

ROYAL BOROUGH KENSINGTON & CHELSEA
URBAN DESIGN STRATEGY - DRAFT SPD

Background Report 03

High Building Strategy

JULY 2006

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THE ROYAL
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KENSINGTON
AND CHELSEA





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INTRODUCTION



In Autumn 2005 the Royal Borough of Kensington and Chelsea commissioned Urban Initiatives to prepare a Draft

Supplementary Planning Document (SPD) - Urban Design Strategy for the Royal Borough. As part of this work a series of reports were produced which led to the preparation of the Draft SPD.

These reports were summarised into three Background Reports that provide with detailed guidance and additional information as background to the SPD document.

This report is Background Report 03

- High Building Strategy and summarises working stage 3.

Purpose of the report

The purpose of the report is to provide the basis of policy and guidelines for the planning and development of high buildings in the Royal Borough of Kensington and Chelsea.

Methodology and structure of the report

The study methodology comprises an understanding of the context, a High Building Strategy and the formulation of policy recommendations.

In order to provide an understanding of the context the following was carried out:

A review of the existing national, metropolitan and local policy

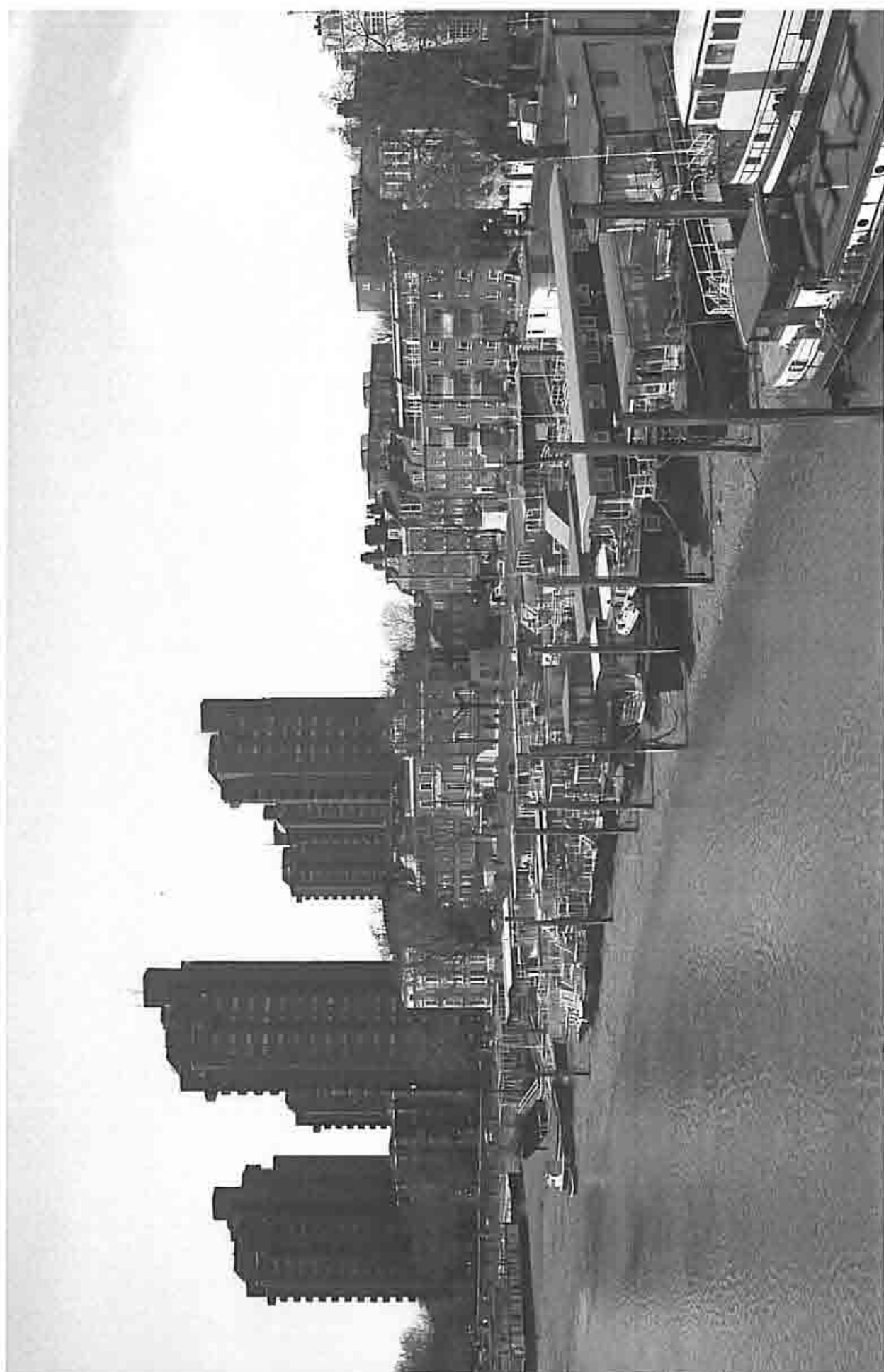
A study of the image and character of the Royal Borough of Kensington and Chelsea

Development of methodologies for location of tall buildings in the specific context of the Royal Borough of Kensington and Chelsea

Recommendations include:

Boroughwide policy and assessment criteria

Specific area guidelines



Aspects of tall buildings

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

Landmarks are easy to see and recognise, provide geographical or cultural orientation points and act as carriers of meaning. Landmarks can consist of geographical elements as hills, trees or waterways or of high structures, such as spires and towers, but also of tall buildings. Tall buildings can act as landmarks through a stand alone development or through clusters, a collection of high buildings within a compact area or precinct.

Arguments for high buildings

Tall buildings can mark strategic spots, such as important transport nodes, gateways, end points of significant axial views or relevant inflection points along waterways. Depending on their size and location tall buildings can perform as landmarks. Landmarks attract people, help orientation and may contribute to a local identity.

High density developments – among them tall buildings – maximize the potential of sites. High density developments work best when located in and around town centres and near to major transport interchanges. Clustering often occurs at points of intense commercial pressure and/or accessibility. Nevertheless, tall buildings are only one possible model for high density. Densities are linked to building height, form and footprint of development. Low rise typologies such as terraces and mansion flats can as much as towers achieve high densities.

Arguments against high buildings

Tall buildings are likely to have a greater impact on their context 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 a negative impact on micro-climates in terms of wind, sun and reflection. Tall buildings can also harm the network of public spaces. Public spaces are often weakly defined and lack enclosure, legibility and passive supervision. Weakly defined spaces make it difficult to orientate and personal security fears deter non-residents from passing through tall building estates.

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.

London has a history of building height regulation. Until 1956 there was a height restriction in central London of 100 foot controlled by the London Building Acts of 1888 and 1894 which restricted building heights to the width of the street or the height of a fireman's ladder plus a two-storey roof (exempting church steeples).

Definition of tall buildings

The London Plan defines tall buildings as 'buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline' (para. 4.54). Tall buildings are taller than the overall building height in an area. Thus, a six storey building might be a tall building in a predominantly two-storey suburban area, but of a common height in a metropolitan centre. Therefore, high buildings must be considered in relation to their local and wider context.

¹ Spiro Kostal, *The City Shaped*, London 2001, p. 296.





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

2.1 NATIONAL POLICIES

Planning Policy Guidance Notes (PPGs) and their replacements Planning Policy Statements (PPSs) are prepared by the government to provide guidance to local authorities and others on planning policy and the operation of the planning system. Local authorities must take their contents into account in preparing their development plans. The guidance may also be relevant to decisions on individual planning applications and appeals.

