Views of landmarks are regarded as highly sensitive in relation to proposals of any height, but in particular in relation to buildings significantly taller than their context.*

- L1: Trellick Tower *grade II\**
- L2: Kensington Palace *grade I*
- L3: Kensington Town Hall
- L4: Albert Hall (in Westminster) *grade II\**
- L5: The Colcutt Tower *grade II\**
- L6: Natural History Museum *grade I*
- L7: Victoria and Albert Museum *grade I*
- L8: Brompton Oratory *grade II\**
- L9: The Royal Hospital *grade I*
- L10: Earl's Court
- L11: Harrod's *grade II*
- L12: Lots Road Power Station
- L13: Barker's, Kensington *grade II*
- L14: St Mary Abbots, Kensington *grade II\**
- L15: The Commonwealth Institute *grade II\**

**4.18** The list of landmarks and local views is not exhaustive. Many, but not all, are identified within Conservation Area Proposal Statements.<sup>60</sup> The Borough intends to prepare a Supplementary Planning Document on protected views as part of its Local Development Framework. The SPD will provide a more comprehensive study of view points, approaches and important visual experiences for protection in Kensington and Chelsea. To begin with however, a

Views Methodology SPD will be prepared. This document will set out the process for identifying, grading and protecting views in the Royal Borough, and provide the basis for the more comprehensive study.

#### Mapped Outcome

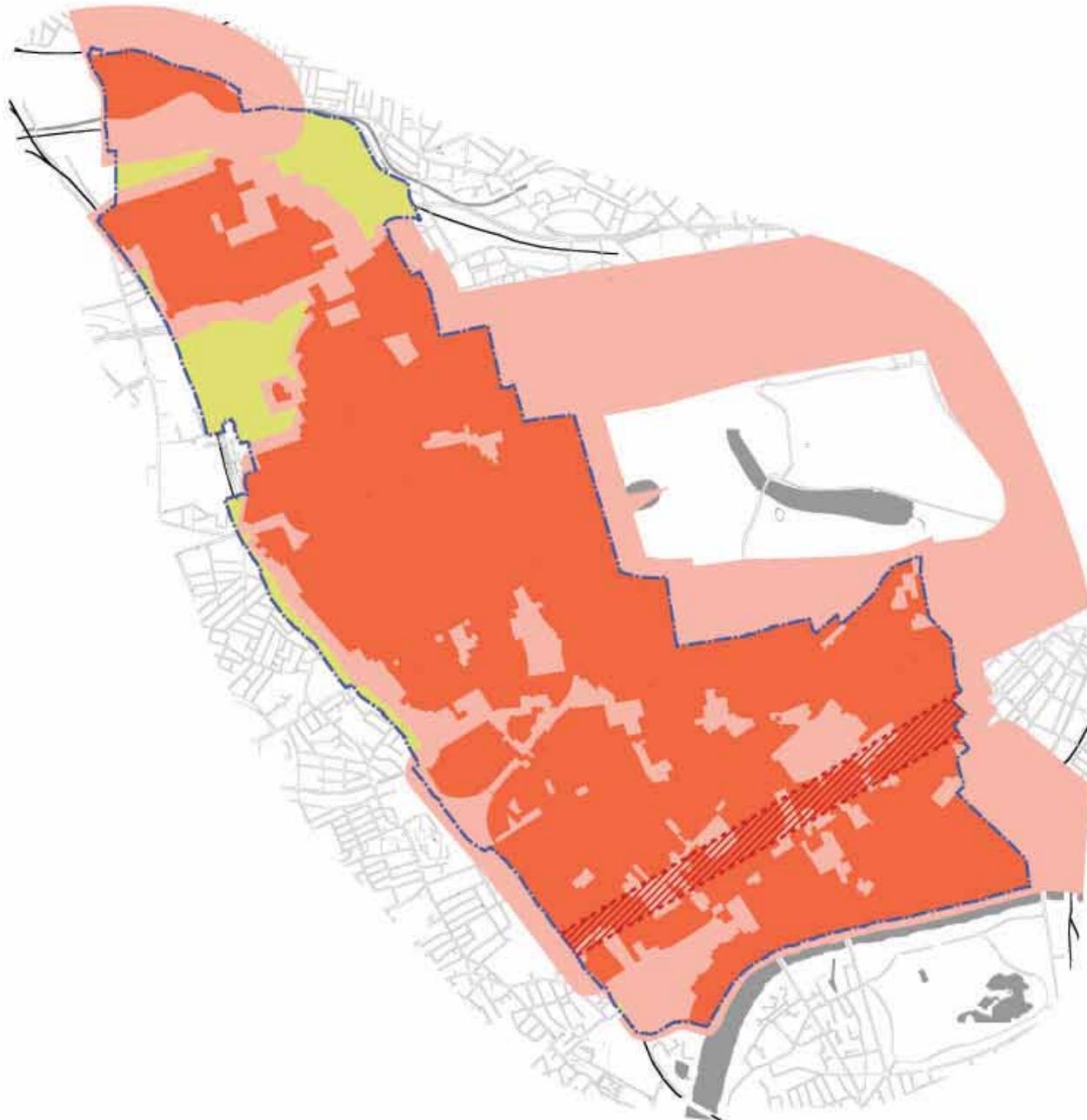
**4.19** The sieve analysis indicates those parts of the Borough regarded as inappropriate for and highly sensitive to the development of a new tall building. Within

these areas a tall building proposal is likely to be visually intrusive and may well be disruptive, compromising the character, appearance or setting of a heritage asset or important view. Each case, however, must be judged on its planning merits.

**4.20** Outside of these areas may be regarded as generally visually recessive, where the visual intrusion of a tall building proposal may be less sensitive to visual disruption. *[See Figure 7, following page]* By reason of its strategic level, however, neither the exact boundaries are identified, nor is the appropriate height of a tall building established. Therefore, *all tall building proposals will require a detailed design study that includes the submission of a Zone of Visual Influence (ZVI) and a full visual impact assessment. This should demonstrate that the tall building has a wholly positive impact upon on the quality and character of the Borough's townscape.* But avoiding causing harm is an insufficient argument to justify any development, let alone one with impacts as significant as a tall building. All tall building proposals, therefore, must satisfy the positive tests for tall buildings.







Key

-  Boundary of the Royal Borough of Kensington and Chelsea
-  Built form
-  Waterways
-  Major green spaces
-  Conservation Areas (highly sensitive for tall buildings)
-  Protected metropolitan view corridor (inappropriate for tall buildings)
-  Buffer zones of Conservation areas, backdrop of London panoramas, river prospect and view corridors (highly sensitive for tall buildings)
-  Non sensitive

Figure 7

**Inappropriate and highly sensitive areas for tall buildings**

## 5 PROACTIVE TESTS FOR TALL BUILDINGS

### INTRODUCTION

**5.1** In the recent past development economics were the overriding consideration when it came to the siting of tall buildings. The outcome has been buildings that at best do not fit comfortably within the townscape and which at worst present a major disruption to the character of the surrounding area. Today, policy at all levels demands that the arguments for where tall buildings can be located should be much more carefully and comprehensively considered.

**5.2** This section sets out positive arguments or ‘tests’ for tall buildings that are supported by the Council. It goes on to discuss other reasons commonly used to support proposals for tall buildings, but which may not be considered sufficient justification within the Royal Borough. It is not enough that tall building proposals are outside inappropriate or sensitive areas, or that they present negligible visual disruptions. All tall building proposals are also expected to satisfy the proactive assessment.

#### Positive tests

**5.3** There are three positive tests that support the case for locating tall buildings within the Royal Borough and need to be taken into account when reaching a final decision.

- design quality
- townscape legibility
- London-wide public uses.

## Design quality of tall buildings

**5.4** Tall buildings can offer an exciting alternative to the more traditional development form, but more than any other typology they require design excellence to maximise their contribution to the skyline and local environment and mitigate their negative impacts, particularly at street level.

*Tall buildings should be of an exceptional architectural, sustainable and urban design quality.*<sup>61</sup>

**5.5** In the right place, tall buildings and structures can contribute positively to the character of the Royal Borough, its townscape and skyline, creating distinguished landmarks. To do so, however, they must possess an architecture that is convincing and highly attractive, especially when viewed in the round. This requires the skilful handling of scale, form, massing, aspect ratio<sup>62</sup>, proportion, silhouette and crown, and the careful selection of facing and glazing materials. Graceful and slender designs are far more likely to be successful than bulky designs. Slender buildings often achieve an aspect ratio of 5:1 or more. This applies both to tall structures designed as stand-alone buildings and to those integrated within the street block where a slender element rises above the building shoulder (e.g., podium and tower). Building services

and telecommunication equipment should be integral to the design. The provision of a high-level gallery or activity from which the public can enjoy the view from tall buildings is welcome.

**5.6** Tall buildings are likely to have a greater impact on their environment than other building types. Due to their massing and height, tall buildings usually overshadow and overlook their immediate surroundings. This is especially harmful for residential environments and amenity spaces. Furthermore, tall buildings can have negative effects on the microclimate, causing air turbulence and diversion of winds to ground level, glare and noise reflection. Detrimental impacts on amenity and the environment should be prevented through careful siting and building orientation; sensitive architectural form, in terms of height, massing, set-backs and floorplate design; and clever façade treatment, for example, using architectural devices or materials that baffle microclimatic effects, such as awnings, skirts and terraces. Any night-time lighting should avoid causing light pollution, and be well designed and appropriate to the building and its setting.



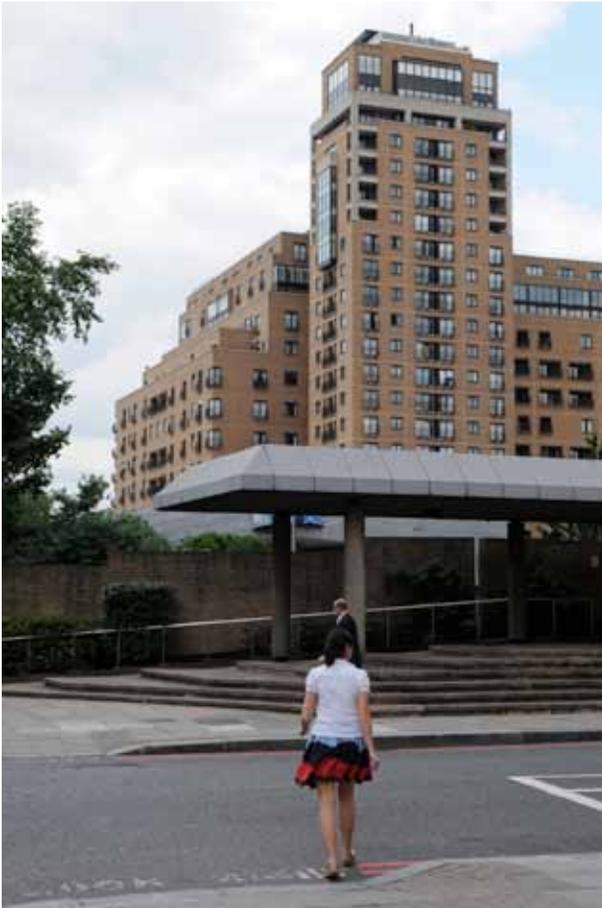
**5.7** Design quality applies equally to the top of tall buildings, where the impact is on the skyline, as to their base. At the lower levels it is not only the impact on the streetscape and local views that can be significant, but also how the building functionally relates to the street. Tall buildings may disrupt the continuity of public spaces within an area. Public spaces around tall buildings are often weakly defined and lack enclosure, legibility and passive supervision. Such ambiguous spaces make it difficult to orientate and personal security fears deter non-residents from passing through high-rise estates.

**5.8** The quality of urban design is therefore an essential component of any tall building design. It should ensure the successful physical and visual integration of a tall building into its surroundings, fostering positive relationships with neighbouring buildings and open spaces. This includes promoting connectivity and permeability; defining edges that reinforce existing building lines and give a coherent form to open space; and responding positively to valid opportunities to define and landmark points of significant urban activity and civic importance (*see below*).

**5.9** Tall buildings that integrate with the street block and avoid creating an object on their own are more likely to be successful, making for a meaningful public realm. A tall building should orientate its front and main entrance to the street or public square. The ground level should be highly accessible and improve the quality of the pedestrian environment. It should provide for active ground floor frontages and a stimulating and inclusive public realm. The façade should be transparent with sufficient openings to assist overlooking and passive supervision of the public realm. Blank walls should be avoided. This makes the street or square feel safer and creates more attractive environments for pedestrians. The public realm itself should be enhanced through high quality landscape treatment.

**5.10** Tall buildings should be designed to contribute to the quality of life of those using the building in terms of function, fitness for purpose, access, safety and amenity. Good design implies good economics; tall buildings should be durable, as well as having a design that incorporates flexibility and can be adapted over time to suit new living standards or working practices, or changes of use.





Well-used, popular tall buildings are more likely to be better maintained, optimising their contribution to the Borough's building stock and townscape appearance.

**5.11** As significant investments of material and energy resources, tall buildings represent significant opportunities for exploring and utilising sustainable design and construction practices; and as such they should set exemplary standards. This includes minimising energy use and reducing carbon emissions, using the latest building technologies and resource management. Sustainability should be delivered through sensitive building configuration and orientation; careful consideration of energy sources and conservation, material source and lifecycle; the design of internal temperature control and use of natural ventilation; water use and conservation, and mitigation of water run-off; waste management; and on-site ecology. The highest rating of sustainability should be achieved (e.g., 'excellent' BREEAM or EcoHomes rating, or recognised equivalent).

