

Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document

CONSULTATION RESPONSES SCHEDULE: TOWNSCAPE & VISUAL ANALYSIS

MARCH 2012

SPD Supporting Evidence Document: Townscape and Visual Analysis

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
476	Tony	Hunter		Townscape and Visual Analysis	View 15	<p>[bold] 2.Townscape and Visual Analysis [end bold]</p> <p>The above points are of particular importance - firstly because what is designated for commercial development will back on to the houses in the Philbeach Gardens conservation area including my house; and secondly because it is adjacent to and could apparently wrap around the Listed St Cuthbert's Church and hall.</p> <p>(a) The photograph in view 15 is taken in the summer and would be very different in winter, when there would be no tree cover. I agree that this is a set piece view as referred to in the "Historical" paragraph. The existing visibility of the Empress State building is already unfortunate and should not be repeated. [bold] I recommend therefore that the final sentence of the Guidance paragraph be changed to "No further buildings should be visible on the skyline along the crescent." Alternatively [end bold], if this cannot be agreed, I think it should be clearly stated (in addition to the wording that is already there) that [bold] such buildings would only be permitted in exceptional circumstances and if essential to a necessary imperative elsewhere on the site [end bold] . Such a building should at the very least be an unfortunate exception not part of a rule.</p>	<p>Change Proposed. Although Empress State is visible in the view (mainly in the winter view) It is recessive and has not inflicted serious harm on the Conservation Area. If other buildings are apparent above the parapet line then the onus would be on the applicant to demonstrate that by position, height, massing and materiality the proposal does not cause significant harm to the conservation area. In this view the setting of the Listed St.Cuthbert's Church is the most important element that must be protected.</p> <p>The wording in the guidelines will be changed to strengthen protection for the setting of the church:</p> <p>Buildings which rise behind the roofline of the crescent could rival the dominance of the listed church and harm its setting if placed in close proximity. Therefore, buildings must be set well away from the church and leave a substantial view of sky between them. By way of their height, scale, massing, silhouette and materials they must not rival the church's dominance in the view and should have even less impact on its setting than the Empress State Building. With regard to their impact on the views from the Conservation Area, buildings visible above the roofline of the street itself could alter the sense of enclosure if not carefully placed and designed. Although the tree canopy filters summer views it cannot screen out views of taller buildings above the parapet during the winter. Any visible buildings should be strongly recessive and not dominate the skyline above the crescent.</p>
477	Tony	Hunter		Townscape and Visual Analysis	View 16	<p>[bold] 2.Townscape and Visual Analysis [end bold]</p> <p>The above points are of particular importance - firstly because what is designated for commercial development will back on to the houses in the Philbeach Gardens conservation area including my house; and secondly because it is adjacent to and could apparently wrap around the Listed St Cuthbert's Church and hall.</p> <p>(b) View 16 is worthy, I would suggest, of a site visit. This is a unique part of Earls Court fully justifying its Grade II Listing. It preserves some of the original village character of Earls Court as a walk towards the church hall makes clear. Under the "Aesthetics" paragraph [bold] I suggest deletion of the word "insensitive" on the penultimate line. Any [end bold] building visible above the roofline would spoil the currently unblemished character of this unique location. [bold] I also suggest that in the guidance the development should not appear above the roofline of either the church or the church hall, and should not impact on the amenity of the hall as a community centre. [end bold] This is a unique part of Earls Court in which its original character has been preserved –</p>	<p>No change necessary</p> <p>The wording does not need to be changed</p> <p>The most important element of this view that should be protected is the setting of the church itself. Philbeach Hall is secondary to the Church in the view, not the focus and it is not as architecturally significant as the church itself. Whilst the Hall forms part of the setting, other buildings on the site could contribute to the setting in the backdrop to the view. The onus would be on the applicant to demonstrate how this could be achieved sensitively.</p> <p>Buildings appearing in the backdrop to the view might be further west into the site not just on the land to the immediate rear of the church and hall.</p>