PPS1

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 protect and enhance 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).**

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)

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 objectives of good urban design to create attractive and sustainable places. The guidance advises that scale, massing and height of proposed development should be considered in relation to that of adjoining buildings, the topography, the general patterns of heights in the area and 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.**² 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.³

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.⁴

PPG13

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).

PPG15

Government guidance on the protection of historic buildings and conservation areas can be particularly pertinent to proposals for tall buildings in historic environments. The PPG encourages local authorities to ensure that any new development accords with the area's special architectural and historic interest (para. 4.16). Local planning authorities are required under section 67 of the Act to publish a notice of all applications they receive for planning permission for any development, which, in their opinion, affects the setting of a listed building. PPG15 highlights that where a listed building forms an important visual element in a street, it would probably be right to regard any development in the street as being within the setting of the building (para. 2.17). It further underlines that **a proposed high or bulky building might also affect the setting of a listed building some distance away, or alter views of a historic skyline.**

PPG15 underlines that major new transport infrastructure developments can have an especially wide-ranging impact on the historic environment, not just visually and physically, but indirectly, for example, by altering patterns of movement or commerce and generating new development pressures or opportunities in historic areas. Local highway and planning authorities should take great care to avoid or minimise impacts on the various elements of the historic environment and their settings (para. 5.2).

GUIDANCE ON TALL BUILDINGS (ENGLISH HERITAGE/CABE)

This guidance sets out the criteria that both English Heritage and CABE 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 possible (para. 2.4).

In identifying appropriate and non-appropriate locations for tall buildings, local authorities should carry out a detailed urban design study (para. 2.6). This study should identify those elements that create local character and other important features and constraints, including streetscape, scale, height, urban grain, natural topography, significant views of skylines, landmark buildings and areas and their settings, including backdrops, and important local views, prospects and panoramas. Having identified the constraints and opportunities through an urban design study, specific policies should be included in local development plans (or, in future, development plan documents) **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. 2.6).**

Applicants seeking planning permission for tall buildings should ensure that the proposal will conserve, or not damage or detract from (para. 4.6 iii):

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.

In many cases the argument for high-density development has been used to support proposals for tall buildings. The guidance, however, makes it clear that **tall buildings are only one possible model for high density development (para. 4.5).**

2.2 METROPOLITAN POLICY CONTEXT

LONDON PLAN

The London Plan provides the Londonwide 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 asks boroughs to ensure that developments among other principles maximize the potential of sites; are sustainable, durable and adaptable; respect local context, character and communities; and respect, protect and enhance London's built heritage (para. 4.36). Policy 4B.7 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.**

Specific policies on tall buildings are contained in Policy 4B.8 and Policy 4B.9. Another pertinent policy regarding tall buildings is the London View Protection Framework (Policy 4B.15, Policy 4B.16, Policy 4B.17), which is complemented by the London View Management Framework Draft SPG.

Policy 4B.8 Tall buildings – location

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 UDPs. In doing so Boroughs should clearly explain what aspects of local character could be affected and not impose unsubstantiated borough-wide height restrictions. The Plan also makes it clear that compact city and intensive development does not necessarily imply high-rise buildings and that London has achieved some of its highest residential densities in relatively low-rise areas (para. 4.55).

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

According to this policy large-scale buildings – including tall buildings – should be of the highest quality design and among others:

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

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.

London View Protection Framework

Since 1991, the framework for protecting strategically important views in London has been set by Regional Planning Guidance (RPG) 3 Annex A: 'Supplementary Guidance for London on the Protection of Strategic Views', which designates 10 strategic views, 8 of St Paul's Cathedral and 2 of the Palace of Westminster. The Royal Borough of Kensington and Chelsea is crossed by one Protected Vista, St Paul's Cathedral from King Henry's Mound in Richmond. RPG3A continues to be the relevant planning guidance for the protection of strategic views.

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.15 - 4B.17] aimed at protecting strategic views complemented by a draft SPG, which provides further guidance on how these policies operate. The Mayor intends to request the government to withdraw RPG3A to be replaced by the SPG and London Plan policies, which will become the statutory framework for strategic view protection in London. Borough development plans should be in general conformity with the London Plan.

Policies 4B.15 - 4B.17

London Plan Policy 4B.15 land its associated table 4B.2) designates 26 strategically important views of four types: London panoramas, river prospects, townscape views and linear views.³ The Mayor will keep the list of designated views under review. The policy indicates that views will only be considered for designation where:⁴

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.

Policy 4B.16 indicates that the Mayor will prepare 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.

The management plans should 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 should also clarify appropriate development height thresholds and protect backgrounds that give a context to landmarks. Policy 4B.16 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.

Policy 4B.17 provides guidance on assessing the impact of a proposed development on designated views. It identifies four assessment areas⁵:

landmark viewing corridors,

front and middle ground assessment areas,

landmark lateral assessment areas,

landmark background assessment areas.

Accordingly boroughs should refuse or direct refusal of 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 DRAFT SPG, APRIL 2005

The draft 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.

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. 33). 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'.⁸ 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. 28).

The qualities of some significant views on important landmarks are such that they require geometric protection (para. 31). 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 BLUE RIBBON NETWORK (LONDON PLAN)

The Blue Ribbon Network is part of the London Plan and sets out policies to enhance and protect the special character of the Thames area. It replaces the London parts of RPG3b/9b (Strategic Planning Guidance for the River Thames) and extends policy to cover the whole network of London's waterways rather than just the Thames including the canal network and the other tributaries and streams (para. 4.72).

The policy highlights that 'views to and from the waterways are especially significant because the openness of water spaces allows for relatively long-distance views' (para. 4.123). Relevant boroughs, in reviewing their UDPs, must designate a Thames Policy Area (Policy 4C.25) and prepare detailed appraisals considering among others development sites and views of particular sensitivity and importance (Policy 4C.26). For all major development proposals within the Blue Ribbon Network developers should prepare design statements to cover the impact on river prospects and any other locally designated view (Policy 4C.21). 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 also recognises that there are a number of adverse effects that tall buildings can have when located adjacent to water spaces (para. 4.125), which include overshadowing, wind turbulence and creating a visual canyon.

2.3 UNITARY DEVELOPMENT PLAN (2002)

According to Policy 4C.20 Boroughs should seek a high quality of design for all waterside development. The policy underlines that all development, including tall buildings, should reflect local character, meet general principles of good urban design and improve the quality of the built environment. Development should 'relate successfully' in terms of scale, materials, colour and richness of detail, not only to the direct neighbours but also to buildings on the opposite bank and those seen in the same context with the River Prospects or other locally identified views.⁹

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 Borough (STRAT 1) and furthermore seeks an increase in residential provision (STRAT 2). The Borough supports London's economic growth in those parts that are recognised as having capacity for additional commercial or industrial activity (STRAT 3) and that are or will be well served by public transport (STRAT 5, STRAT 7). Finally, sustainable development is promoted to conserve and enhance the environmental quality of the Royal Borough (STRAT 8).

The UDP sets out 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 reflect the traditional urban form of the Borough by preserving local plot widths, building lines, rootscape and open space (CD 28). 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). The Borough will also oppose any

new building 'which would significantly exceed the height of neighbouring buildings and which would harm the skyline' (CD37).

The UDP requires the character or appearance of each conservation area¹⁰ 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, rootscape, 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).

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 (STRAT 13) and has designated the whole of the Thames within the Borough boundaries as a conservation area.¹¹

In line with the London Plan the UDP also protects London's skyline and strategic views:

To protect the strategic view of St. Paul's Cathedral from King Henry's Mound (STRAT 12, 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).¹² 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)¹³ 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)¹⁴, 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 to 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).