**5.12** Tall buildings are expensive and complex to build. Therefore it is important that the design excellence does not become diluted during the process of procurement, detailed design and construction. Quality

must be assured if the scheme is to be successful and the new building is not to disappoint. The Council has to be satisfied of the credibility of the design, both technically and financially. Tall building promoters will need to demonstrate their capability and commitment to carry through the vision and design qualities set out in their proposals. <sup>63</sup>

### Townscape legibility

**5.13** According to the London Plan the Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London's character and where they are also acceptable in terms of design and impact on their surroundings.<sup>64</sup> Furthermore, By Design advises that a building should only stand out from the background of buildings if it contributes positively to views and vistas as a landmark.<sup>65</sup> Landmarks are by definition easy to see and recognise. They provide geographical and cultural orientation points, and act as carriers of meaning. Tall buildings and structures are obvious landmark features. Depending on their size and location tall buildings can perform as local, district or metropolitan landmarks.

**5.14** The Royal Borough has a tradition of local landmarks that articulate the local townscape, highlighting important squares,

streets, street geometries and functions that have significance to those living and working in the area. Taken together they build up into a greater level of legibility across a broader area. There may be opportunities to extend this legibility through additional urban markers within the local townscape. Therefore, new local landmarks may be used to express important junctions and highlight activities or services of localised meaning and importance.

**5.15** *District landmarks should articulate positively a point of townscape legibility of significance for the wider Borough and neighbouring boroughs, such as deliberately framed views and specific vistas.* They may serve to close or fix the vista, frame the view or provide a counterpoint in a deliberately framed view, in the Classical town planning tradition. It is important that vistas are not misinterpreted to be any straight street. Given the built character of the Borough and the lack of availability of very large sites, the opportunities for developing new tall buildings within a strong directional alignment that offer a point of visual significance will inevitably be limited. Where this can be achieved, the aesthetic aspect of the proposed tall building cannot usually be separated from its functional role (see below).

## London-Wide Public Function

**5.16** Tall buildings are one model for landmarking significant public uses. The Royal Borough is home to several major public institutions and uses of London-wide or national importance that are located in landmark buildings of local or district scale. They include the Natural History Museum, Victoria and Albert Museum, Brompton Oratory and the Earl's Court Exhibition Centre. *New public functions of similar standing and public significance may warrant a proposal for a tall building within the Borough.*

**5.17** Opportunities for new buildings of significant public interest are likely to be very occasional. Where they do arise, legibility within the Borough will be an important factor that could justify a new building of district height. If they are to be fully effective and have meaning, however, generally the building should accommodate the pan-London function, rather than be linked to a wider development that provides the function.

## OTHER ARGUMENTS

**5.18** There are a number of other arguments often presented in support of tall building proposals, but which on further analysis are unlikely to be relevant to the



Royal Borough. This section summarises the arguments and sets out why they may not apply.<sup>66</sup> They are:

- World City
- Economic Clusters
- Regeneration
- Opportunity Areas
- Density / Accessibility
- City Legibility

### ‘World City’ thesis

**5.19** London is one of the world’s major business, political and cultural centres. It has a considerable influence worldwide and is regarded as one of the world’s major global cities. London accommodates international financial institutions, law firms, corporate headquarters (especially conglomerates) and stock exchanges that have influence over the world economy. It has been argued that world cities have to represent their status through clusters of tall buildings, which dominate the skyline. Proponents furthermore argue that in order to maintain their leading role global cities need to provide sufficient sites for the development of tall buildings.

**5.20** Global companies invest in their corporate image; head offices are usually bespoke buildings of high quality with well-known addresses. Many companies tend to prefer tall buildings, since they have a strong presence and a greater impact than lower buildings when seen from medium and long distances. It has been argued that there is a risk that global companies would relocate outside the U.K., if not enough tall building opportunities are provided in London.

**5.21** Nevertheless, there is no overwhelming evidence that global cities need to be characterised by tall buildings or that global companies will locate outside the UK if opportunities for tall buildings are not provided.<sup>67</sup> Should there effectively be a future need for tall ‘global’ buildings, they would be best located in the City of London and Canary Wharf, which already serve to attract advanced producer services. Indeed it is argued that the Royal Borough makes an invaluable contribution to London’s World City status precisely because of the exceptional quality of its remarkable historic townscape and large numbers of historic buildings. The Royal Borough has no global economic clusters and is not suitable to accommodate new global economic clusters, which might or might not require tall buildings.

### Economic Clusters of Related Activities / CBD

**5.22** The London Plan highlights that the Mayor will promote the development of tall buildings where they help to provide a coherent location for economic clusters of related activities.<sup>68</sup> The City of London, Isle of Dogs and Croydon are obvious economic clusters and are identified as appropriate locations for tall buildings by the Mayor.<sup>69</sup>

**5.23** *The Royal Borough of Kensington and Chelsea has no major clusters of commercial or economic activity*, with only some pockets of office use, hotels and retail activity located around public transport nodes and along key corridors. These clusters of business activities are insufficient in size or concentration to merit the location of new tall buildings. Current estimates are that Kensington and Chelsea may see some 23,000 sqm of new offices and 31,000 sqm of new retail during the lifetime of the Core Strategy.<sup>70</sup> Hotel accommodation will improve in quality but is unlikely to grow substantially. These figures are totals for the Borough and by themselves are unlikely to generate high building activity, especially as retail rarely works above first floor level. *The Royal Borough is not identified as appropriate for tall buildings to mark clusters of economic or commercial activity.*

## The Regeneration argument

**5.24** Tall buildings when incorporated into major developments are thought to alter the perception of an area in terms of land values and long-term investment potential. In this way they may act as a catalyst for regeneration, particularly when used to subsidise transport and social infrastructure improvements. The London Plan reflects this line of thinking. It promotes the development of tall buildings where they act as a catalyst for regeneration.<sup>71</sup>

**5.25** Regeneration is about bringing development and economic activities to an area through increasing its profile and concentrating activity. Regeneration is generally achieved through higher densities and more mixed and intensive uses. It has been argued that regeneration areas should be represented through tall buildings as they represent a sure way of increasing an areas profile by making a significant physical change. Nevertheless, there is no evidence that high-rise buildings act as a catalyst for regeneration.<sup>72</sup> In the Royal Borough confidence in regeneration is signalled through quality urban design and public realm improvement rather than tall buildings. *In Kensington and Chelsea tall buildings are not required for regeneration, as it can be achieved through medium rise, high-density development in the traditional urban form, preserving the distinctive character and*

*appearance of the Royal Borough.* Warwick Road and Wornington Green are examples in the Royal Borough where this is taking place.<sup>73</sup>

## Opportunity Areas

**5.26** Tall buildings have become synonymous with the development of Opportunity Areas within London. Opportunity Areas are generally major brownfield sites regarded as capable of accommodating substantial growth in new jobs and homes in the Capital. The London Plan seeks to maximise the potential contribution of Opportunity Areas through significant densification. Typically each area can accommodate at least 5000 new jobs or 2500 new homes or a combination of the two, together with the provision of supporting infrastructure.<sup>74</sup>

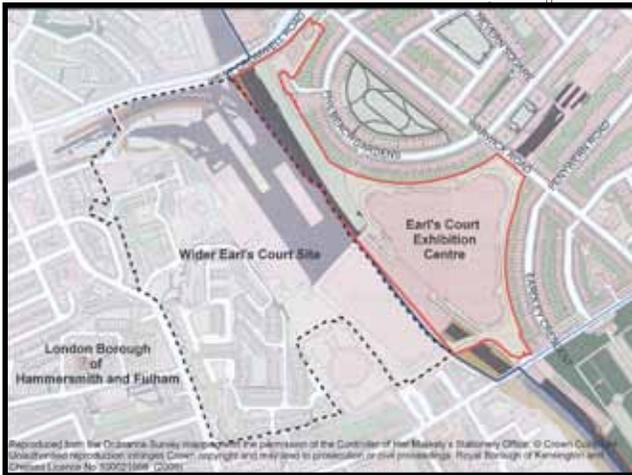
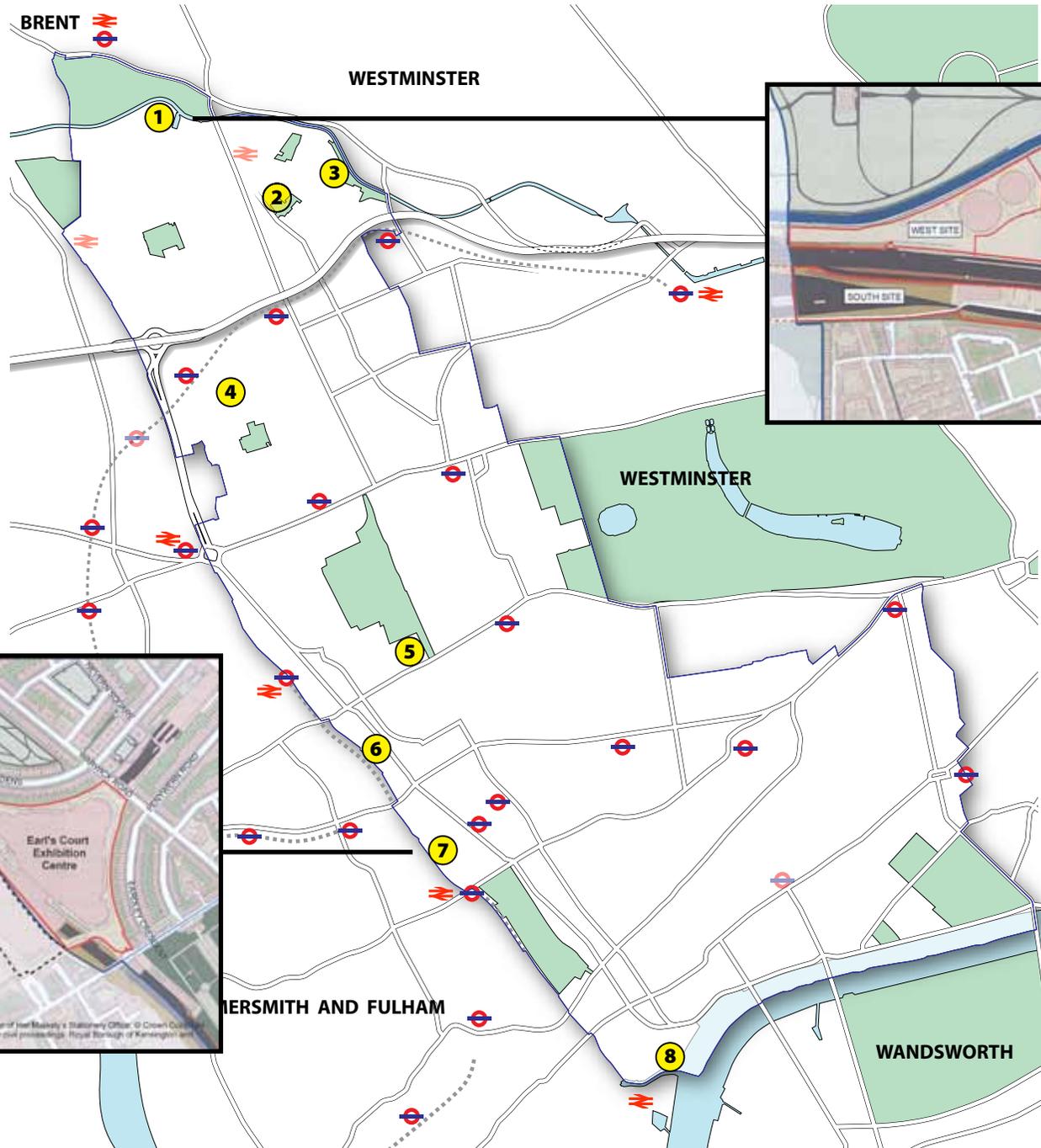


**5.27** The strategic focus of the London Plan is on the location and overall intensity of growth of the Opportunity Areas, and generally not on the types of built form. However, reference is made within the plan to some Opportunity Areas being identified as suitable locations for tall buildings. It is argued that ‘tall buildings can be a very efficient way of using land...They can support the strategy of creating the highest levels of activity at locations with the greatest transport capacity’.<sup>75</sup>

**5.28** The adopted London Plan identifies 28 Opportunity Areas, mostly concentrated within inner London boroughs and to the north and east, in areas of good public transport or where public transport improvements would readily support their development. There are *no Opportunity Areas currently located within the Royal Borough of Kensington and Chelsea*. The nearest designated sites are Paddington, Victoria and White City. Of these, White City should relate to the intensification of development at Shepherd’s Bush and not to locations within the Royal Borough.

# STRATEGIC SITES

- 1 Kensal
- 2 Wornington Green
- 3 Land adjacent to Trellick Tower
- 4 North Kensington Sports Centre



- 5 Commonwealth Institute
- 6 Warwick Road (5 sites)
- 7 Earl's Court
- 8 Lots Road Power Station

Figure 08  
Strategic Sites

**5.29** The draft replacement London Plan proposes 5 additional Opportunity Areas in the capital. Working in partnership with the Council, the GLA has identified parts of Earl's Court and West Kensington<sup>76</sup> in the west and Kensal Gasworks in the northwest of the Borough as new Opportunity Areas.<sup>77</sup> The GLA continues to regard tall buildings as part of a strategic approach to the regeneration of opportunity Areas, but points out that they can also have a significant detrimental impact on local character. As such 'they should be resisted in areas that are particularly sensitive to impacts and only can be considered if they are the most appropriate way to achieve optimum density in highly accessible locations or to ensure the best local design outcome....'<sup>78</sup>

**5.30** The Core Strategy has responded by identifying the Earl's Court and Kensal Gasworks sites as two of 8 strategically important sites within the Royal Borough where great change is envisaged, and by referring to their status as emerging Opportunity Areas [See Figure 8]. Work has commenced with stakeholders to prepare planning frameworks for the areas, which will identify opportunities and constraints, and realistic programmes and timetables for delivery. This work includes examining

in close detail the appropriate quantum of development and the location and specific height of buildings, and the likely visual harm.