						the SPD should protect this. That is the minimum that I think requires changed here. I am though rather surprised that any building is being envisaged for construction on this very narrow site wrapping around the church and its hall. My view is that any building is likely to spoil this unique corner of Earls Court; and that no such building should be envisaged by the SPD. I think this would best be confirmed by a site visit and would be very happy to meet the Councils' representatives there.	
1570	Claire	Craig	English Heritage	Townscape and Visual Analysis		English Heritage's guidance document The Setting of Heritage Assets (October, 2011) contains our recommended methodology for the application of PPS 5 in relation to impacts such as new development within views from conservation areas. In accordance with our Setting Guidance, we consider that the current methodology for the Townscape and Visual Analysis report (TVA) would benefit from looking more closely at the contribution of the views from the relevant conservation areas and Registered Parks and Gardens of Historic Interest to the significance of those conservation areas and parks and gardens.	No change necessary The wording does not need to be changed. The methodology employed for considering the impact on each view from Conservation areas and Registered Parks and Gardens of Historic Interest includes an assessment of the aesthetic and historic significance of the view. Conservation Area Proposals Statements from both Borough's were drawn on to support the assessments. We believe the methodology is consistent with PPS5.
1571	Claire	Craig	English Heritage	Townscape and Visual Analysis		English Heritage has taken this approach into consideration when reviewing the guidelines proposed for each of the views contained in the TVA. Consequently, we consider that many of the guideline paragraphs require strengthening for compliance with PPS 5. Regrettably we have not had sufficient time available to provide an exhaustive listing of our assessment of each view. Consequently, we have sought to identify examples of our concerns and request that these recommendations be cross-referenced to heritage assets with similar qualities. In addition, we have not been able to provide comment on views such as those from Kensington Gardens that do have an accompanying photograph in the document and we are obliged to take a precautionary position in relation those.	No change necessary The wording does not need to be changed. The methodology employed for considering the impact on each view from Conservation areas and Registered Parks and Gardens of Historic Interest includes an assessment of the aesthetic and historic significance of the view. Conservation Area Proposals Statements from both Borough's were drawn on to support the assessments. We believe the methodology is consistent with PPS5. The resulting guidelines are based on a thorough assessment of the significance of the view and the appropriate level of protection required for the historic asset. Precautionary position on views without photographs noted.
1572	Claire	Craig	English Heritage	Townscape and Visual Analysis		- [bold] View 9 Fulham Palace Gardens [end bold] - the sense of enclosure is significant to the ability to appreciate the Grade I listed Palace environs and it would be our preference that there be no further intrusion into the view provided;	No change necessary. The opportunity area is far distant from Fulham Palace, the Empress State Building which is heavily screened is very recessive in the view at this distance and is not intrusive. New buildings which are equally recessive are not expected to harm the view and therefore the guideline does not need to be changed.
1573	Claire	Craig	English Heritage	Townscape and Visual Analysis		- [bold] View 14 Longridge Road [not bold] - the identification of the pleasing symmetry in this view and the absence of intrusion from buildings beyond the street suggests that this part of the experience plays an important part in the significance of the conservation area. This could be verified by reviewing any character or conservation area appraisal or management plan for the Royal Borough of Kensington and Chelsea's (RBKC) Nevern Square Conservation Area. On the face of it, we consider that using the wording from the guidelines for View 25 Harrington Gardens – no buildings on the opportunity area should be visible above the rooflines of any of the buildings in this view;	No change necessary. In our assessment the view from Harrington Gardens demands more protection as the highly articulated roofline is comprised of many Listed Buildings. The quality of the view is exceptional. In view 14 we do not believe that the same level of protection is necessary as buildings on the site may enhance the view if recessive. The Guideline does not need to be changed.
1574	Claire	Craig	English Heritage	Townscape and Visual		- [bold] View 15 Philbeach Gardens [end bold] - as per View 14 above but relating to conservation area appraisals and management plans for	No change necessary. In our assessment the view from Harrington Gardens demands more protection as the highly articulated roofline is comprised of many