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 (CD63). The impact of new development will be considered on the foreground, background and lateral area of the protected view (para. 4.3.30).

FOOTNOTES

- 2 By Design – Urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.21.
- 3 By Design – Urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.23.
- 4 By Design – Urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.27.
- 5 London panoramas: Elevated panoramic views of central London and its suburbs from important public open spaces
River prospects: Broad prospects from the River Thames
Townscape views: Views which focus on architectural and/or culturally significant groups of buildings which can be enjoyed from well managed public spaces
Linear views: Views on key landmarks (Buckingham Palace and St Paul's Cathedral)
- 6 Boroughs should base the designation and management of local views in their UDPs on Policies 4B.15-4B.17.
- 7 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 for 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.
- 8 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).
- 9 The policy advises that juxtaposition of buildings should take into account river meanders and the impact these can have on how buildings may be seen together
- 10 There are currently 35 conservation areas in the Kensington and Chelsea, covering about 70% of the Borough (para. 4.5.11)
- 11 The Thames Strategy – Kew to Chelsea – is currently in preparation and will consider its adoption as supplementary planning guidance.
- 12 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)
- 13 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.
- 14 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 Colcut Tower; and from Pelham Place and Thurloe Square towards the lower of the Victoria and Albert Museum. (d) From the east: from Princes Gate Mews; and from Fairholt Street and Cheval Place (partly within Westminster).



03

BUILDING SCALE AND HEIGHT IN THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA



The Royal Borough of Kensington and Chelsea is characterised by a fine grain historic street pattern with an outstanding building stock of Georgian and Victorian town houses. Only along main corridors and barriers – the Grand Union Canal in the north, the West London Line in the west and the River Thames in the south – is the urban form more diverse and fragmented.

The majority of areas in the Borough are predominantly residential. However, pockets of office use can be found in the vicinity of public transport nodes, whilst other employment zones are located along the railway lines. The retail sector in the Borough is significantly developed with a number of well-established shopping centres and high streets. The Borough also contains a variety of hotel, tourism, cultural, educational, health and sport facilities.

The predominant development form is the urban street block, with buildings following the perimeter of the block.¹⁵ This typical arrangement creates a clear distinction between external public and internal semi-private and private spaces. In many parts of the Royal Borough quarters consist of medium to small sized urban blocks, whilst blocks themselves are subdivided into fine grain development plots. In contrast, most areas along the western and northern edge are of a coarse urban grain. These places have a lower permeability and are affected by severance.

Throughout large parts of the Borough, the scale of development shows little variation. The plot width of a typical unit ranges between 5-7.5 m for terraced and town houses, and 12-18 m for walk-up apartment buildings. Depending on building height, these very compact development patterns result in medium to high density areas. These can be found especially in the central area of the Borough including parts of Notting Hill, Kensington, South Kensington and Hans Town. All remaining parts range from lower to medium density.

The urban 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 can be straight or curved as in the many crescents in the Borough, 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 their direct relation to the street, regular and frequent openings and 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.

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



Georgian and Victorian terraces are the predominant development form in the Royal Borough

Building Heights

With the exception of a few clusters of tall buildings along main corridors, along barriers or around central nodes, the majority of the Borough has a relatively homogenous and level roofscape.

Building heights are relatively consistent within each quarter. Average heights range from 2-3 storey terraces in North Kensington to 3-5 storey Georgian and Victorian terraces and town houses and up to 8 storey Edwardian Mansion Blocks in the Ladbroke Grove Area, Notting Hill, Holland Park Area, South Kensington and Chelsea. A single building height often prevails, especially within historical residential estates, and only key buildings stand out. Eaves or parapets lines are continuous and 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 2-3 storeys. The homogenous height, scale and architectural treatment of adjacent development ensembles ensure that streets appear balanced and coherent.



Building heights are relatively consistent within each quarter of the Borough

Tall Buildings and Clusters

Building plots along major 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, Kings Road and parts of Sloane Avenue. The tall building survey¹⁶ indicates that developments along these routes reach heights between 7-9 and 10-14 storeys. Many of these buildings can be defined as 'Ambiguous Landmark Buildings', whose height-ratio is ambiguous having an intrusive impact on the context (see also 4.3.2.2 Landmarks, p. 50 of this report).



Notting Hill Gate



World's End Estate



Trellick Tower

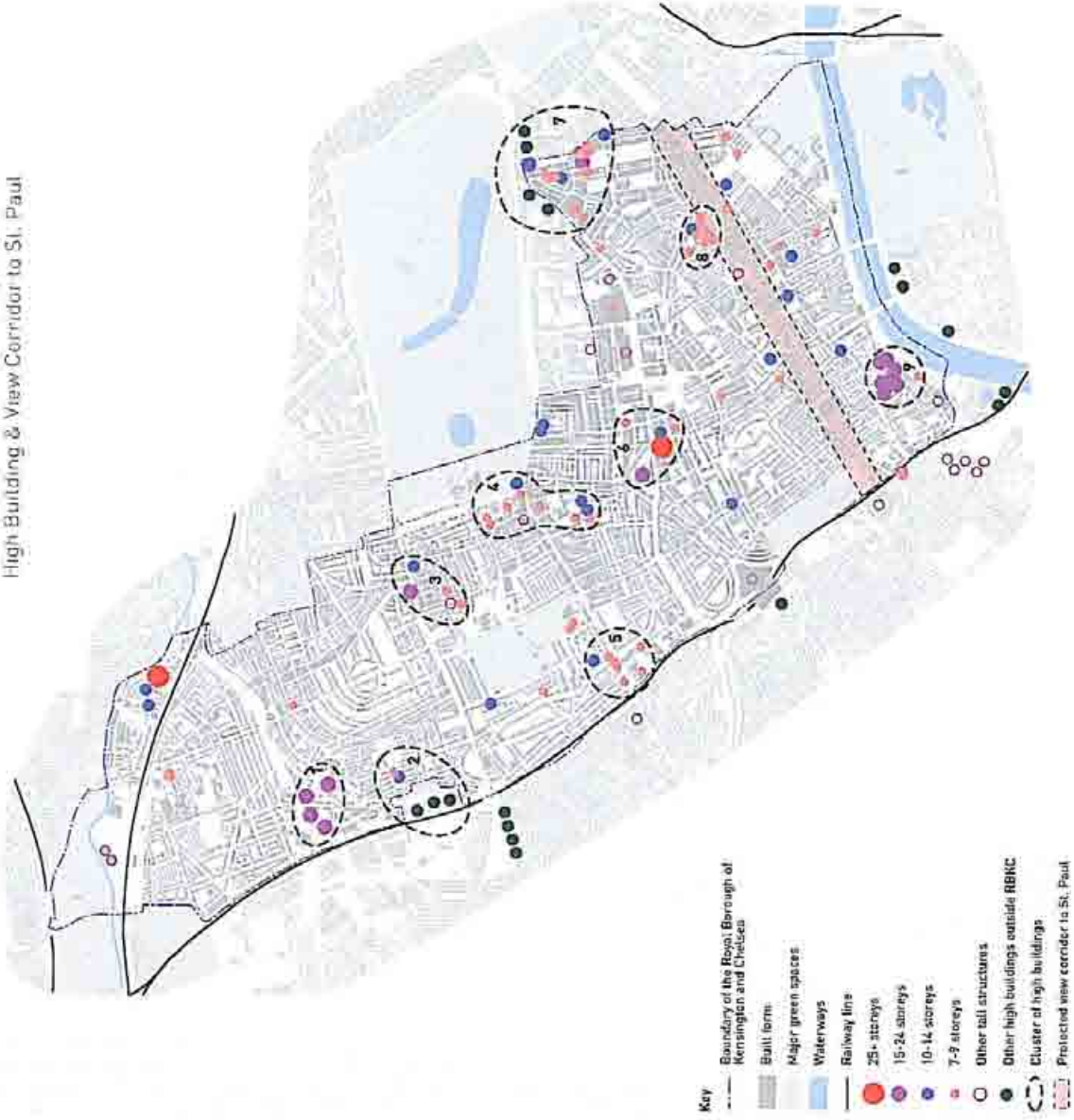
The Borough also accommodates 'District Landmarks' and 'Metropolitan Landmarks', which have a dominant effect on their immediate and wider surroundings (see also 4.3.2.2 Landmarks, p. 50 of this report).