**5.31** Tall buildings may be appropriate within those parts of the Earl's Court/ West Kensington Opportunity Area that fall within the London Borough of Hammersmith and Fulham. This is in accordance with their Core Strategy Options (June 2009). However, they are not being promoted on those parts within the Royal Borough, which are mostly considered sensitive to the visual impact of high buildings, being in close proximity to conservation areas that are characterised by their homogeneity and level roofscape and to Brompton Cemetery which is designated as a conservation area and Metropolitan Open Land. The Council considers a medium-rise, street-based approach could nonetheless achieve the intensity of development required and would be the best local design outcome, seamlessly integrating this part of the scheme into the surrounding, highly-regarded Earl's Court area.

**5.32** The potential for tall buildings within the Kensal Opportunity Area is highly constrained by the site's location adjacent to the Kensal Green cemetery and the Grand Union Canal. The cemetery is designated

a conservation area and Metropolitan Open Land, and contains a number of listed buildings and monuments. The canal is designated a site of Metropolitan Importance for Nature Conservation.<sup>79</sup> Tall buildings are likely to have adverse effects, visually disrupting views out of the conservation area, the setting of the canal and listed structures, as well as overshadowing the waterway and green open space. Investigations have shown that the considerable densities can be achieved without recourse to tall buildings.<sup>80</sup> A medium-rise, high-density built form would be consistent with the wider urban context and complement the Royal Borough's local distinctiveness, whilst still achieving the development quanta envisaged as being provided by Opportunity Areas in the London Plan.

## THE DENSITY / ACCESSIBILITY ARGUMENT

**5.33** With increasing energy awareness and a requirement for sustainable development, densities in urban areas should relate to their accessibility by public transport. PPG13 states that local authorities should promote high density, mixed use development in and around town centres and near to major transport interchanges.

Likewise, the Kensington and Chelsea Core Strategy underlines that high trip generating development should be located in areas well served by public transport.<sup>81</sup>

**5.34** By Design advises that higher density commercial and mixed-use developments, civic buildings and developments likely to generate large numbers of visitors are best located within close walking distance of public transport interchanges.<sup>82</sup> Areas within walking distance of up to 400m (0.25mile or up to a 10 minute walk) from public transport nodes are highly accessible and can ideally be developed to higher densities. In London, public transport accessibility is measured in PTALs<sup>83</sup> which takes all modes of public transportation into account to create an index of how easy is it to travel to a particular place.

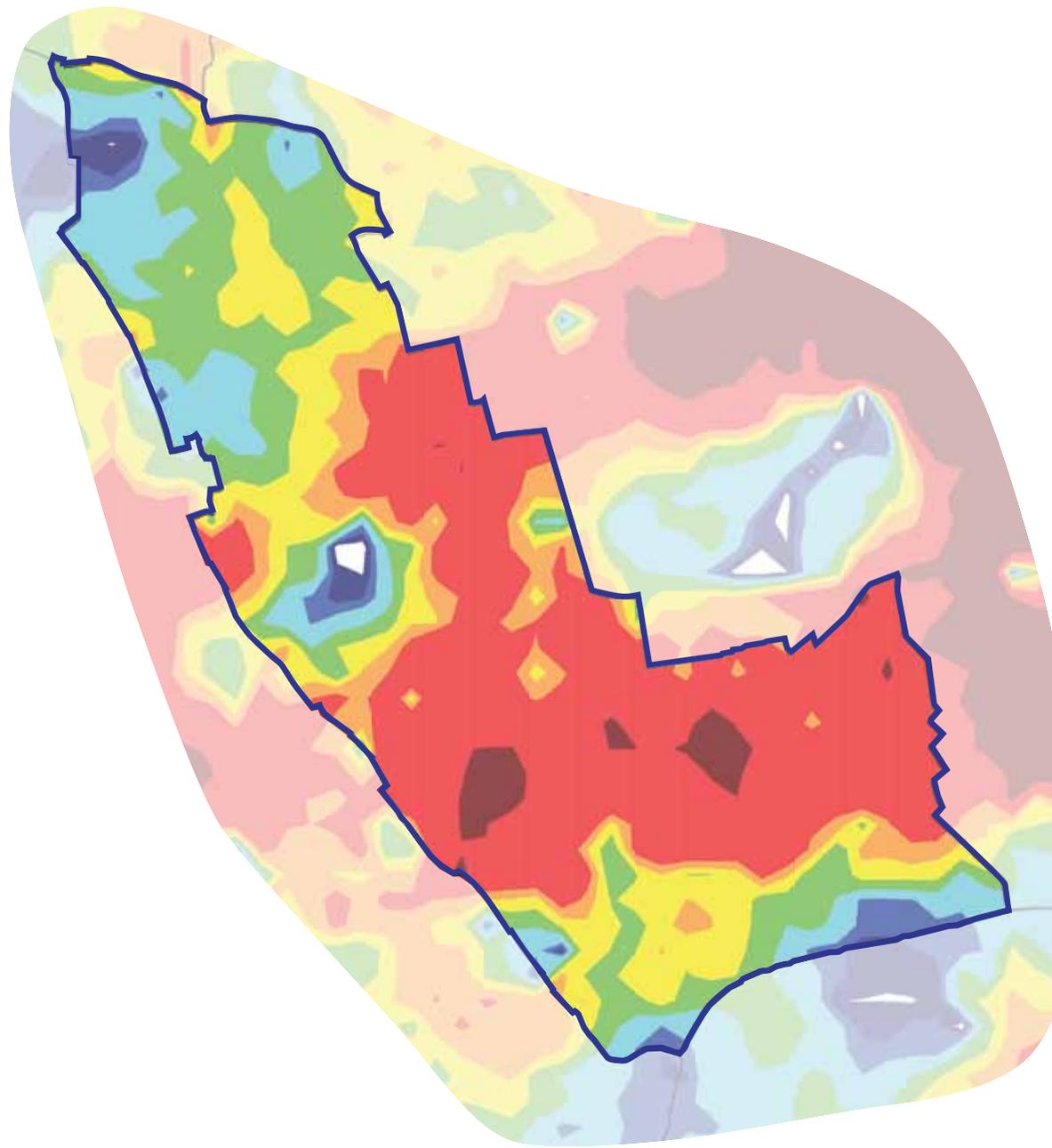
**5.35** The Royal Borough of Kensington and Chelsea is generally well served and accessible by high capacity public transport, with 11 underground stations and 3 surface rail stations. Only North Kensington and South Chelsea are less well served by tube and train. Accessibility of rail public transport is improving in West Chelsea, South Fulham and along the western border of the Borough through the new stops on the West London Line, the OrbiRail and the planned Chelsea/

Hackney Line (Crossrail 2). The Royal Borough is also pursuing a new station within Kensal on the Crossrail line.

**5.36** The current provision of bus services has generally improved accessibility in the Borough, though it is insufficient to make up for the shortfall in access within North Kensington and South Chelsea due to the absence of rail and underground stations. These areas have PTAL scores of between 2 of 3, reflecting poor to moderate public transport access. *[See Figure 9]* High density, high trip generation activities, such as offices and hotels, are resisted in these areas regardless of the development height or form. Much of the Borough, however, has a PTAL score of 4 or above, enjoying good to excellent public transport access. It is here that the pressure for new high-density development is greatest and the case for increasing density levels strongest on sustainability grounds. The capacity of part of the public transport system becomes an important issue that must be addressed.

**5.37** The London Plan asks boroughs to ensure that developments, among other principles, optimise the potential of sites, are sustainable, durable and adaptable.<sup>84</sup> The Plan also highlights that compact city and intensive development does not





**Access to Public Transport  
PTAL**

- 0 Little or no access
- 1a Very poor
- 1b Very poor
- 2 Poor
- 3 Moderate
- 4 Good
- 5 Very Good
- 6a Excellent
- 6b Most Excellent

Figure 09  
**Public Transport Accessibility Levels  
in the Royal Borough**

necessarily imply high-rise buildings and that London has achieved some of its highest residential densities in relatively low-rise areas.<sup>85</sup> Nonetheless it does not discount tall buildings as a viable model of high-density development.

**5.38** Tall buildings, however, are only one possible model for high density. Densities are linked to form and footprint of development as well as building height, and lower-rise typologies such as terraces can achieve as high densities as towers. For most of the Royal Borough, the urban street block lined with terraced housing or mansion buildings is the dominant development form. Victorian terraced housing in the Borough typically provides 700 habitable rooms per hectare

(hrh) in 4 storeys, and Edwardian terraced mansion blocks increasing this to 970 hrh in 6 storeys.<sup>86</sup>

**5.39** Not only has the traditional built form achieved high densities, it has also proven robust and adaptable. Over the past two centuries large parts of Kensington and Chelsea have been able to adapt to changing living and lifestyle requirements and have only seen minimal structural change. Therefore, the Royal Borough already provides a successful model for high density in its traditional Georgian, Victorian and Edwardian building typologies. It is an exemplar of high-density living where the benefits of urban living are achieved whilst avoiding the adverse effects of tall buildings on the local environment.

*In the Royal Borough tall buildings are inappropriate to achieve high density, as it can be achieved through medium rise development in the traditional urban form, preserving the distinctive character and appearance of the Borough.*

**5.40** Where tall buildings are promoted in the Royal Borough in support of the high density levels achievable, it is important to demonstrate that the viability and appropriateness of other lower-rise forms of high-density development



have been explored. This is a matter of design credibility. Evidence of this active consideration of other development forms will be material to the Council's evaluation of the planning applications.

### CITY LEGIBILITY ARGUMENT

**5.41** Tall buildings and structures are obvious landmark features. They can provide important geographical points of reference that most people experience from the outside, aiding their navigation to or through an area. They may mark strategic points, such as locations or buildings of significant public relevance; or they may mark intermediate points, dividing routes into recognisable elements. This section comments on tall buildings used as:

- Gateway landmarks into the Royal Borough
- Progression landmarks along major road corridors
- Landmarks along waterways

### Gateway Landmarks

**5.42** Tall buildings are sometimes used to mark the transition from one 'place' to another, for example, a borough boundary or entry point to a city centre. In the Royal Borough the boundaries to the south, east and north generally coincide with major

physical barriers: the River Thames to the south; the West London Line, itself following the line of culverted Counter's Creek to the west; and the Grand Union Canal and main railway line into Paddington Station to the north. But these boundaries have no real significance of meaning in the wider city landscape, as they are not boundaries of 'place'. They are only local government administrative boundaries. *There is no overriding case for landmark buildings to define administrative districts or local boundaries.*

**5.43** Bridges maintain connectivity with neighbouring areas, some more expressive and memorable than others, offering a sense of arrival or departure contained within the general townscape. Orientation for drivers and pedestrians at these points can be an important consideration, though this is a matter of internal legibility within a localised area and is often accomplished by a range of lower order visual clues, including signing. As with borough boundaries, they do not represent boundaries of 'place'. *The locations do not represent gateways to central London and make no obvious contribution to the image of the city as a whole.*

**5.44** Parts of Knightsbridge and South Kensington, on the other hand, are within the central London's Central Activities Zone. The sense of arrival here is marked by well-known and historic public buildings, monuments and spaces: *The Royal Albert Hall, the Albert Memorial, Hyde Park, Hyde Park Corner and the Wellington Arch support the historic townscape and negate any requirement for gateway landmark tall buildings to central London.*



## Progression Landmarks

**5.45** Tall buildings along major access and transit routes are said to improve the legibility of the city by expressing the hierarchy of the street or marking specific points and dividing the corridor into recognisable segments. In Kensington and Chelsea many of the major road corridors perform a significant shopping function and have a strong presence on a local and metropolitan scale. Nevertheless, the street hierarchy is typically expressed by modest increases in building heights or emphasized through means other than height, such as the design quality of the buildings or public space. Whilst intermediate markers may provide articulation and help give someone the sense of getting somewhere, the frequency of junctions within the Borough's predominantly finely grained urban structure serves this purpose well. Similarly, more modest design signals, such as projecting a building forward or backward in plan relative to the adjacent street frontages, are used to distinguish buildings and mark progress without visually overwhelming the townscape. Therefore there is no merit in lining the main transit routes with tall buildings to give them greater identity. Many of the major road corridors in the Royal Borough are within its conservation areas.

*Tall buildings are an unnecessary and, in all likelihood, unsuitable form of progression landmarking in the Royal Borough.*

## Landmarks along Waterways

**5.46** The London Plan highlights that 'views to and from the waterways are especially significant because the openness of water spaces allows for relatively long-distance views'.<sup>87</sup> Development should recognise the opportunity to provide landmarks of cultural and social significance along the waterways, providing orientation points and pleasing views, but without causing undue harm to the cohesiveness of the water's edge. The Plan recognises, however, that there are a number of adverse effects that tall buildings can have when located adjacent to water spaces,<sup>88</sup> which include overshadowing, wind turbulence and creating a visual canyon.

**5.47** With the exception of seven interlinked towers as part of the World's End estate in southwest Chelsea and the adjacent area of Lots Road, the water's edge of the Royal Borough is designated a conservation area. It is one of the most famous parts of the Borough and contains many attractive buildings and open spaces that are of architectural, cultural and historical importance.