				Analysis		the Philbeach Conservation Area;	<p>Listed Buildings. The quality of the view is exceptional. In view 15 we do not believe that the same level of protection is necessary as buildings on the site may enhance the view if carefully designed, recessive and set back from St.Cuthberts Church. We do however, agree that the guidance should be strengthened and the wording will be changed to:</p> <p>Buildings which rise behind the roofline of the crescent could rival the dominance of the listed church and harm its setting if placed in close proximity. Therefore, buildings must be set well away from the church and leave a substantial view of sky between them. By way of their height, scale, massing, silhouette and materials they must not rival the church's dominance in the view and should have even less impact on its setting than the Empress State Building. With regard to their impact on the views from the Conservation Area, buildings visible above the roofline of the street itself could alter the sense of enclosure if not carefully placed and designed. Although the tree canopy filters summer views it cannot screen out views of taller buildings above the parapet during the winter. Any visible buildings should be strongly recessive and not dominate the skyline above the crescent.</p>
1575	Claire	Craig	English Heritage	Townscape and Visual Analysis		- [bold] View 16 St Cuthbert's Church, Philbeach Gardens [end bold] - as above;	<p>No change necessary. In our assessment the view from Harrington Gardens demands more protection as the highly articulated roofline is comprised of many Listed Buildings. The quality of the view is exceptional. In view 16 we do not believe that the same level of protection is necessary as buildings on the site may enhance the view if carefully designed to work with the roofline of Philbeach Hall and set back from St.Cuthberts Church. The Guideline does not need to be changed.</p>
1576	Claire	Craig	English Heritage	Townscape and Visual Analysis		- [bold] View 17c Nevern Square south east corner [end bold] - as per View 14 above;	<p>No change necessary. In our assessment the view from Harrington Gardens demands more protection as the highly articulated roofline is comprised of many Listed Buildings. The quality of the view is exceptional. In view 17c we do not believe that the same level of protection is necessary as buildings on the site may enhance the view if recessive and do not compete in scale with existing buildings in the view. The Guideline does not need to be changed.</p>
1577	Claire	Craig	English Heritage	Townscape and Visual Analysis		- [bold] View 28 Eardley Crescent [end bold] - as per View 15 above;	<p>No change necessary. In our assessment the view from Harrington Gardens demands more protection as the highly articulated roofline is comprised of many Listed Buildings. The quality of the view is exceptional. In view 28 we do not believe that the same level of protection is necessary as buildings on the site may enhance the view if recessive. We do however, agree that the guidance should be strengthened and the wording will be changed to:</p> <p>Any new buildings that are visible above the roofline of Eardley Crescent should be designed so as to be strongly recessive in the view, less prominent than EC1 and barely noticeable amongst the dormer windows, roofs and chimneys.</p>
1578	Claire	Craig	English Heritage	Townscape and Visual Analysis		- [bold underline] Brompton Cemetery Views [bold underline]	<p>English Heritage is concerned at the very minimal analysis of the listed monuments within Brompton Cemetery in relation to the views contained in the TVA. We consider that where individual listed monuments and structures are identifiable within the view they should form part of the analysis of significance. Character or conservation area appraisals and management plans prepared by RBKC and the Royal Parks can be instrumental in undertaking this work and there is no evidence that these have been drawn upon. We would also draw your attention to the fact that a further 21 monuments have been recommended for inclusion on the statutory list as either Grade II or Grade II*.</p> <p>Change proposed. The text will be revised to include individual listed monuments where they are identifiable in the view. We note that 21 monuments have been recommended for inclusion on the statutory list.</p>