Besides a hotel and a few office towers, the majority of these buildings are part of post-war social housing developments and have a generally negative connotation. With the exception of a few single developments (particular along Kings Road) landmarks in the Borough tend to cluster in 10 groups:

- 1) Lalmer Road Estate
- 2) West Cross Route Estate (to Hammersmith and Fulham)
- 3) Notting Hill Gate
- 4) Kensington High Street East
- 5) Kensington High Street West
- 6) Cromwell Road
- 7) Knightsbridge
- 8) Sloane Avenue
- 9) World's End Estate

The Borough accommodates two clusters of tall towers in the range of 15-24 storeys. The first group comprises five stand alone towers in the vicinity of Lalmer Road Tube Station in North Kensington. The second group includes seven interlinked towers, which are part of the World's End Estate in Southwest Chelsea. A third group of towers is a residential estate situated east of West Cross Route. Although part of the neighbouring Borough of Hammersmith and Fulham, these towers have a strong impact on the skyline of the

Figure 1 – Urban Design Analysis
High Building & View Corridor to St. Paul



Royal Borough. None of the three clusters relates to its neighbours in terms of scale, height, pattern and character. Furthermore, they overshadow existing adjoining buildings and amenity spaces and make other residents feel that they are being overlooked.

These three clusters of tall towers not only have a negative impact on immediate adjoining buildings, they 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 South, the clusters appear out of place disrupting the urban pattern, scale, roofscape and building line of the homogenous Georgian and Victorian quarters.

Only two buildings in the Borough have more than 25 storeys. The first is the widely visible residential Trellick Tower by the Architect Erno Goldfinger. This listed building is an iconic tower, which assists orientation and contributes to the identity of the area. The second tower is the Holiday Inn Kensington Forum Hotel Tower in Cromwell Road close to Gloucester Road Tube station. This bulky building appears out of scale and does not relate to its immediate context. The slightly lower development across Cromwell Road ('Point West') seems similarly out of place.

Spires and Towers

A number of other tall structures equally determine the skyline of the Royal Borough. Among others are the spires of Kensington Church, Brompton Oratory, the towers of the Natural History Museum and the Imperial College (City of Westminster), Earl's Court Exhibition Hall and Olympia Exhibition Hall (Hammersmith and Fulham), Chelsea Football Club Stadium (Hammersmith and Fulham) and the Gasholders in North Kensington.

Most of the spires and towers are listed and form important landmarks of local and metropolitan importance. Due 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 social and civic meaning.



Spires relate to historic quarters

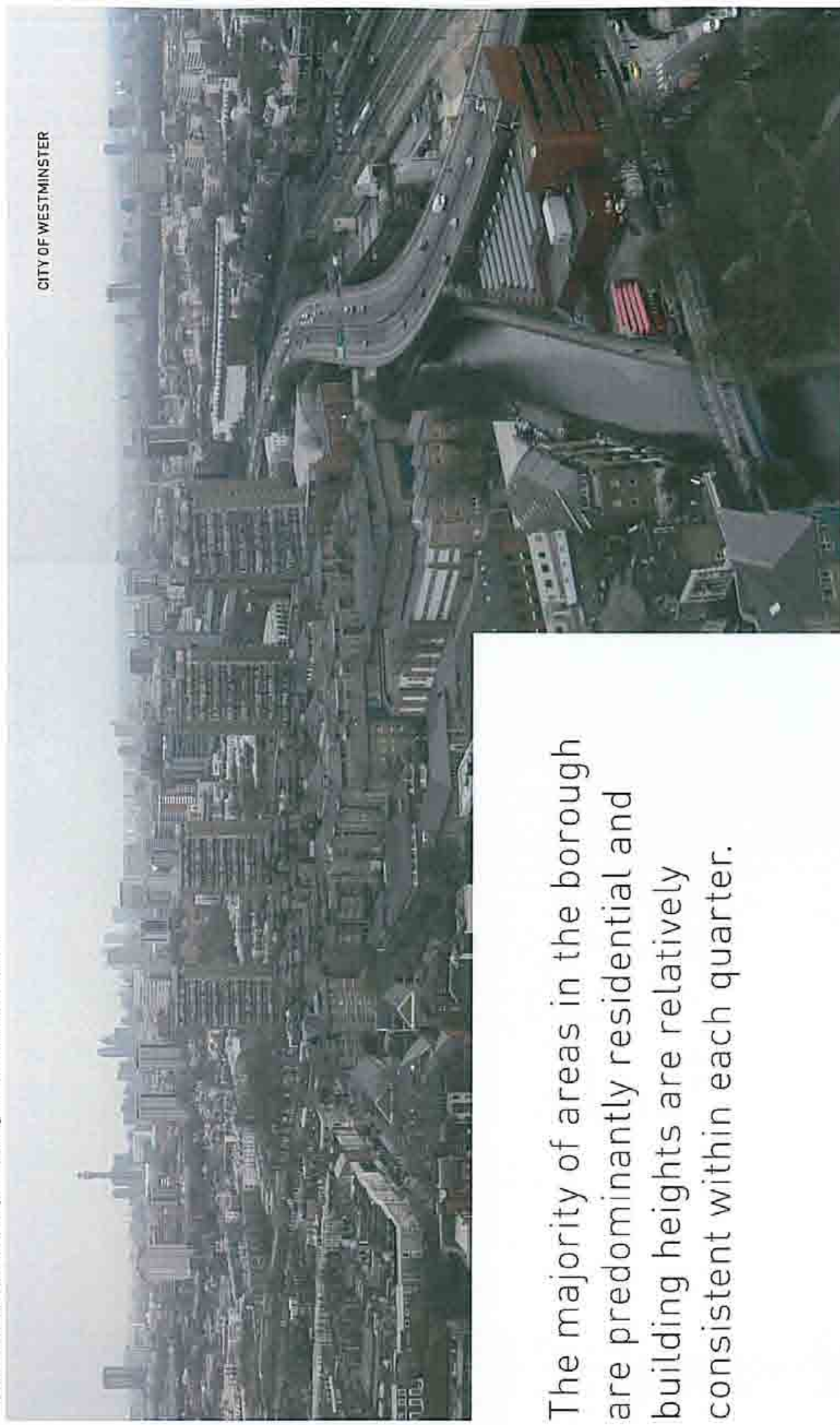


Tall buildings adversely affect historic quarters

FOOTNOTES

- 15 In some of these blocks the interior is built over or comprises of news developments.
- 16 Source: RBKC