*The townscape is regarded as highly sensitive and the special waterfront character is afforded protection by the Council's statutory plan.<sup>89</sup>*





## 6 CONCLUSION

**6.1** The Royal Borough is predominantly a residential Borough, strongly characterised by an extensive historic environment of high quality, well-mannered and well-proportioned buildings and streets. The wealth of traditional domestic architecture and traditional urban form has created highly attractive and distinctive townscapes that cover almost three-quarters of Kensington and Chelsea, and make for many of the most highly desirable residential addresses in central London. The general consistency of building heights within areas and across the Borough as a whole is a distinctive feature of this historic environment.

**6.2** Comparatively few buildings and structures rise above the prevailing rooflines and punctuate the skyline. They landmark important civic and religious buildings that fit within the Royal Borough's traditional, fine urban grain. Others are mainly high-rise residential towers that cluster in the north and west, and make for a coarser urban grain. Because of the consistency of building heights in the Royal Borough, new tall buildings and structures have a disproportionate effect on its skyline. There is a general presumption in favour of maintaining this consistency, and the Council will carefully assess the design and townscape qualities of proposals that may otherwise gradually erode this important historic character.

**6.3** When considering high building proposals, the Council distinguishes three categories, referring to how far a building rises above its context on a proportional basis. Local landmarks are ‘high’ buildings that are taller than their surroundings, but no taller than 1½ times their context. They define points of townscape interest or public functions that are relevant to those living or working within the immediate areas. District landmarks are visible over wider areas, tending to be up to 4 times their context in height. They are regarded as ‘tall’ buildings and tend to highlight major public functions. Metropolitan buildings are ‘very tall’ buildings that are more than 4 times their context and characterise central metropolitan areas. Kensington and Chelsea is generally not a tall buildings Borough and as such opportunities for new tall buildings are likely to be few and far between. Where they may be countenanced they should be of district scale. Metropolitan scale buildings are inappropriate.

**6.4** Tall buildings in the wrong location can cause significant harm to the local character of an area, as well as disrupt important views and settings. In line with guidance the Royal Borough has identified at a strategic level extensive areas regarded as highly sensitive to tall building proposals. They

comprise conservation areas, buffer zones to conservation areas and listed buildings, and strategic and important local views. Within these areas a tall building proposal is likely to be visually intrusive and may well be disruptive, and therefore resisted, though each case must be judged on its merits. Outside of these areas may be regarded as visually recessive, where the visual intrusion of a tall building proposal may be less sensitive to visual disruption, though this must be confirmed by the submission of a full visual impact assessment. But avoiding causing harm is an insufficient argument to justify any development, let alone one with impacts as significant as a tall building. All tall building proposals, therefore, must satisfy the positive tests for tall buildings.

**6.5** There are 3 positive tests that support the case for tall buildings within the Royal Borough. Tall buildings should be of exceptional architectural, sustainable and urban design quality. They should articulate a point of borough-wide, significant townscape legibility. Closely linked to this they should provide for an activity of London-wide, significant public use. Whilst there are a number of other arguments commonly used in support of tall building proposals, they are not applicable when considering such applications in the Royal Borough.

**6.6** Finally, new tall building proposals will only be considered as full applications. Details of the information required for submission of tall building proposals are contained in the following appendices, which also includes the national, metropolitan and local policy context.



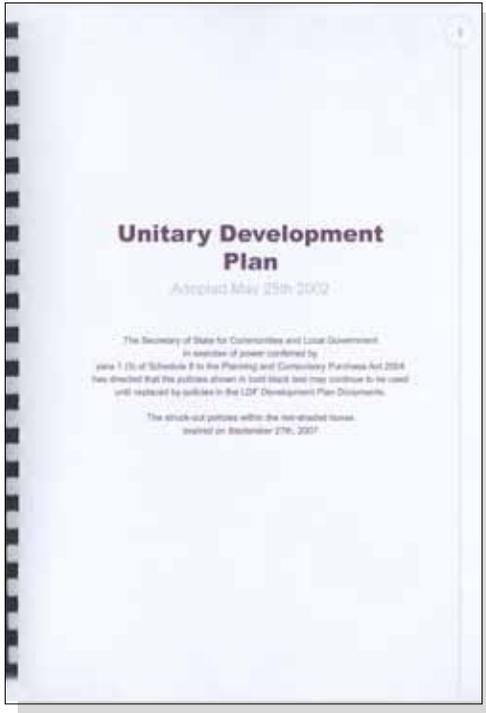
# APPENDIX I

## POLICY CONTEXT

Tall building design has to take into account many components of national and regional planning policy guidance as well as local policies.

### Unitary Development Plan (RBKC, 2002)

**A1.1** The overall aim of the Kensington and Chelsea UDP is ‘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 to work and live’. The UDP gives priority to the protection of the residential character of the Royal Borough (STRAT 1). The borough supports London’s sustainable development through locating high trip generating uses in those parts that are or will be well served by public transport (STRAT 5, STRAT 7).



**A1.2** The UDP does not contain a specific policy on tall buildings. Applications are considered against a panoply of policies that control the architecture, urban design and environmental impacts of all development types, including tall buildings. These policies form the basis for this SPD

**A1.3** The UDP states that all new development has to present a high standard of design (CD27, CD62) and preserve and enhance the residential character of the Borough (STRAT 9). New developments should 'be sensitive to and compatible with the scale, height, bulk, materials and character of the surroundings' (CD27) and 'be physically and visually integrated into its surroundings' (CD28). It should reflect the traditional urban form of the Borough by being designed to emphasize the relative importance of main routes, key locations or other public gathering places (CD28b); and by preserving local plot widths, building lines, roofscape and open space (CD28d). The Borough will resist development, which will significantly overshadow existing adjoining buildings and amenity spaces (CD33) and/or harm the visual privacy of residents (CD35).

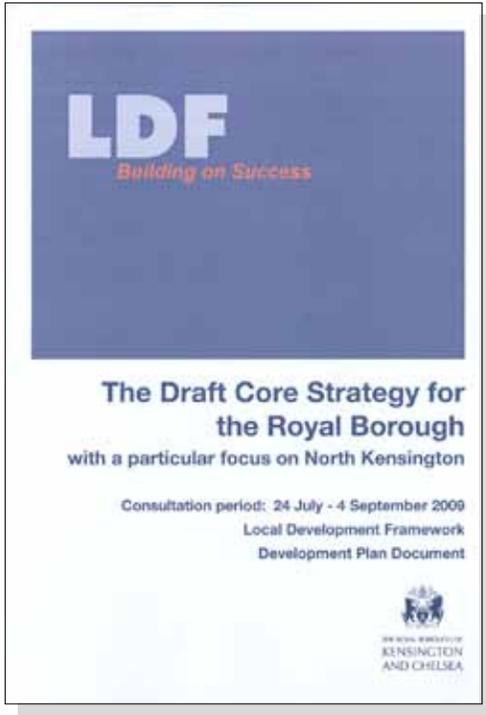
**A1.4** The UDP requires the character or appearance of each conservation area to be protected and enhanced (CD57). Therefore, any development in a conservation area has to preserve the character of the area (CD61) and be compatible with scale and pattern, bulk and height, proportion and rhythm, roofscape, materials, as well as landscaping and boundary treatment of the surrounding (CD62). The Borough makes it clear that it will resist any development, which would adversely affect the setting of a listed building (CD69).

**A1.5** The Borough will protect listed buildings and preserve and enhance the character or appearance of conservation areas, areas of metropolitan importance, areas of local character, and other buildings or places of interest (STRAT 10). The plan seeks to protect the River Thames and its setting and has therefore designated the whole of the Thames within the Borough boundaries as a conservation area.

**A1.6** In line with the London Plan the UDP also protects London's skyline and strategic views, carefully considering the impact of proposals on the foreground, background and lateral area of the protected view (para. 4.3.30, UDP). Therefore, the borough's aim is:

- To protect the strategic view of St. Paul's Cathedral from King Henry's Mound (CD17).
- To protect and enhance views and vistas along the riverside, including river views of Chelsea embankment and the setting of Chelsea Old Church as well as views from the Thames bridges (CD1).<sup>90</sup> Any new development on the riverside should preserve and enhance the waterfront character, improve physical and visual links between the river and the rest of the borough and 'be of a height no greater than the general level of existing building heights to the east of Blantyre Street' (i.e. 5 storeys) (CD6).
- To protect important views and vistas in and around the Royal Hospital (CD8)<sup>91</sup> and to protect the open spaces surrounding the Royal Hospital from inappropriate development, both in the landscaped areas themselves and in the neighbouring streets (CD9).
- To protect important views and vistas in and around the South Kensington Museums area (CD10),<sup>92</sup> particularly to the Natural History and Victoria and Albert Museums, the Colcutt Tower and Brompton Oratory (CD11).
- To require new buildings and extensions to existing buildings in the Royal Borough, which can be seen from Kensington Gardens and Hyde Park, to be designed so as not to exceed the general height of buildings (excluding post war blocks) and to pay regard to the tree lines (CD13). New buildings should not impose themselves on Kensington Palace in the vista's background, particularly when viewed from the east across the Round Pound (CD14).
- To resist proposals that would encroach or adversely affect the setting of Holland Park (CD15) and the Grand Union canal (CD18).





**A1.7** The Borough will furthermore consider the effect of development proposals on views identified in the Council’s Conservation Area Proposals Statements and generally within conservation areas, controlling the visual impact of development on views within, into and out of such areas (CD63).

**Local Development Framework: core strategy submission (RBKC, 2010)**

**A1.8** The Royal Borough is in the process of replacing its Unitary Development Plan and submitted the Core Strategy to the Secretary of State on 19 March 2010 for examination by an independent planning inspector. As an emerging replacement plan the Submission Core Strategy is a material consideration when assessing development proposals, and will increase in importance as it progresses towards adoption.

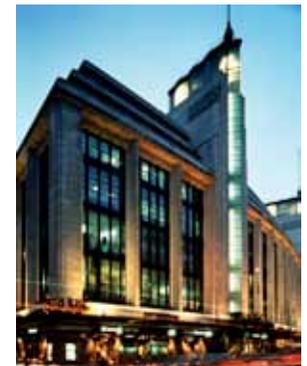
**A1.9** The Core Strategy begins by setting out the overarching vision for Kensington and Chelsea to 2028, Building on Success. It looks to extend the Borough’s strong and varied sense of place by stimulating regeneration in North Kensington, enhancing the reputation of its national and international destinations, and upholding residential quality of life (CV1). The vision is delivered through 7 strategic objectives, which include Renewing the Legacy, where the aim is to

‘pass to the next generation a Borough that is better than today, of the highest quality and inclusive for all.’ This will be achieved by ‘taking great care to maintain, conserve and enhance the glorious built heritage we have inherited and to ensure that where new development takes place it enhances the Borough’ (CO5).

**A1.10** Policy CL2 (New building, extensions and modifications) contains a specific section on high buildings, though the earlier section on architectural design is relevant. Other pertinent policies in the document include policy CL1 (Context and character), CL3-4 (Historic environment and assets), CL5 (Amenity), CR2 (Three-dimensional street form), CR5 (Parks, gardens, open spaces and waterways).

**A1.11** The Council's policy on high buildings, CL2h-I, responds to the relatively modest and consistent building heights within Kensington and Chelsea that reflect the primarily residential character of the Borough, and to its very attractive townscape. There are comparatively few tall buildings, which are regarded very much as the exception to this overriding character and appearance. New proposals are assessed principally on their proportional height, visual impact, architecture and legibility, with only full planning applications being considered. The relevant policy section states that it will:

- resist proposals that exceed the prevailing building height within the context, except where the proposal is for a local or district landmark.
- require proposed local landmarks to:
  - i be of high design quality
  - ii be compatible with the scale, rhythm, mass, bulk and character of the context
  - iii articulate positively a point of townscape legibility of local significance.
- require proposed district landmarks to:
  - i be of exceptional design quality
  - ii be of a slender profile and proportion
  - iii articulate positively a point of townscape legibility of significance for the wider Borough and neighbouring boroughs, such as deliberately framed views and specific vistas
  - iv provide a strategic London-wide public use
  - v require an assessment of the zone of visual influence of a proposed district landmark within or visible from the Borough, to demonstrate that the building has a wholly positive visual impact on the quality and character of the Borough's or neighbouring boroughs' townscape when viewed from the Royal Borough.
- resist a proposal that is of metropolitan scale.
- require full planning application(s) for all buildings that exceed the prevailing height within the context.<sup>93</sup>





**A1.12** The Core Strategy refers to the Council's reputation of upholding high standards of conservation and design, and of constantly seeking improvements to the local environment. It expects development to respect its physical context and to take opportunities to improve the quality and character of buildings and the area and the way it functions. The architecture and urban form should contribute positively to the townscape in terms of scale, height, bulk, mass, proportion, plot width, building lines, street form, rhythm, roofscape, materials, vistas, views, gaps and the historic fabric.

**A1.13** It is made clear that development that has a harmful impact upon strategic and local views will be resisted, and that density is not the sole determinant of design and should be optimised relative to its context. Waterside development in the Royal Borough is also mentioned, where the expectation is that it improves the character and setting of the River Thames, Chelsea Creek and the Grand Union Canal (CL1).

**A1.14** How a building relates to its context is also covered by policy CR2, which discusses the three-dimensional street form and the sense of place. Where development would make a significant change to the form of existing streets, the Council expects the

resultant street form and character to draw upon traditional townscape qualities. It requires among other factors that:

- the ratio of building height to street width to give a coherent and comfortable scale to the street
- require building lines and building scales to be consistent and related to context
- require a frequency and rhythm of building entrances and windows that support active street frontages and optimises community safety.

