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

CONSULTATION RESPONSES SCHEDULE: TOWNSCAPE & VISUAL ANALYSIS



SPD Supporting Evidence Document: Townscape and Visual Analysis

[Bold] 2.Townscape and Visual Analysis [end bold] The above points are of particular importance - firstly because what is designated for commercial development will back on to the houses in the Philibeach 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. (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 sell piece view as referred to in the "Historical" paragraph. The existing visibility of the Empress State building is atreaghly read body in the commercial three states are should not be repeated. [bod] it recommend therefore that the first shelfness of the church and harm its settling if placed in close prox visible on the skyline along the Empress State building is a treepy the dould, this cannot be agreed, I think it should be clearly stated (in addition to the wording that is already there) that [bod] such building should and to be repeated. [bod] it recommend therefore that the first shelfness of the commercial shelf will be commercial thready the commercial thready that the commercial thready the commercial thready that the commercial thready that the commercial thready thready the commercial thready thready the commercial thready				Chapter	Section		
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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. (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 demonstrate how this could be achieved sensitively.	476 Tony	Hunter		and Visual	View 15	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.	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.
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- [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; Claire Craig Heritage Analysis Power 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 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 English Townscape English Townscape Figlish Figlish Townscape Figlish Figlish Townscape Figlish Townscape							T
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	<u>157</u> 3	Claire	Craig				
1574 Claire Craig Heritage and Visual but relating to conservation area appraisals and management plans for demands more protection as the highly articulated roofline is comprised of mar				English	Townscape	- [bold] View 15 Philbeach Gardens [end bold] - as per View 14 above	No change necessary. In our assessment the view from Harrington Gardens

		1	1	Analysis	the Philbeach Conservation Area;	Listed Buildings. The quality of the view is exceptional. In view 15 we do not
				Allalysis	the i imbeach conservation Area,	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:
						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.
						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
				Townscape		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
1575	Claire	Craig	English Heritage	and Visual Analysis	- [bold] View 16 St Cuthbert's Church, Philbeach Gardens [end bold] - as above;	Hall and set back from St.Cuthberts Church. The Guideline does not need to be changed.
						No change necessary. In our assessment the view from Harrington Gardens demands more protection as the highly articulated roofline is comprised of many
			Frantiala	Townscape	[bald] View 17a Nevers Covers couth post seven ford bold] as you	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
1576	Claire	Craig	English Heritage	and Visual Analysis	- [bold] View 17c Nevern Square south east corner [end bold] - as per View 14 above;	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. 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:
1577	Claire	Croig	English Heritage	Townscape and Visual Analysis	- [bold] View 28 Eardley Crescent [end bold] - as per View 15 above;	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.
1577	Claire	Craig	пенкаде	Analysis	- [bold underline] Brompton Cemetery Views [bold underline]	and barely noticeable amongst the domer windows, roots and chillineys.
					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	
			Face Park	Townscape	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	Change proposed. The text will be revised to include individual listed monuments
1578	Claire	Craig	English Heritage	and Visual Analysis	that a further 21 monuments have been recommended for inclusion on the statutory list as either Grade II or Grade II*.	where they are identifiable in the view. We note that 21 monuments have been recommended for inclusion on the statutory list.

						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:
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;	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.
	Claire		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.
	Claire		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.
	Claire		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.
						Change proposed. The guidance will be strengthened and changed to:
1589	Claire	Craig	English Heritage	Townscape and Visual Analysis	- [bold] View S7 Eardley Crescent [end bold] - as above;	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.
						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.
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.	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.