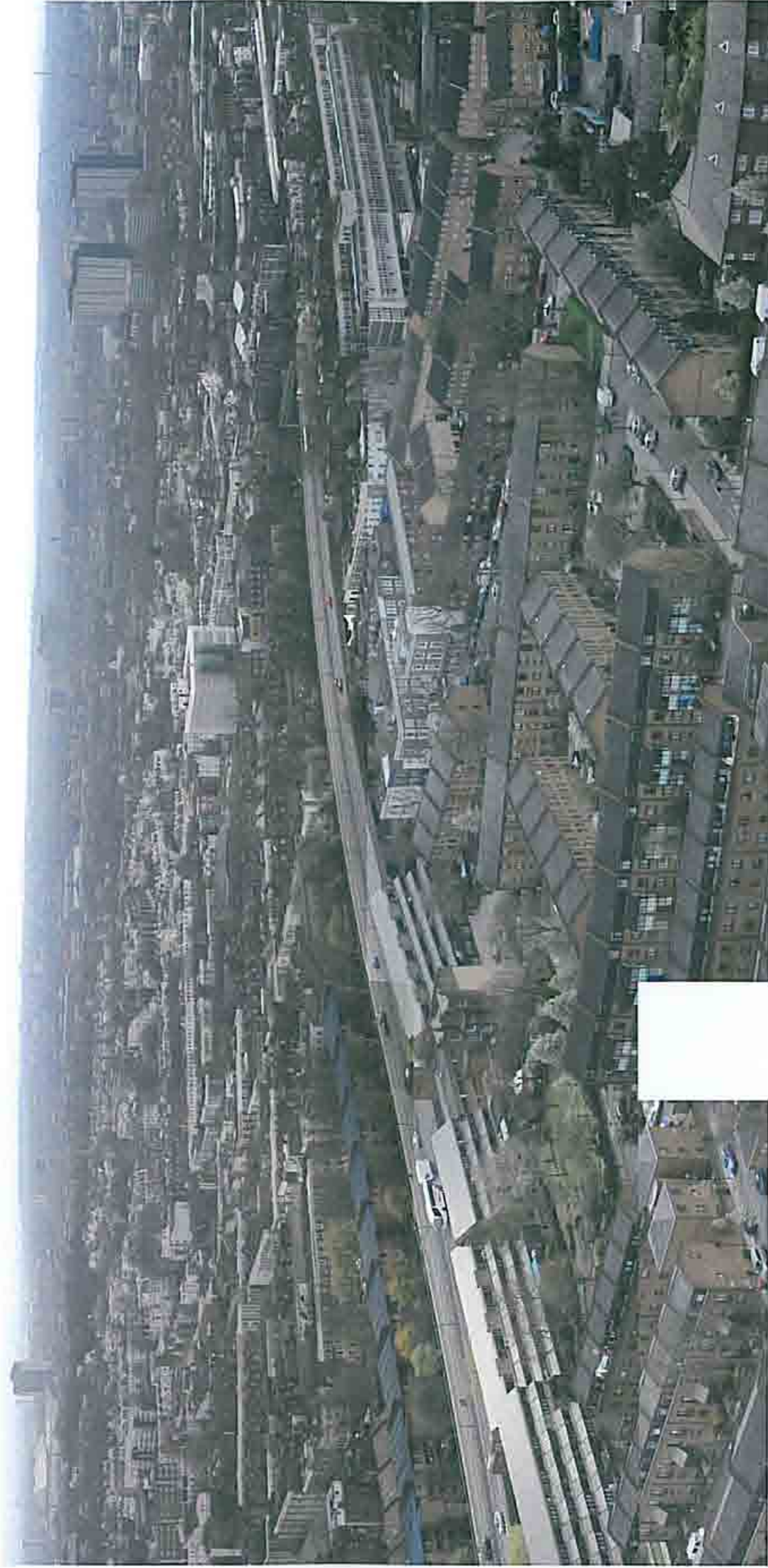
Panoramic View of the Royal Borough from Trellick Tower



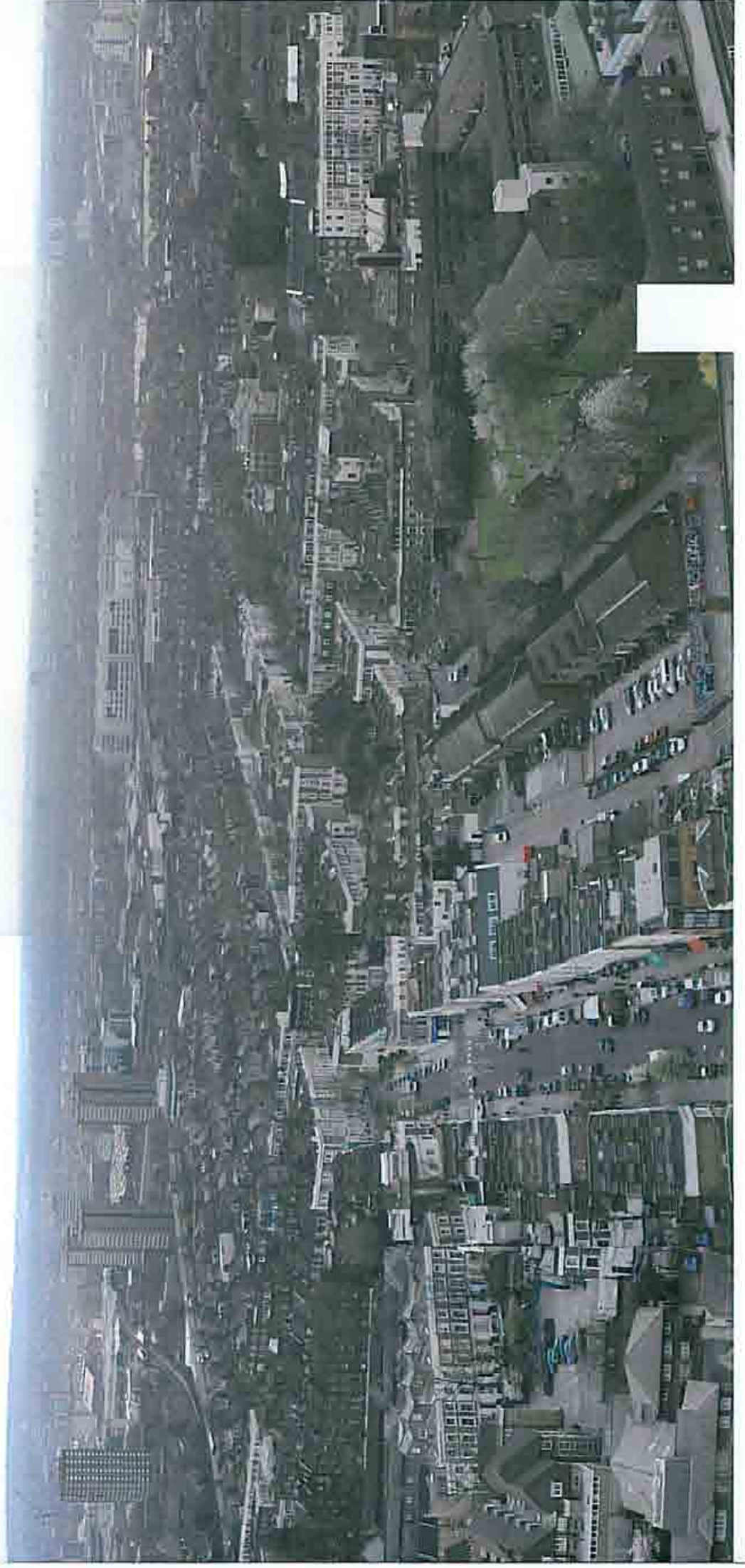
CITY OF WESTMINSTER

The majority of areas in the borough are predominantly residential and building heights are relatively consistent within each quarter.