**A1.15** The densely developed nature of the Royal Borough is such that amenity is a critical factor in the quality of life for all. As such it will protect the daylight, sunlight, visual privacy, sense of enclosure and other amenities enjoyed by users of existing buildings and spaces, and require equally high levels of amenity in any new development (CL5).

**A1.16** The Borough will protect its heritage assets, protecting its listed buildings, scheduled ancient monuments and sites of archaeological interest and their settings (CL4), and preserve and enhance the character or appearance of conservation

areas, historic places, spaces and townscapes, and their settings (CL3). This protection extends to resisting development that has an adverse effect upon the environmental and open character or visual quality of Metropolitan Open Land, garden squares, and parks and gardens of Special Historic Interest (CR5).

**A1.17** Views are referred to in policies CL1 and CL2, where it is made clear that development should not have a harmful impact upon strategic and local views. The latter includes local vistas and gaps between developments, which are often planned aspects of townscape, particularly within the Victorian period, and make an important contribution to the character and appearance of conservation areas.

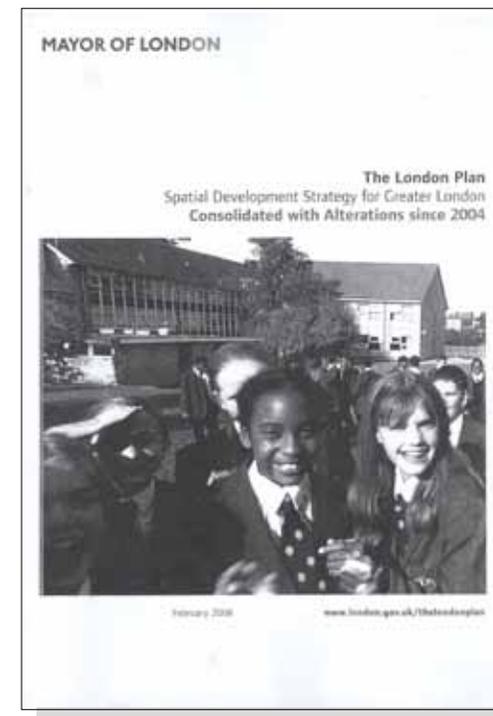
**A1.18** It is significant that the Core Strategy does not replace design policies CD1, 2, 8-11, 13-15, 17 and 63 of the UDP. These design policies provide detailed management policies for the protection of the strategic view and other views of metropolitan and borough significance. They comprise views and vistas of the riverside, Royal Hospital, South Kensington Museums, Kensington Gardens and Holland Park. Policy CD63 protects views generally of conservation areas (see para A1.6-7, earlier). The UDP

policies remain in force and will continue to do so until such time as the Council prepares and adopts a specific SPD on the designation and management of views within the Royal Borough, as referenced in the Local Development Scheme (March 2010).

**A1.19** There are buildings within the Royal Borough that are regarded as highly disruptive to visual quality of the Royal Borough. The Core Strategy refers to them as 'eyesores' and promotes their removal and replacement with buildings better suited to their context. Two eyesore buildings are currently identified: Holiday Inn (Forum Hotel) in Gloucester Road and Newcombe House in Notting Hill Gate, both of which are tall buildings (para 34.3.17, policy CL2c).

### Metropolitan policy context The London Plan (GLA, February 2008)

**A1.20** The London Plan provides the London-wide context within which individual boroughs must set their local planning policies and sets the policy framework for the Mayor's involvement in major planning decisions in London. The Plan requests boroughs ensure that developments, among other principles, maximise the potential of sites; are sustainable, durable and adaptable; and respect local context, history, built





heritage, character and communities (para. 4.98). Policy 4B.8 states that 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.

**A1.21** Specific policies on tall buildings are contained in Policies 4B.9 and 4B.10. Other pertinent policy topics are sub-regional mechanisms for controlling and co-ordinating growth; and the London View Protection Framework (4B.16-18), which is complemented by the London View Management Framework SPG.

#### **Policy 4B.9 Tall buildings - location**

**A1.22** This policy states that ‘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 policy also indicates that ‘boroughs may wish to identify defined areas of specific character that could be sensitive to tall buildings within their development plan documents.

In doing so boroughs should clearly explain what aspects of local character could be affected and why. They should not impose unsubstantiated borough-wide height restrictions’. The Plan also emphasises that compact city and intensive development does not necessarily imply tall buildings and that London has achieved some of its highest residential densities in relatively low-rise areas (para. 4.120).

#### **Policy 4B.10 Large-scale buildings – design and impact**

**A1.23** According to this policy, large-scale buildings (including tall buildings) should be of the highest quality design and, among other matters:

- meet the requirements of the View Protection Framework set out in Policy 4B.16
- 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

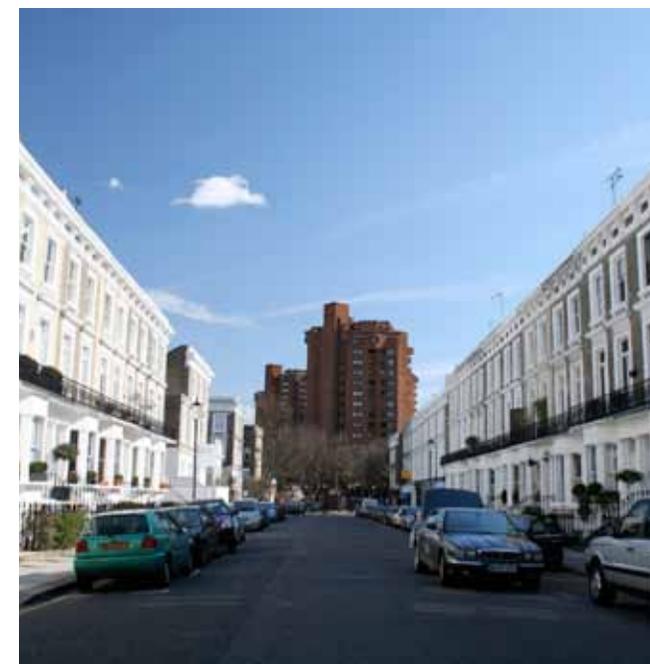
- be sensitive to their impact on micro-climates in terms of wind, sun, reflection and overshadowing
- pay particular attention, in residential environments, to privacy, amenity and overshadowing
- be appropriate to the transport capacity of the area ensuring adequate, attractive, inclusive and safe pedestrian and public transport access.

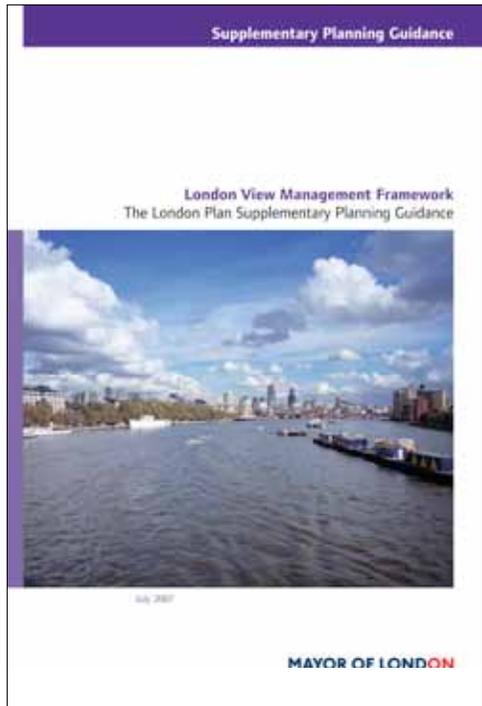
### Policies 2A.3 – 2A.7 Sub-regional Planning

**A1.24** These policies set out the sub-regional mechanisms for controlling and co-ordinating growth, and for making the most of development opportunities across the Capital. They do not generally refer to the types of built form, but to the location and overall intensity of growth, referring to the need to maximise or densify development in identified parts of the Capital. They define the Central Activities Zone,<sup>94</sup> Opportunity Areas, and Areas for Intensification and Regeneration Areas.

**A1.25** Opportunity Areas are major brownfield sites regarded as capable of accommodating the substantial proportion of new homes and jobs in London, and the London Plan seeks to maximise their potential through significant increases in density. Areas of Intensification contribute likewise, but on a lower scale, with redevelopment offering the chance for higher densities, more mixed and intensive uses. It is notable that the London Plan does not identify any Opportunity Areas or Areas of Intensification within the boundaries of the Royal Borough of Kensington and Chelsea. White City is the closest Opportunity Area to the Royal Borough, located immediately to the west of the boundary in the London Borough of Hammersmith and Fulham. Paddington and Victoria in the City of Westminster are also identified.

**A1.26** Regeneration Areas cover the 20% most socially and economically deprived wards of all London boroughs, and include parts of North Kensington. The problem is of ‘social exclusion’ and of bringing about regeneration, development and transportation proposals that improve access to better health, education, health, employment, housing and the environment. Policy 2A.5 refers to exceeding the minimum guidelines for housing; maximising access by





public transport; and ‘delivering good design, including public realm, open space and, where appropriate tall buildings’. Linking in to near-by Opportunity Areas is seen as critical.

### London View Management Framework

**A1.27** Since 16th May 2007 strategically important views in London have been subject to new directions pertaining to ‘Protected Vistas’ issued by the Secretary of State for Communities and Local Government. This replaces the regional guidance RPG3a and in addition to the ten strategic views, eight of St Paul’s Cathedral and two of the Palace of Westminster, an eleventh view from City Hall to the Tower of London has been identified. The Royal Borough of Kensington and Chelsea are crossed by one Protected Vista, St Paul’s Cathedral from King Henry’s Mound in Richmond.

**A1.28** The London Plan recognises the value of London’s historic built environment and the need to protect its most important views. It contains three policies (4B.16 - 4B.18) aimed at protecting strategic views complemented by the SPG, which provides further guidance on how these policies operate. Borough development plans should be in general conformity with the London Plan.

### Policies 4B.16 – 4B.18 Designation and management of views

**A1.29** The London Plan Policy 4B.16 (and its associated Table 4B.1) designates 26 strategically important views of four types: London panoramas, river prospects, townscape views and linear views. The Mayor will keep the list of designated views under review. The policy indicates that 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.<sup>95</sup>

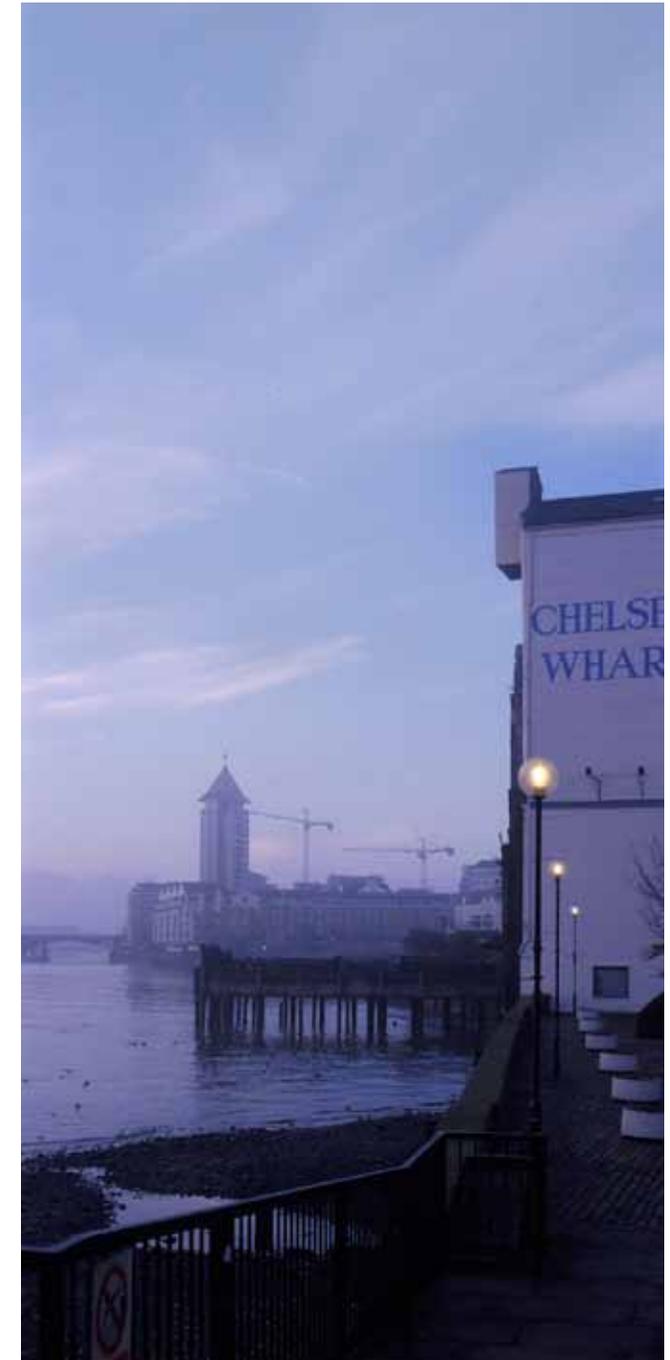
**A1.30** The Mayor has prepared management plans for each of the designated views. The Royal Borough of Kensington and Chelsea is crossed by one protected vista, St Paul's Cathedral from King Henry's Mound in Richmond.

**A1.31** The management plans seek to identify landmark buildings and 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. The plans also clarify appropriate development height thresholds and protect backgrounds that give a context to landmarks. Policy 4B.17 makes it clear that 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.

