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.³³ 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.³⁴

According to national, metropolitan 4.3 and local planning documents,³⁵ 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.³⁶ 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.³⁷

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.³⁸ 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.³⁹

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.⁴⁰

In order to protect the character and 4.7 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]

This buffer zone is a strategic 4.8 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 finetuning 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 preapplication 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.*⁴¹





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.⁴²

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:⁴³

- panoramas and river prospects ⁴⁴
- townscape views⁴⁵
- linear views⁴⁶
- views of landmarks⁴⁷

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





Figure 06
Protection of strategic and local views



Panoramas

- LP1: Kensington Gardens and Hyde Park⁴⁸
- LP2: Holland Park⁴⁹
- LP3: Royal Hospital⁵⁰
- LP4: Brompton Cemetery⁵¹
- LP5: Kensal Green Cemetery⁵²

River prospects

RP1: River views of Chelsea Embankment and the setting of Chelsea Old Church as well as views from the Thames bridges⁵³

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.

Townscape views

- TV1: View of Kensington Palace from the east across the Round Pond⁵⁴
- 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 ⁵⁵

Views and vistas around Kensington Palace ⁵⁶

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

Views and vistas in and around the Royal Hospital ⁵⁷

- 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



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

- 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.⁶⁰ 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.















Figure 7

Inappropriate and highly sensitive areas for tall buildings