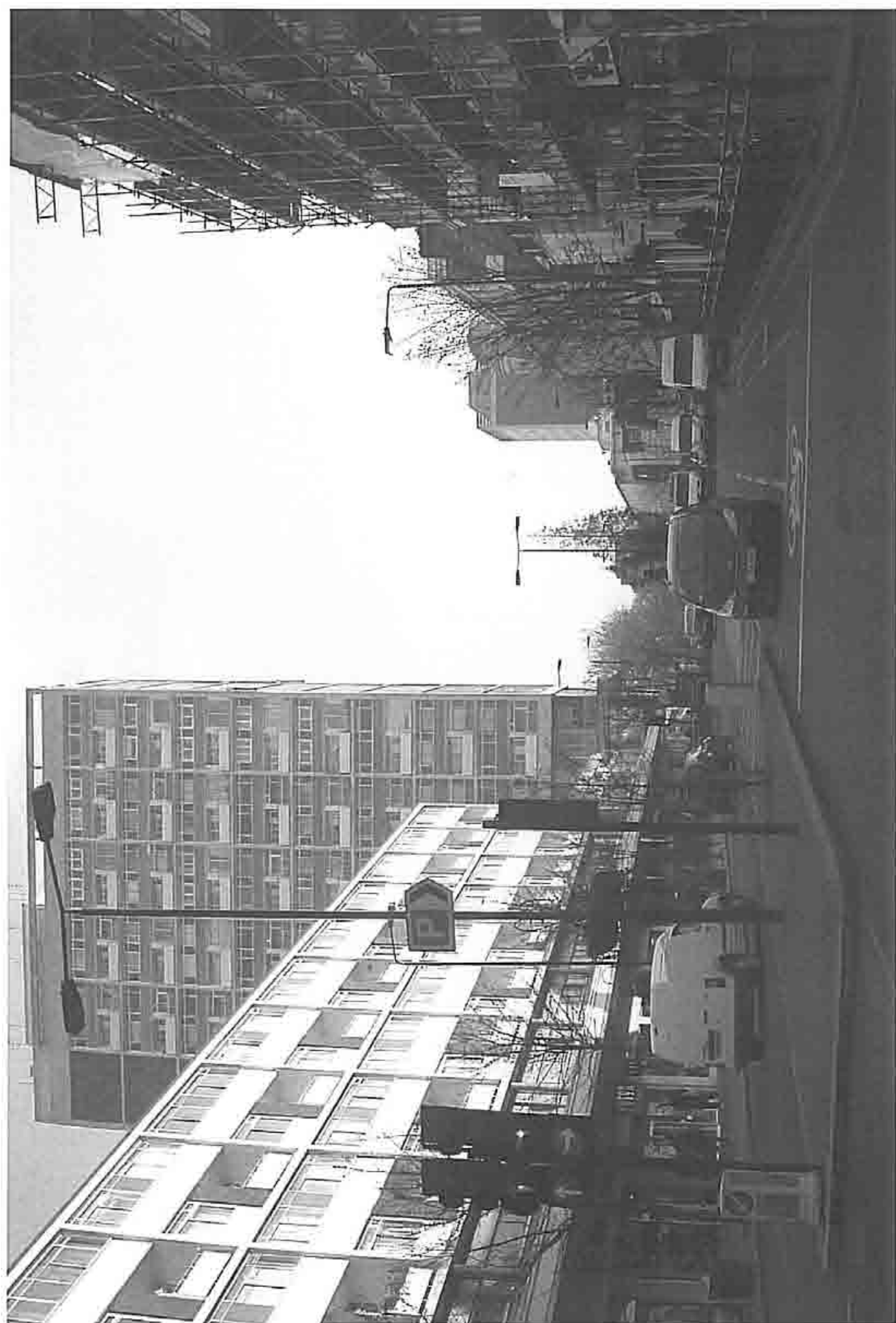




ROYAL BOROUGH OF KENSINGTON AND CHELSEA (FOREGROUND)









English Heritage and CABE's Guidance on Tall Buildings encourages local planning authorities to include specific policies for tall buildings in local development plans [or, in future, development plan documents] clearly identifying, in map-based form, areas which are appropriate, sensitive or inappropriate for tall buildings [para. 2.4, para. 2.6]. The London Plan also sets out that boroughs may wish to identify defined areas of specific character that could be sensitive to tall buildings within their UDPs [Policy 4B.8].

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' (Policy 4B.8). Furthermore, English Heritage and CABE's Guidance on Tall Buildings 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 the elements that create local character, such as streetscape, scale, height, urban grain, natural topography as well as significant views.

In line with the London Plan and English Heritage/CABE's Guidance on Tall Buildings this study identifies appropriate, sensitive or inappropriate areas for tall buildings based on a detailed urban design and character study. This has been done through two converging approaches:

a sieve analysis designed to protect sensitive areas and views

a proactive assessment of where tall buildings can benefit the locality, improve sustainability and enhance the city image

4.2 SIEVE ANALYSIS

This argument sets out which specific areas in the Royal Borough of Kensington and Chelsea are inappropriate or highly sensitive for the development of tall buildings.

4.2.1 CONSERVATION AREAS AND THEIR SETTING

PPS1 clearly states that **a high level of protection should be given to most valued townscapes and landscapes** (para. 17). A large part of the Royal Borough of Kensington and Chelsea derives its character and townscape from its heritage of eighteenth, nineteenth and early twentieth century buildings. The council comprises some 3800 Listed Buildings¹⁷ and has designated 35 conservation areas¹⁸, covering about 70% of the entire borough.¹⁹ These conservation areas mainly comprise homogeneous Georgian and Victorian quarters characterised by urban street blocks, continuous perimeter building lines, fine grain development plots and well-defined and enclosed street spaces. The prevailing local building types are terraces and villas. Average heights range from 2-3 storey terraces in North Kensington to 3-5 storey Georgian and Victorian terraces and town houses, up to 8 storey Edwardian and Victorian Mansion Blocks in the Ladbroke Grove Area, Notting Hill, Holland Park Area, South Kensington and Chelsea.

According to national, metropolitan and local planning documents – PPS1, By Design, PPG 15, English Heritage/CABE's Guidance on Tall Buildings, the London Plan as well as the Kensington and Chelsea UDP – **new developments have to respond to local character and protect and enhance the built heritage.**

By Design 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.**²⁰ Furthermore, English Heritage/CABE's Guidance on Tall Buildings indicates that in some historic towns and areas, historic environment considerations may be of such significance that no tall buildings will be appropriate (para. 2.6).

New development in the conservation areas of Kensington and Chelsea should respond to the character of the Georgian and Victorian quarters. According to the UDP new developments should 'be sensitive to and compatible with the scale, height, bulk, materials and character of the surroundings' (CD27) and reflect the traditional urban form of the Royal Borough by preserving local plot widths, building lines, roofscape and open space (CD 28). The Royal Borough will also oppose any new building 'which would significantly exceed the height of neighbouring buildings and which would harm the skyline' (CD37).

HB1

Due to historic environment considerations new development heights should not exceed the height of neighbouring buildings in conservation areas and have the prevailing building height of their surroundings.

HB2

Tall buildings will normally be unacceptable within the Royal Borough's conservation areas.

Buffer Zones / Impact Areas

English Heritage/CABE's Guidance on Tall Buildings indicates that new developments have to 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.

Also, PPG15 states that where a listed building forms an important visual element in a street, it would probably be right to regard any development in the street as being within the setting of the building (para. 2.17). It further highlights that a proposed high or bulky building might also affect the setting of a listed building some distance away, or alter views of a historic skyline.