**A1.32** Policy 4B.18 provides guidance on assessing the impact of a proposed development on designated views. It identifies four assessment areas:

- landmark viewing corridors
- front and middle ground assessment areas
- landmark lateral assessment areas, and
- landmark background assessment areas.<sup>96</sup>

**A1.33** Accordingly boroughs should refuse or direct all development within landmark viewing corridors above threshold heights, and development within landmark background and lateral assessment areas, which 'fails to preserve or enhance the ability to recognise and appreciate landmark buildings'. Developments in front and middle ground assessment areas of designated views that are 'overly intrusive, unsightly or prominent to the detriment of the view as a whole' should also normally be refused.



### London View Management Framework SPG (GLA, July 2007)

**A1.34** The SPG gives further guidance on the policies in the London Plan with respect to the protection of strategic views. For each designated view the SPG provides a Management Plan, as required by Policy 4B.16, which describes the viewing locations and the extent of Landmark Viewing Corridors, Front and Middle Ground Assessment Areas, Lateral Assessment Areas and Landmark Background Assessment Areas.

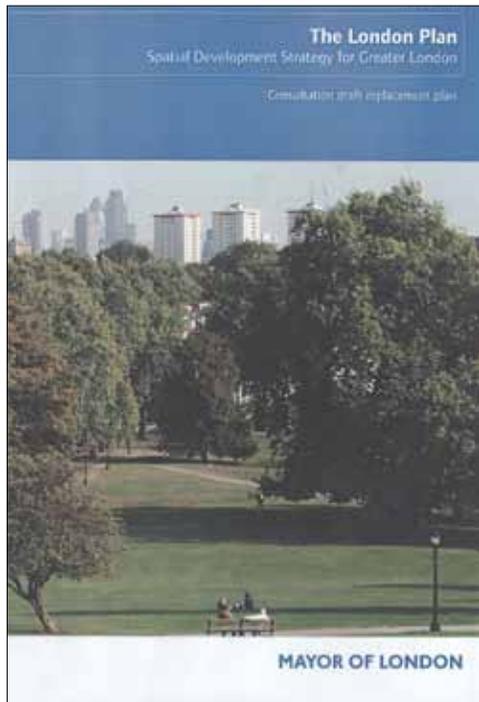
**A1.35** Designated views are managed through a combination of qualitative assessment and geometric view corridor technique (Protected Vista). In most of the views designated by the London Plan, the Mayor does not seek to impose geometric control over development, but rather to encourage the assessment of the effect of each development on the view as a whole (para. 3.2). The SPG introduces the concept of 'Qualitative Visual Assessment'(QVA) as the primary tool for the management of new developments that could affect designated views. QVA is based upon analysis of a variety of visual materials provided by the developers, including 'Accurate Visual Representations' (AVRs) – photomontages or three-dimensional computer models – generated from relevant

'Assessment Points'.<sup>97</sup> Assessment Points are specific positions identified by the London Plan (indicated through coordinates and heights) from which one of the Designated Views can be particularly well appreciated. The Mayor proposes that the Assessment Points should be used as a common starting point for analyses of visual impact in order to provide consistency and comparability among proposals (para. 3.19).

**A1.36** The qualities of some significant views on important landmarks are such that they require management by geometric definition (para. 4.1). Protected Vistas include three managed zones defined as Landmark Viewing Corridors, Landmark Lateral Assessment Areas and Landmark Background Assessment Areas. In each zone development threshold heights are defined, above which developments are likely to have a negative impact on the landmark and will normally be refused.

### THE LONDON PLAN: CONSULTATION DRAFT REPLACEMENT (GLA, October 2009)

**A1.37** The Mayor has opted to move straight to a full review of the London Plan rather than seeking incremental changes to the current statutory document. The replacement process has started with the publication of



the consultation draft plan, and whilst the February 2008 Plan remains in force and has legal status as part of the boroughs' development plan, the new plan is a material consideration that can be taken into account and will gather weight the further the replacement process goes. The formal replacement plan is expected towards the end of 2011 (para 0.8).

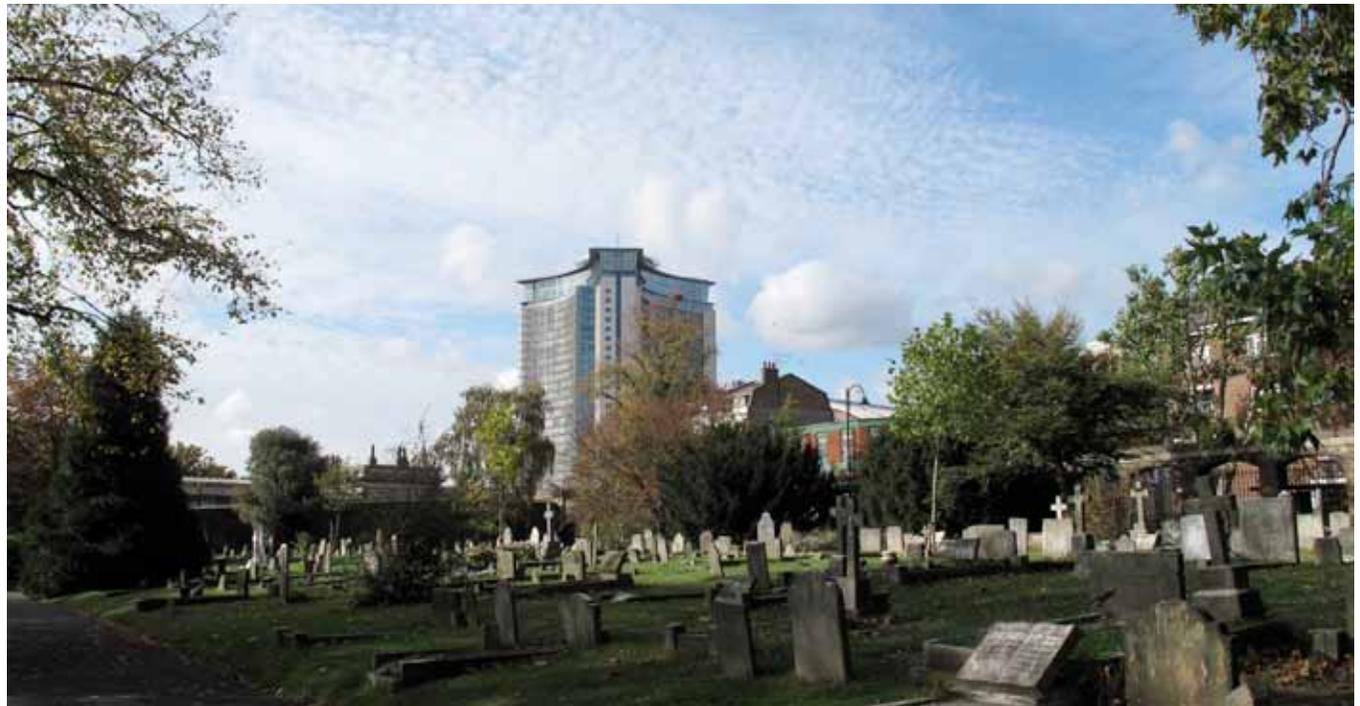
**A1.38** Part of the context for the replacement plan is a new focus on quality of life issues affecting London and its population. Among these is the growing concern of 'protecting and enhancing what is distinctive about the city and its neighbourhoods, securing a sense of place and belonging through high quality architecture and design that sits well with its surroundings' (para 1.42). The new plan sets out the overall strategic vision that during the lifetime of the new plan and beyond, London should 'excel among global cities'. The vision is supported by 6 detailed objectives that pick up on the quality of life concerns, and in the above instance seeks to ensure London is 'A city that delights the senses and takes care of its buildings and streets, having the best modern architecture while also making the most of London's built heritage, and which makes the most of and extends its wealth of open and green spaces and waterways...'. (paras 1.49-50).

**A1.39** Specific reference is made to tall buildings in Policy 7.7. Other pertinent policy topics are local character (Policy 7.4), heritage assets (Policy 7.8) and the London View Protection Framework (Policies 7.11-12).

### **Policy 7.7 Location and design of Tall and large buildings**

**A1.40** This policy and its supporting text describe how tall and large buildings can form part of the strategic approach to meeting the London Plan's goals for

regeneration and economic development, but cautions against any detrimental impacts they may have upon local character. It is therefore suggested that such buildings 'should be resisted in areas that will be particularly sensitive to their impacts and only be considered if they are the most appropriate way to achieve the optimum density in highly accessible locations or to ensure the best local design outcome, and if they make a significant contribution to local regeneration'.



**A1.41** The Central Activities Zone, Opportunity Areas, Areas of Intensification or Town Centres that have good access to public transport are possible locations for tall buildings, whilst conservation areas, the settings of listed buildings, historic parks and gardens, the edge of metropolitan open land and world heritage sites might be unsuitable locations. The policy resists tall buildings that have an adverse impact on the amenity of their surroundings, and similarly those impacting upon local or strategic views. It sets out a number of design criteria, according to which tall and large-scale buildings should:

- Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features) particularly at street level
- Individually or as a group form a distinctive landmark that emphasises a point of civic or visual significance, and enhances the skyline and image of London
- Incorporate the highest standards of architecture and materials

- Have ground floor activities that provide a positive relationship to surrounding streets
- Incorporate publicly accessible areas on the upper floors, where appropriate
- Make a significant contribution to local regeneration.

**A1.42** The policy indicates that boroughs and the Mayor should work together to identify locations where tall buildings might be appropriate and suggests that Opportunity Area Planning Frameworks are a ‘useful opportunity for carrying out such joint work’. (para 7.23).

#### Policy 7.4 local character

**A1.43** This policy refers to the important role that the physical character of a place has in reinforcing the social, cultural, environmental and economic relationships between people and their communities. In some places the character is well preserved and clear, whilst in others it is undefined or compromised by unsympathetic development. New development is expected to:

- have regard to the existing urban structure and built form
- be of human scale

- allow existing buildings and structures that make a positive contribution to the character of a place to continue to do so
- be informed by the surrounding historic environment.

and include significant buildings or urban landscapes that help define London at a strategic level. The Mayor has prepared guidance on the management of each of the designated views, and will keep both the list of designated views and the guidance under review.

### Policy 7.8 heritage assets and archaeology

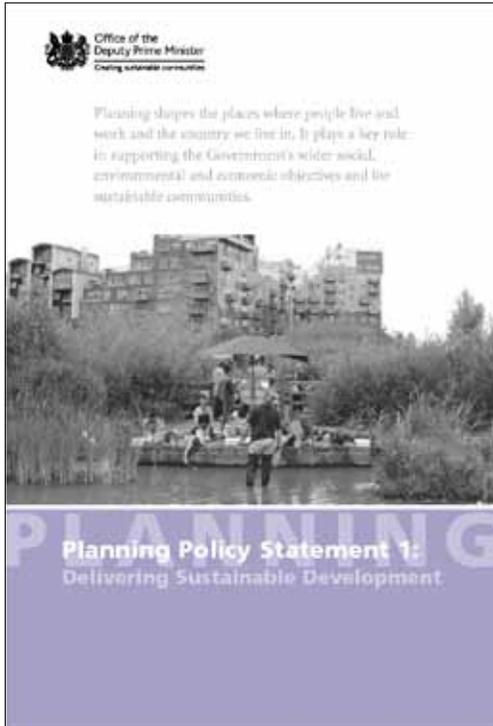
**A1.44** According to this policy London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. It is important to sensitively manage these historic assets whilst promoting the highest standards of modern architecture, blending the old and new in a way that gives London its unique character. Development in or near conservation areas and listed buildings should therefore be 'sympathetic to their form, scale, materials and architectural detail'.

### Policy 7.11-12 london view management framework

**A1.45** The London Plan Policies 7.11 (and its associated Table 7.1) designates 26 strategically important views of three types: London panoramas, townscape views (including linear views) and river prospects. These are views that are seen from places that are publicly accessible and well used,

**A1.46** The Mayor has also identified three strategically important landmarks within the designated views; St Paul's Cathedral, the Palace of Westminster and the Tower of London; and has sought to protect vistas towards these landmarks by designating Landmark Viewing Corridors and Wider Setting Consultation Areas. The Royal Borough of Kensington and Chelsea is crossed by one such Protected Vista, St Paul's Cathedral from King Henry VIII's Mound in Richmond Park

**A1.47** Policy 7.12 provides guidance on assessing the impact of new development on designated views and protected vistas. Of relevance, development within landmark viewing corridors that is above the threshold height has a negative impact on the viewer's ability to see the landmark and should be refused. Similarly, development that is located within the foreground and middleground of the view and dominates the landmark should be refused.



## Policies 2.9 – 2.14 Sub-regional Planning

**A1.48** These policies set out the sub-regional mechanisms for controlling and co-ordinating growth, and for making the most of development opportunities across the Capital. They do not generally refer to the types of built form, but to the location, land use activities and overall intensity of growth, referring to the need to optimise development in identified parts of the Capital. They define the Central Activities Zone, Opportunity Areas, Intensification Areas and Regeneration Areas.

**A1.49** Opportunity Areas are major brownfield sites with significant capacity to absorb new housing or commercial development, typically accommodating at least 5,000 jobs or 2,500 new homes or a combination of both. Intensification Areas are built-up areas that likewise have significant capacity for new jobs and homes but on a lower scale, achieved principally through redevelopment at increased densities. Notably, the Mayor offers partnership working to prepare planning frameworks for Opportunity Areas, and recognises that 'there are different models for carrying these forward' (Policy 2.13).

**A1.50** The London Plan identifies Earl's Court and West Kensington, which straddles

the western Borough boundary with the London Borough of Hammersmith and Fulham, and Kensal Canalside in the north of the Borough as Opportunity Areas. Annex 1 of the Plan refers to Earl's Court and West Kensington as offering the potential for a strategic leisure, cultural and visitor attraction and strategically significant offices with supporting infrastructure, with an indicative 7,000 new jobs and/or 2,000 new homes on the 31ha site (p. 217). Kensal Canalside is seen as an important opportunity to promote regeneration in north Kensington, with the potential for 1,000 new jobs and/ or 2,000 new homes on the 20ha site. However, the final number is very dependent upon overcoming major shortcomings in public transport provision, limited physical access and the development constraints imposed by the existing gasholders (p. 220).