1579	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View 31 Eastern circular approach adjacent to Mortuary Chapel [end bold] - English Heritage does not consider that a sense of enclosure is essential for the western side of the cemetery. We accept that the western side of the cemetery will be enclosed by development but are of the opinion that the level of enclosure does not necessitate additional buildings that would be visible in this view. There may be a case for improving the existing view if the improved integration of the Empress Building into the surrounding townscape could be achieved;	No change necessary. Whilst the The Royal Borough of Kensington and Chelsea's Conservation Area proposals Statement for Brompton Cemetery draws attention to the weak enclosure of the west side of the cemetery. The wording will be changed to: With the removal of EC1 there is an opportunity to improve the setting of the cemetery in this view and to improve the backdrop to the western arcade and bell tower. Lower buildings on the site of EC1 could be less intrusive in the skyline and could restore the prominence of the bell tower in the horizon view. Any visible new buildings beyond the cemetery boundary could enhance the view if they were to incorporate slender and vertical proportions in response to the many vertical elements within the cemetery. Gaps between buildings and glimpses of sky between them will also be necessary to break up the massing particularly where positioned close to the Empress State Building.
1580	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View 32 centre of the Great Circle [end bold] - as per View 31 above;	No change necessary. The Royal Borough of Kensington and Chelsea's Conservation Area proposals Statement for Brompton Cemetery draws attention to the weak enclosure of the west side of the cemetery. The guidelines do not need to be changed
1581	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View 35 Along Long Avenue [end bold] - as per View 31 above;	No change necessary. The Royal Borough of Kensington and Chelsea's Conservation Area proposals Statement for Brompton Cemetery draws attention to the weak enclosure of the west side of the cemetery. As the view is so weakly enclosed, buildings of even modest heights will be visible, however this may be beneficial if it provides containment for the west side of the cemetery. The guidelines are flexible enough to allow the applicant to demonstrate the appropriate degree of enclosure. The guidelines do not need to be changed.
1582	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View S18 Brompton Cemetery inside the North Entrance [end bold] - as above;	No change necessary. The Royal Borough of Kensington and Chelsea's Conservation Area proposals Statement for Brompton Cemetery draws attention to the weak enclosure of the west side of the cemetery. As the view is so weakly enclosed buildings of even modest heights will be visible, however this may be beneficial if it provides containment for the west side of the cemetery. The guidelines are flexible enough to allow the applicant to demonstrate the appropriate degree of enclosure. The guidelines do not need to be changed.
1583	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View S19 Brompton Cemetery north east edge [end bold] - as above;	No change necessary. The Royal Borough of Kensington and Chelsea's Conservation Area proposals Statement for Brompton Cemetery draws attention to the weak enclosure of the west side of the cemetery. As the view is so weakly enclosed buildings of even modest heights will be visible, however this may be beneficial if it provides containment for the west side of the cemetery. The guidelines are flexible enough to allow the applicant to demonstrate the appropriate degree of enclosure. The guidelines do not need to be changed.
1584	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold]View 46 Charleville Road [end bold] - as per View 14 but relating to Character Appraisals for the London Borough of Hammersmith and Fulham's (LBHF) Barons Court Conservation Area;	No change necessary. In our assessment the view from Harrington Gardens demands more protection as the highly articulated roofline is comprised of many Listed Buildings. The quality of the view is exceptional. In view 46 we do not believe that the same level of protection is necessary as buildings on the site may enhance the view if recessive. The Barons Court Conservation Area Character Profile was drawn on in the production of the townscape analysis for this view. The Guideline does not need to be changed.
1585	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View A145 Fairholme Road [end bold] - we consider that no buildings on the opportunity area should be visible above the rooflines of any of the buildings in this view;	No change necessary. Buildings visible above the roofline may contribute to the view and the Guidelines demonstrate how this may be achieved whilst preserving the key elements of the view.
1586	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View A146 Castletown Road [end bold] - as above;	No change necessary. Buildings visible above the roofline may contribute to the view and the Guidelines demonstrate how this may be achieved whilst preserving the key elements of the view.
1587	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View A147 Barton Road [end bold] - as above;	No change necessary. Buildings visible above the roofline may contribute to the view and the Guidelines demonstrate how this may be achieved whilst preserving the key elements of the view.

1588	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View 67 Lillie Road [end bold] - as above;	No change necessary. Buildings visible above the roofline may contribute to the view and the Guidelines demonstrate how this may be achieved whilst preserving the key elements of the view.
1589	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View S7 Eardley Crescent [end bold] - as above;	Change proposed. The guidance will be strengthened and changed to: New buildings visible at the end of the crescent should be no higher than the roofline of the crescent. Any buildings visible above the roofline of Eardley Crescent should be strongly recessive in the view so as to allow the roofline of the Crescent to remain the defining feature against the sky view.
1590	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View S10 Redcliffe Square from the Little Boltons [end bold] - as above;	No change necessary. Buildings visible above the roofline may contribute to the view and the Guidelines demonstrate how this may be achieved whilst preserving the key elements of the view.
1591	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View S12 Redcliffe Square from the junction with Redcliffe Gardens [end bold] - as above; and	No change necessary. Buildings visible above the roofline may contribute to the view and the Guidelines demonstrate how this may be achieved whilst preserving the key elements of the view.
1592	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View S23A Sedlescombe Road, northern side [end bold] - as above.	No change necessary. Buildings visible above the roofline may contribute to the view and the Guidelines demonstrate how this may be achieved whilst preserving the key elements of the view.
1593	Claire	Craig	English Heritage	Townscape and Visual Analysis	English Heritage also considers that the SPD would greatly benefit from assessing and modelling the collective impact of these amended guidelines within the TVA on the development potential of the opportunity area. It is our opinion that this additional level of analysis should reveal where tall building would be appropriate within the OA and to what scale. Also it could assist the development of more detailed design policies for the SPD in accordance with recommended approach in the PPS 5 Practice Guide at paragraph 44.	No change necessary. The authorities consider that, as the SPD is intended to supplement existing policy, the primary role of the Urban Form Strategy is to establish a framework of Key Principles and Key Objectives against which any planning application(s) for the OA could be assessed. It is not intended to provide a definitive masterplan with a fixed spatial solution, but rather to provide planning guidance for the OA that supplements the requirements of the Boroughs' Core Strategies and the Mayor's London Plan. To determine where tall buildings would be appropriate would require a masterplan approach so that precise building locations can be tested. There could be an unlimited number of locations suitable for taller buildings on their own or distributed in groups around the site. The complexity of predicting where these may be located and to what scale would not make it feasible to produce comprehensive guidance that could inform the TVA.