Tall buildings, when seen from the streets of conservation areas in the Royal Borough appear out of place disrupting the urban pattern, scale, roofscape and building line of the homogenous Georgian and Victorian quarters. The Kensington and Chelsea UDP makes it clear that it will resist any development, which would adversely affect the setting of a listed building (CD69).



Tall buildings, when seen from conservation areas, appear out of place

In order to protect the character and appearance of conservation area and their settings, this High Building Strategy defines a 100 m Buffer Zone around the conservation areas of the Borough.

The size of this Buffer Zone is based on a typical section through a Victorian and Georgian street in the Borough, i.e. 5 storey buildings with a 25m face-to-face distance. In this case a building of 45 m height (3x the typical building height) will be seen and encroach above the roofline in a distance of 75 m, whilst a 60 m building will even be disruptive up to 100 m away. Thus, tall buildings within buffer zones are very likely to affect the setting of conservation areas.

This buffer zone is a strategic guideline, and is necessary to achieve consistency. Tall buildings seen from conservation areas through focal or axial could adversely affect a conservation area from distances considerably longer than 100 m.

HB3 Tall buildings will normally be unacceptable within the buffer zones of conservation areas and at greater distances where the building would have an adverse effect on a focal or axial view from within a conservation area.

Subject to consultation with the adjacent boroughs the same principles in respect of the buffer zones will be applied to conservation areas outside the Royal Borough, but adjacent to its boundary. The Royal Borough can refuse an application on the basis that it has a detrimental impact in the conservation areas of the next door borough.

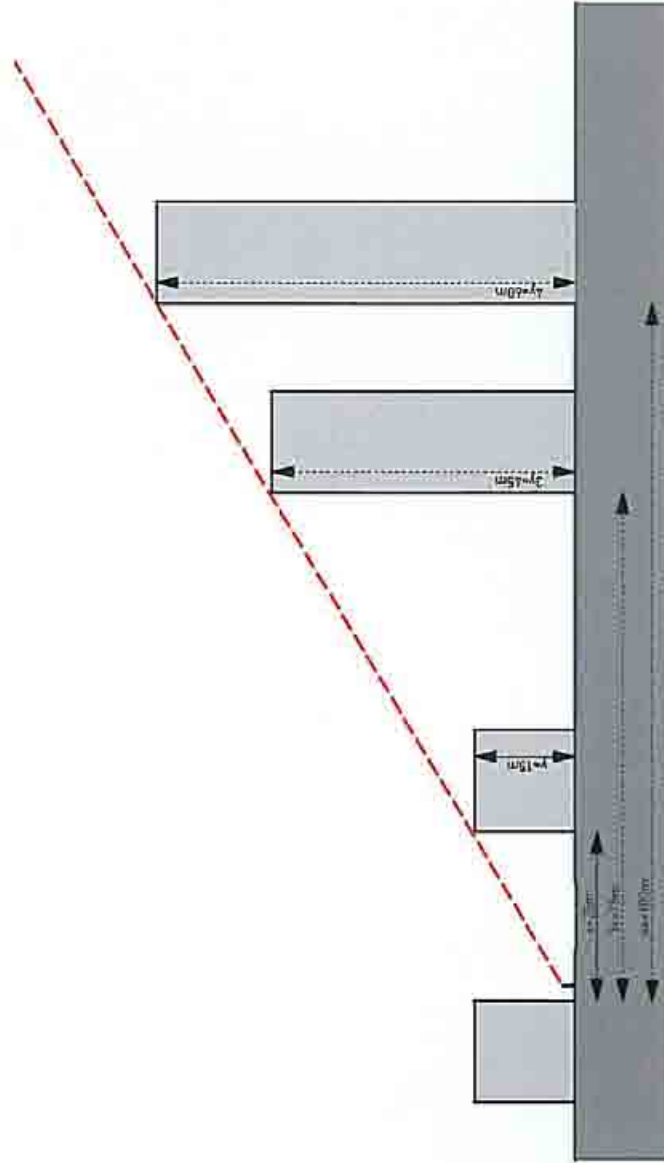
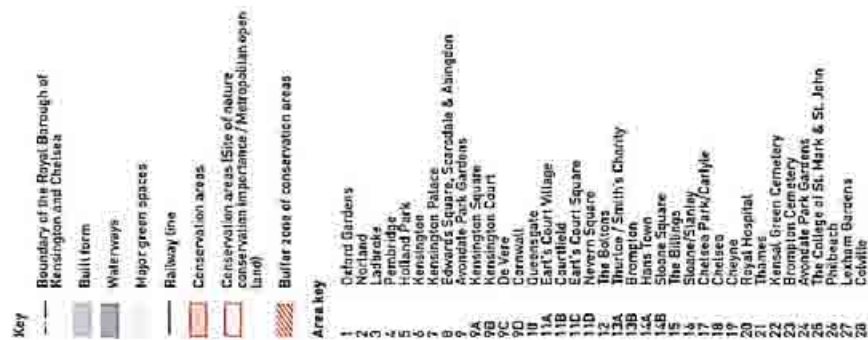


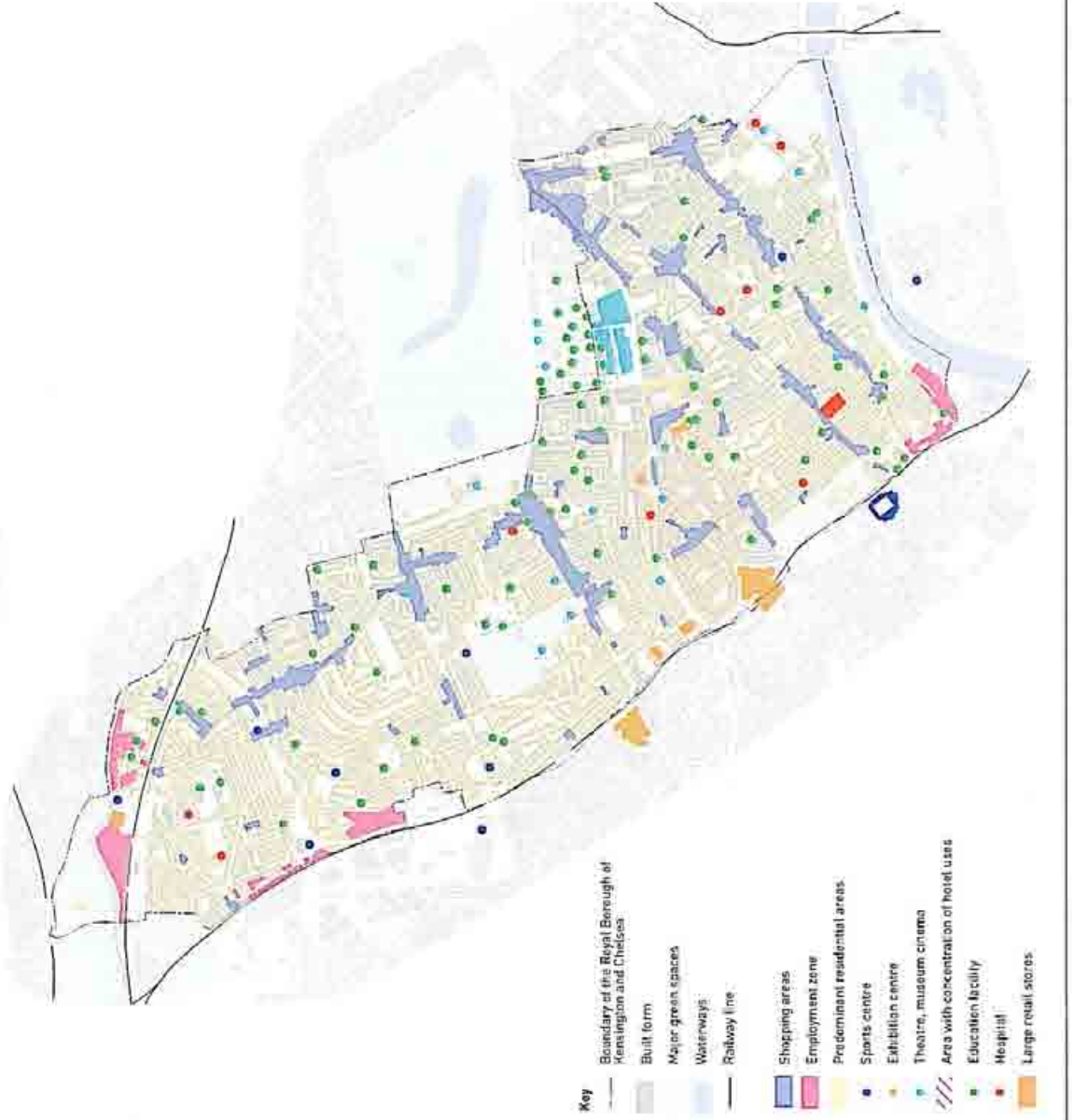
Figure 3: schematic section through a typical Victorian / Georgian street in the RBKC