**A1.51** Beyond the Borough boundary, White City is the closest Opportunity Area, located immediately to the west in the London Borough of Hammersmith and Fulham. Further away, Paddington and Victoria in the City of Westminster are also identified. There are no Intensification Areas within the Borough or close to its boundaries.

**A1.52** Regeneration Areas cover the 20% most socially and economically deprived

wards of all London boroughs, and include parts of North Kensington. The problem is of 'social exclusion' and of bringing about regeneration, development and transportation proposals that improve access to better health, education, health, employment, housing and the environment. The boroughs and Local Strategic Partnerships are regarded as the key agencies in addressing the problem with neighbourhood-based action and investment, with the Mayor offering strategic support.

### National policy context

**A1.53** Planning Policy Guidance notes (PPGs) and their replacements Planning Policy Statements (PPSs) give guidance from Government to local authorities and others on planning policy and the operation of the planning system. Local authorities must take their contents into account when preparing their development plans. The guidance may also be relevant to decisions on individual planning applications and appeals.

### PPS1 (ODPM, 2005)

**A1.54** PPS1 sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system. The guidance states that the Government is committed to protecting and enhancing the quality of the natural and

historic environment and that a high level of protection should be given to most valued townscapes and landscapes (para. 17).

**A1.55** PPS1 also underlines the importance of high quality design: good design ensures attractive, usable, durable and adaptable places and is a key element in achieving sustainable development (para. 33). Planning authorities should therefore plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Good design should be integrated into the existing urban form and the natural and built environments (para. 35) and policies should ensure that developments respond to their local context and create or reinforce local distinctiveness (para. 36). The guidance makes it clear that design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted (para. 34).

### By Design (CABE/DETR, May 2000)

**A1.56** PPS1 is supported by good practice guidance (para. 37) 'By Design – Urban design in the planning system: towards better practice'. By Design encourages attention to



the design of the built environment and sets out a number of principles of good urban design to aid the creation of attractive and sustainable places. The guidance advises that scale, massing and height of proposed developments should be considered in relation to that of adjoining buildings, the topography, the general patterns of heights in the area, as well as views, vistas and landmarks. It also states that the character of townscape depends on how individual buildings contribute to a harmonious whole, through relating to the scale of their neighbours and creating a continuous urban form (p.21).

**A1.57** To enhance local distinctiveness developments should respond to local building forms and patterns of development as well as local materials, building methods and details. The good practice advice is that a building should only stand out from the background of buildings if it contributes positively to views and vistas as a landmark. According to the guidance buildings with functions of civic importance are one example. The massing and height of a building should also have regard to the degree to which it will overlook and overshadow other buildings and relate to the width of the street (p.23).

**A1.58** By Design underlines that higher density commercial and mixed-use developments, civic buildings and developments likely to generate large numbers of visitors are best located within close walking distance of public transport interchanges (p.27).

#### PPG13 (DCLG, November 2006)

**A1.59** The Government's planning policies for transport are set out in PPG13. The guidance advises that in preparing their development plans and in determining planning applications, local authorities should promote high density, mixed-use development in and around town centres and near to major transport interchanges (para. 76). Where developments will have significant transport implications, Transport Assessments should be prepared and submitted alongside the relevant planning applications for development (para. 23).

#### PPS5 (DCLG, March 2010)

**A1.60** Government guidance on the protection of the historic environment is particularly pertinent to tall building proposals in the Royal Borough. The guidance treats the historic environment in a seamless manner describing any designated historic feature, such listed buildings, scheduled monuments, conservation

areas and registered parks and gardens as 'heritage assets'. The overarching aim is that 'the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations.' It regards these assets as non-renewable resources which should be protected in a way that reflects their significance, but accepts that carefully managed change may take place.

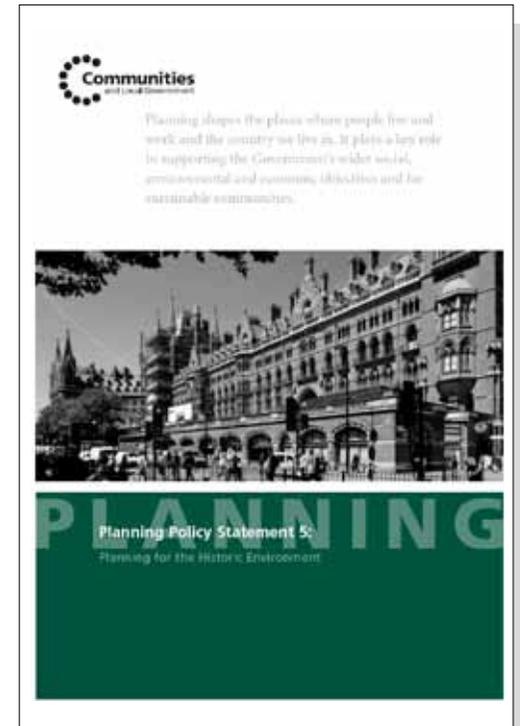
**A1.61** Policy HE3 requires the local authority in preparing its Local Development Framework (LDF) to set out positive, proactive strategies for conservation of the historic environment. In doing so it should take into account several factors, among which is the contribution that the historic environment makes in terms of its:

- influence on the character of the environment and an area's sense of place
- potential to be a catalyst for regeneration in an area
- stimulus to inspire new development of imaginative and high quality design. (footnote HE3.1)

**A1.62** Policy HE10 is concerned with the setting of a historic asset, the extent and importance of which is defined by visual, environmental and spatial considerations. Setting is seen as being generally more extensive than curtilage and may change as an asset or its surroundings evolve or as our understanding of the asset improves. (para 115-116). According to the policy local planning authorities should

- treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset (HE10.1)
- identify opportunities for changes in its setting to enhance or better reveal the significance, which if taken are seen as a public benefit and part of the place-shaping process. (HE10.2)

**A1.63** The practice guidance notes accompanying policy HE10 notes that where new development affects the setting of a heritage asset, its design may play an important part in determining its impact. Where it does it should be designed carefully to respect the setting in terms of its scale, proportion, height, massing, alignment and use of materials (para 121).



## Guidance on tall buildings

July 2007

This document sets out how CABI and English Heritage works together to assess tall buildings. It also offers advice on good practice in relation to tall buildings in the planning process. CABI organisations recommend that local planning authorities use it in their public making and, if necessary, to evaluate planning applications for tall buildings where the appropriate policies are not set in place. The document includes this guidance which is capable of being a material consideration in the determination of planning applications.

ENGLISH HERITAGE



### Guidance on tall buildings (English Heritage/ CABI, July 2007)

**A1.64** This guidance sets out the criteria that both English Heritage and CABI apply when assessing proposals for tall buildings. The guidance encourages local planning authorities to identify suitable locations where tall buildings are, and are not, appropriate, in areas where such developments are a possibility (para. 2.4).

**A1.65** In identifying appropriate and non-appropriate locations for tall buildings, local authorities should carry out a detailed urban design study (para. 2.7). This study should identify those elements that create local character as well as other important features and constraints. It should consider 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. Having identified the constraints and opportunities through an urban design study, specific policies and locations should be included in development plans clearly identifying, in map-based form, areas which are appropriate, sensitive or inappropriate for tall buildings. In some historic towns and areas, historic environment considerations may be of such significance that no tall buildings will be appropriate (para. 2.8).

**A1.66** Applicants seeking planning permission for tall buildings should ensure that proposals will conserve, or not damage or detract from (para. 4.6 ii):

- Listed buildings and their settings, including the foregrounds and backdrops to landmark buildings
- Conservation areas and their settings
- Historic parks and gardens, landscapes and their settings
- Other open spaces, including rivers and waterways, their settings and views from them
- Other important views, prospects and panoramas.

**A1.67** In many cases the argument for high density development has been used to support proposals for tall buildings. The guidance, however, emphasises that tall buildings are only one possible model for high density development (para. 1.3).

## APPENDIX II

### CONTENT OF PLANNING APPLICATIONS FOR TALL BUILDINGS

**A2.1** Applicants seeking planning permission for tall buildings in the Borough must submit full planning applications for their proposals. Outline planning applications for tall buildings are not accepted. The applicants should ensure that the below supporting information is provided so that a thorough assessment of the design qualities can be made:<sup>98</sup>

- Survey plan and calculations that illustrate the heights of the proposed building and its surrounding context to determine whether the building is significantly taller than its surroundings and the proportional relationship.
- Tall building statement that evaluates the benefits and justifications for a tall building on the proposed site in terms of the tests set out in this SPD and the design criteria used to assess tall building proposals.
- Evidence to demonstrate that the viability and appropriateness of other forms of high density development have been explored.
- Design and access statement that sets out the architectural and urban design rationale for the proposal and addresses among other factors the development context, development objectives, relationship with the street and neighbouring buildings, relationship to open space (including waterways) scale and massing, alignment, density, materials, detailing, lighting (day and night time), existing and proposed land and building uses, ground floor uses, treatment of rooftop/crown, ground floor treatment, landscaping and public realm strategy.

- Visual impact assessment study to illustrate the impact on the context, especially on heritage assets and significant views. This should include a computer-generated zone of visual influence and the impact on local, medium and long distant views which should be done through accurate visual modelling of proposals – photomontages or three-dimensional computer models (buildings fully rendered) – from relevant assessment points defined by the Council. Proposals should be shown in daylight and night conditions and in different seasons.<sup>99</sup>
- Physical impact assessment study to illustrate the impact on micro climatic conditions (wind tunnel studies, sun path studies, overshadowing, heat island and glare studies), privacy and overlooking, telecommunications, and subterranean service infrastructure.
- Movement statement that provides a traffic impact assessment, including car parking, pedestrian movement and public transport needs, and a servicing strategy.
- Building services strategy, including building systems and enclosure, energy consumption and efficiency, lighting (day and night time), waste storage and disposal, and maintenance.
- Sustainability statement outlining how the building will apply best sustainable practices, including energy management and production, resource conservation, materials specification and waste management. A recognised method of sustainability assessment should be used (e.g., BREEAM, EcoHomes).

**A2.2** The greater the scale, impact and complexity of the proposals, the more detailed and comprehensive the statements should be. Applications submitted without the above supporting information may lead to a planning refusal on the grounds of insufficient information to allow the application to be fully and effectively assessed.

**A2.3** Where on near-by sites there are existing tall buildings or extant permissions or concurrent proposals for tall buildings that have a bearing on the proposal's consideration, every effort should be made to include the relevant additional information. The potential clustering and cumulative effects of tall buildings must be addressed in the submission.

**A2.4** An Environmental Impact Assessment (EIA) is likely to be required for tall building proposals. To avoid duplication, on submission the applicants may wish to include the above impact studies within the EIA.

**A2.5** Applicants are strongly encouraged to discuss their proposals for tall buildings with planning and design officers as pre-applications, with discussions beginning as early as the concept stage. Draft plans and

initial design statement and impact studies are important to these discussions and should be made available to the officers at the earliest opportunity.<sup>100</sup>

**A2.6** To help ensure design excellence, the scheme architects will be invited by the Council to present their proposals to its Architecture Appraisal Panel (AAP) for its advice.<sup>101</sup> The Council also strongly encourages the applicants of tall building proposals to seek the views of the Commission for the Built Environment (CABE), English Heritage (EH) and Greater London Authority (GLA) at an early stage.<sup>102</sup>



## APPENDIX III

### DESIGN EVALUATION CHECKLIST FOR TALL BUILDINGS

**A3.1** This section provides a checklist for assessing the design qualities of tall building proposals in the Royal Borough of Kensington and Chelsea. It draws upon tall building design matters contained within both this document and the English Heritage/ CABI guidance.<sup>103</sup> It does not replace the relevant policies and guidance, and therefore must be read in conjunction with the main body of this document and Appendix 1.

**A3.2** Tall buildings present a number of design challenges and opportunities. Applicants seeking planning permission for tall buildings should ensure that the following matters are addressed:

**Relationship to context** – response to its local context in terms of siting, height, massing, scale, urban grain, streetscape, built form, alignment, articulation, materials, architectural language, detailing, open spaces and waterways.

**Impact on historic assets** – response to heritage assets in terms of scheduled monuments, listed buildings, conservation areas, registered parks and gardens, archeological remains, including their settings and views.

**Impact on views** – response to strategic and local views, prospects and panoramas; contribution to the skyline in terms of building proportion, silhouette and crown and in its relationship to other existing tall buildings; removal of an existing tall building that seriously detracts from the visual experience of the borough; formation of an attractive new vista; and articulation of a point of townscape legibility.

**Architectural quality** – architectural form, composition, integrity and inventiveness, forming a distinguished landmark, with detailed consideration given to its scale, height, massing, proportion, slenderness ratio and silhouette, facing materials and detailing and relationship to other structures, and incorporation of the building services and telecommunications equipment as integral to the design; addresses quality of life of those using the building in terms of function, fitness for purpose, access, safety and amenity; and building robustness, allowing adaptation over time.

**Relationship to public realm** – interaction with the surroundings at street level in terms of well defined edges and public space enclosure, activated frontages with transparent facades, and the provision of public space or facilities; contribution to the safety, diversity, vitality, social engagement and ‘sense of place’; and maximises access for people of all abilities .

**Urban design quality** – addresses connectivity of the site and permeability of the wider area, and accessibility to all; and contribution to the legibility of the townscape through the opening up or effective closure of views and articulation of a point of significance.

**Impact on local environment** – addresses any microclimatic effects of air turbulence and diversion of winds to ground level, loss of daylight/ sunlight, overshadowing of adjacent buildings and open space, glare and noise reflection through careful siting and orientation, sensitive architectural form (design of floorplate, massing, height, setbacks) and use of architectural devices (awnings, skirts, terraces); and if lit at night, how well designed and appropriate it is to the building and its setting.

**Delivers sustainability** – use of the latest sustainable design and construction practices and technologies, with detailed consideration given to the built form configuration and orientation, energy sources and conservation, material source and lifecycle, internal temperature control and use of natural ventilation, water use and conservation and mitigation of water run-off, waste management and on-site ecology; enhances long-term energy and resource efficiency by designing for flexibility and building adaptation; BREEAM or EcoHomes rating, or a recognised lequivalent.

**Protection of design quality** – capability and commitment to carry through the vision and design qualities set out by the original architect during the process of procurement, detailed design and construction.

**Land use** - provision for a strategic London-wide public use; uses that activate the building at grade level; public access to the building, especially at grade and/ or high level.

**A3.2** Tall building proposals will also be assessed against other relevant planning criteria, such as impact on and contribution to land use patterns and mix, local public infrastructure and facilities, transport infrastructure and services. Please refer to the Borough’s development plan for details.

# ENDNOTES

## SECTION I

- 1 Spiro Kostof, *The City Shaped*, London 2001, p. 296.
- 2 Statutory plan comprises Core Strategy, Saved UDP policies not replaced and the London Plan.
- 3 Core Strategy as submitted to the Secretary of State, 19 March 2010, but with amendments suggested to the inspector, and the Unitary Development Plan, until such time as policies Strat10, CD27-28, and CD57 of the UDP are replaced by an adopted Core Strategy. Policies CD1,2, 8-11, 13-15, 17 and 63 of the Unitary Development Plan are saved policies that are not replaced by the Core Strategy and remain in operation for development management.
- 4 London Plan, para. 4.119. The London Plan also defines tall buildings as being larger than the threshold sizes set for the referral of planning applications to the Mayor. This part of the definition is not relevant to a borough level SPD.
- 5 Based on a street width of 25m and building height of 15m, as explained in more detail in section 3.
- 6 CABE/EH, para 2.4-2.6
- 7 London Plan, Policy 4.B.9
- 8 London Plan, Policy 4.B.9
- 9 CABE/EH, para 2.7
- 10 Examples are WCC, LB Hackney, LB Islington, Brighton+Hove, Cardiff.

## SECTION 2

- 11 In some of these blocks the interior is built over or comprises mews developments.
- 12 Source RBKC, Forward Planning, August 2006.
- 13 Lancaster West and Silchester Estates comprises Grenfell tower on Silchester East and 4 point blocks of Silchester West.
- 14 Built 1967-77, 7 towers 18 – 20 storeys (54-64m), architects: Eric Lyons and HT Cadbury-Brown, architects; ECD Owned and managed by the London Borough of Hammersmith and Fulham
- 15 21-24 storeys.
- 16 Built 1968-72, 31 residential storeys and 35-storey service tower.
- 17 Built 1973, 27 storeys, architect: Richard Seifert.
- 18 Submission Core Strategy, 19 March 2010, para 34.3.17.
- 19 Height of Point West is 20 storeys above deck over the Circle Line railway.
- 20 The same cannot be said of the 31 storey (117m or 385ft) Empress State building, built in 1961 as decentralised offices for the Admiralty. Its considerable height and bulk form a highly conspicuous and disruptive feature on the skyline of southwest Chelsea.

## SECTION 3

- 21 Michelin House, built 1915, architect: J.Espinasse of Clermont-Ferrand, grade II listed.
- 22 Chelsea Town Hall, built 1906-18, architect: Leonard Stokes, grade II listed.
- 23 The Commonwealth Institute, built 1960-2, architects: Robert Matthew, Johnson-Marshall and Partners, grade II\* listed.
- 24 Cadogan Hall, built 1904-9, architect: R. Chisholm, grade II listed.
- 25 St. Columba's Church, built 1950-55, architect: Sir Edward Maufe, grade II listed.
- 26 Exceptions are where adjacent to parks and other large public open spaces.

- 27 UDP, Policy CD28b.
- 28 Spiro Kostof, The City Shaped, London 2001, p. 335.
- 29 By Design cites buildings with functions of civic importance as one example where a building could stand out from its background, contributing positively to views and vistas as a landmark building. [page 21, By Design, DETR, 2000]
- 30 London Plan; para 4.123.
- 31 UDP, Policy CD27-28 and Core Strategy, para 34.3.26.
- 32 This does not exclude tall or bulky features, such as a skylon or wind turbine – e.g., Strata building in Elephant and Castle (2008-10) by architects: Hamilton Architects, where the final 20m of 148m building (43 storeys) comprises 3 wind turbines.

#### SECTION 4

- 33 PPS1, para 17
- 34 Core Strategy, para 43.1.1. Westminster ranks 1st on both counts with a staggering 10,499 listed buildings and 78% conservation area coverage.
- 35 PPS1, By Design, PPG15, English Heritage/CABE's Guidance on tall buildings and the London Plan, as well as the Kensington and Chelsea UDP.
- 36 By Design – urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.21.
- 37 CABE/EH, para 2.6
- 38 UDP, Policy CD61, Strat 10
- 39 CABE/EH, para 2.6ii
- 40 UDP, Policy CD25, 63 and 69
- 41 UDP, Policy CD61, Strat 10
- 42 Core Strategy, para 34.3.33.

- 43 The London Plan states that boroughs should base the designation and management of local views in their DPDs on London Plan Policies 4B.16-4B.18.
- 44 London panoramas are defined in the London Plan as elevated panoramic views of central London and its suburbs from important public open spaces;
- 45 River prospect – broad prospect offers a wide view that has a changing edge condition, usually a corridor setting or linear view along a river.
- 46 Townscape view – focus on architecturally and/or culturally significant groups of buildings from a public space.
- 47 Linear – view of key landmark (e.g., Buckingham Palace and St Paul’s Cathedral)
- 48 UDP, Policy CD13
- 49 UDP, Policy CD15
- 50 UDP, Policy CD8
- 51 UDP, Policy CD63
- 52 UDP, Policy CD63
- 53 UDP, Policy CD1. In considering proposals for Riverside development, the Council will also take into account views from the opposite bank of the Thames (para. 4.2.5). The Borough will raise objection to development in adjoining Boroughs, which adversely affect views from the Chelsea riverside and its environs (CD2).
- 54 UDP, Policy CD14
- 55 UDP, Policy CD17 and London Plan, Policy 4.B.18
- 56 UDP, Policy CD14
- 57 UDP, Policy CD8
- 58 UDP, Policy CD10
- 59 UDP, Policy CD11

- 60 The Council has prepared conservation area statements for all its conservation areas (with the exception of Colville), which describe the areas and include proposals for their preservation and enhancement. They are adopted SPGs.

## SECTION 5

- 61 Core Strategy policy CL2 = London Plan policy 4.3.10 PPS1 supports design excellence, a view endorsed by EH/CABE para 2.6.
- 62 Aspect ratio of a building is the ratio of its height dimension to its width dimension.
- 63 CABE/EH, para 4.1.7
- 64 London Plan, Policy 4.B.9
- 65 By Design – urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.21.
- 66 This is subject to each case being considered on its planning merits.
- 67 LPAC Study; May 1999 (ADV 83) and October 1999 (ADV 85)
- 68 London Plan, Policy 4.B.9 and para 2.13
- 69 Planning for a better London, GLA, July 2008, p.22.
- 70 Retail and Leisure Needs Study, July 2008, Nathaniel Litchfield and Employment Land Study, Roger Tym and Partners, January 2009 (update). Figures are gross additional floorspace and include 20,000 sqm of offices allocated between Kensal and Earl's Court. Retail figures include convenience and comparison retail floorspace, though only until 2015).
- 71 London Plan Policy 4.B.9
- 72 LPAC Study; May 1999 (ADV 83) and October 1999 (ADV 85)
- 73 Warwick Road and Wornington Green will provide over 2,200 new homes in total, public realm improvements and social infrastructure, kick-started by a strong commitment to high quality design and without recourse to a tall building.

- 74 London Plan, para 2.13.
- 75 London Plan, para 4.121
- 76 West Kensington is in the LB Hammersmith and Fulham
- 77 London Plan, Table A1.1.
- 78 London Plan, para 7.20
- 79 Core Strategy, policy CE4.
- 80 Kensal Canalside Pre-feasibility study, Kevin Murray Associates, January 2009.
- 81 PPS13, para 76 and Core Strategy Policy CT1
- 82 By Design – urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.27.
- 83 PTALs - Public Transport Accessibility Level
- 84 London Plan, para 4.98
- 85 London Plan, para 4.120
- 86 Core Strategy, para 34.3.5.
- 87 London Plan, para 4.123
- 88 London Plan, para 4.125
- 89 UDP, Policy CD6

## APPENDIX 1

- 90 In considering proposals for riverside development, the Council will also take into account views from the opposite bank of the River Thames (para. 4.2.5). The Borough will raise objection to development in adjoining Boroughs, which adversely affect views from the Chelsea riverside and its environs (CD2).
- 91 Views:– (a) along Chelsea embankment and from the embankment northwards towards the Royal Hospital and its ancillary buildings; (b) along Royal Avenue from King’s Road to the Royal Hospital; and (c) along St. Leonard’s Terrace, Franklins Row, Royal Hospital Road and Ormonde Gate.
- 92 Views:– (a) From the west: through Kynance Mews from Launceston Place; and from Victoria Road along Victoria Grove. (b) From the north: from the axial flight of steps south of the Albert Hall. (c) From the south: from Harrington Road up Queensberry Place; up the east side of Onslow Square towards the Natural History Museum; from the front of Melton Court up Cromwell Place to the tower of the Natural History Museum and the Colcutt Tower; and from Pelham Place and Thurloe Square towards the tower of the Victoria and Albert Museum. (d) From the east: from Princes Gate Mews; and from Fairholt Street and Cheval Place (partly within Westminster).
- 93 Policy CL2h-m, Core Strategy, Schedule of post-submission changes as presented to the planning inspector by the Royal Borough in July 2010.
- 94 CAZ – (Central Activities Zone) effectively regarded as central London. CAZ is promoted as the core location for finance, specialist retail, tourist and cultural activities and uses. It includes parts of Knightsbridge and the museum complex of South Kensington.
- 95 Boroughs are expected to base the designation and management of local views in their development plans on policies 4B.16-4B.18 of the London Plan.
- 96 **Landmark Viewing Corridors:** In cases where a Protected Vista has been identified, a Landmark Viewing Corridor is defined between the Assessment Point and the selected landmark. Front and middle ground assessment areas: Areas in the foreground of Designated Views and in the area between the foreground and a specific landmark (or the general skyline) are to be considered under the Qualitative Visual Assessment Areas of all London Views.

**Landmark lateral assessment areas:** Area, which may be defined on either side of a Landmark Viewing Corridor in order to provide a suitable setting for the landmark and avoid a canyon effect. A development threshold plan is defined as part of the relevant Management Plan, above which developments in this area must be referred to the Mayor and other consultees.

**Landmark background assessment areas:** In cases where a Protected Vista has been defined from an Assessment Point, the area lying beyond the specific landmark is termed Landmark Background Assessment Area. A development threshold plan is defined above which developments in this area must be referred to the Mayor and other consultees.

- 97 It is proposed that 'Toolkits' will become available from the GLA to facilitate the production of AVRs and make the assessment of proposals consistent and straightforward (para.29).

## APPENDIX 2

- 98 You are advised to contact the planning department to confirm that the list is up-to-date and any special information requirements tailored to your proposal.
- 99 The Council may require applicants to arrange for a barrage balloon(s) to confirm the impact of the height of a tall building proposal on its surroundings and the skyline.
- 100 The Council offers a pre-application advice service, which can be accessed by its planning webpage. <http://www.rbkc.gov.uk/planningandconservation/applicationsanddecisions/applicationadvice.aspx>

- 101 Core Strategy, para 34.2.3. The Architecture Appraisal Panel (AAP) is an independent advisory body set up by the Council to review the design quality of significant development projects within or affecting the Royal Borough. Please contact the AAP co-ordinator within the Council's Design Team or visit its planning webpage for further information.

**RBKC - Planning Policy:** Able to help with the general borough-wide interpretation of the Council's planning policy on Building Height in the Royal Borough.

- **Email:** [planningpolicy@rbkc.gov.uk](mailto:planningpolicy@rbkc.gov.uk)
- **Telephone:** 020 7361 2573

**RBKC - Planning Applications:** Able to help with enquiries about site specific planning applications.

- **Email:** [planning.info@rbkc.gov.uk](mailto:planning.info@rbkc.gov.uk)/[planning@rbkc.gov.uk](mailto:planning@rbkc.gov.uk)
- **Telephone:** 020 2361 3012

**RBKC - Conservation and Design (Planning):** Able to help with enquiries relating to the impact on the character of buildings and surrounding areas, especially conservation areas and listed buildings.

- **Email:** [Planning.info@rbkc.gov.uk](mailto:Planning.info@rbkc.gov.uk)/[planning@rbkc.gov.uk](mailto:planning@rbkc.gov.uk)
- **Telephone:** 020 7361 3012

- 102 CABE/EH Guidance, July 2007, para 6.5-6.6.

### APPENDIX 3

- 103 CABE/EH Guidance, 2007, para 4.1.1-11



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