Key ——— Boundary of the Royal Borough of Kensington and Chelsea



4.2.2 PRESERVATION OF RESIDENTIAL ENVIRONMENTS AND AMENITY SPACES

Figure 3 – High Building Strategy
Land Use



The London Plan states that tall building design should pay particular attention, in residential environments, to privacy, amenity and overshadowing (Policy 4B.9). Likewise, the Kensington and Chelsea UDP states that it will resist development, which will significantly overshadow existing adjoining buildings and amenity spaces (CD33) and/or harm the visual privacy of residents (CD35). The Kensington and Chelsea UDP indicates that **all new development has to preserve and enhance the residential character of the Borough** (STRAT 9).

Due to their massing and height, tall buildings usually overshadow, overlook and dominate their immediate surroundings. This is especially harmful for residential environments and amenity spaces. Furthermore, tall buildings can have a negative impact on micro-climates in terms of wind, sun and reflection. Tall buildings can also harm the network of public spaces. They are usually autonomous building structures that are freely placed on their development plots and poorly relate to the historic street and development patterns. Links between neighbouring areas are often blocked, and permeability and connectivity are low. Thus, public spaces are weakly defined and lack enclosure, legibility and passive supervision. Ambiguous spaces make it difficult to orientate and personal safety fears deter non-residents from passing through estates of tall buildings.

Furthermore, tall buildings are often impersonal and therefore weaken the sense of ownership of an area by its people.

The Borough of Kensington and Chelsea is predominantly residential and consists mostly of low rise terraces and mansion blocks. Pockets of office use, hotels and retail are mainly found around public transport nodes and along key corridors.

HB4 Due to its predominantly residential character, most of the Borough is highly sensitive to the development of tall buildings.

HB5 Tall buildings should normally not be developed in the immediate surroundings of low to medium rise residential developments.

4.2.3 PROTECTION OF STRATEGIC AND LOCAL VIEWS

The London Plan recognises the value of London's historic built environment and the need to protect its most important views. To achieve this the London Plan Policy 4B.15 designates 26 strategically important views of four types: London panoramas, river prospects, townscape views and linear views²¹. The policy indicates that views will only be considered for designation where²²:

- the viewing place is open, publicly accessible and well used
- significant parts of London, or significant buildings, are visible
- the view is highly valued and allows for the appreciation and understanding of London as a whole, or of major elements within it
- 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.

In line with the London Plan the present study identifies landmark buildings as well as London panoramas, river prospects, townscape views and linear views. Based on the designation criteria of the

London Plan and the Kensington and Chelsea UDP the following local views and landmarks have been identified in the Royal Borough of Kensington and Chelsea:

1. London Panoramas

- LP1: Kensington Gardens and Hyde Park [CD13]
- LP2: Holland Park [CD15]
- LP3: Royal Hospital [CD8]
- LP4: Brompton Cemetery
- LP5: Kensal Green Cemetery

2. River prospects

- RP1: River views of Chelsea Embankment and the setting of Chelsea Old Church as well as views from the Thames bridges [CD1]²³

3. Townscape views

- TV1: View of Kensington Palace and Kensington Town Hall from the east across the Round Pound [CD14]
- TV2: View from Chelsea bridge towards World's End Estate

4. Linear views

Strategic View

- LV1: Strategic view of St. Paul's Cathedral from King Henry's Mound [STRAT 12 + CD17]

Views and vistas around Kensington Palace (CD14)

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

Views and vistas in and around the Royal Hospital (CD8)

- 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 (CD10), particularly the Natural History and Victoria and Albert Museums, the Colcutt Tower and Brompton Oratory (CD11)

- 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 Thurlbe 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).

Views and vistas to Trellick Tower

LV10: View of Trellick Tower from the Grand Union Canal

LV11: View of Trellick Tower from Gulborne Road with St. Lawrence (Portobello Road)

Axial Street Views

LV12: View from Cromwell Road with Earls Court Road to the west

5. Landmarks

- L1: Trellick Tower
- L2: Kensington Palace
- L3: Kensington Town Hall
- L4: Albert Hall (WCC)
- L5: The Colcutt Tower (WCC)
- L6: Natural History Museum
- L7: Victoria and Albert Museum
- L8: Brompton Oratory
- L9: The Royal Hospital
- L10: Earls Court
- L11: Harrods
- L12: Lots Rd Power Station
- L13: Barkers, Kensington
- L14: St Mary Abbots, Kensington

Furthermore, the church spires of the Royal Borough form important landmarks. Due to their slim and tapered profile, they contribute to an attractive skyline without harming their surroundings.

The Kensington and Chelsea UDP makes it clear that it will consider the effect of development proposals on views identified in the Council's Conservation Area Proposals Statements and generally within conservation areas (CD63). In doing so the impact of new development will be considered on the foreground, background and lateral area of the protected view (para. 4.3.30).

HB6 New developments should not block or dominate a landmark or create an intrusive element in the view's foreground, middle ground or background.

Furthermore, the UDP requires 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).

The UDP also seeks to protect the River Thames and its setting (STRAT 13) and has designated the whole of the Thames within the Borough boundaries as a conservation area²⁵. 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).



LP1: Kensington Gardens and Hyde Park (panoramic view)



LP2: Holland Park (view towards the south)





The Royal Borough seen from the River Thames (River Prospect)





LP3: Royal Hospital (panoramic view)



LP4: Brompton Cemetery (panoramic view)





Backdrops (London Panorama, River Prospects) and Viewing Corridors

In order to preserve significant views and their settings, this High Building Strategy defines viewing corridors for Townscape and Linear Views. Furthermore, the strategy determines backdrops around London Panoramas and River Prospects. This backdrop is an area three 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 Georgian and Victorian 5 storey building (i.e. 15 m), where a building of 45 m height will be seen in a distance of three times the distance between the relevant viewing point and the distinct building line.

- HB7 Any new tall building within Viewing Corridors and backdrops (Panorama / River Prospect) is likely to have a negative impact on the identified view by disrupting its setting and character.**
- HB8 Any new tall building will normally be unacceptable within a landmark viewing corridor or a London Panorama / River Prospect backdrops.**

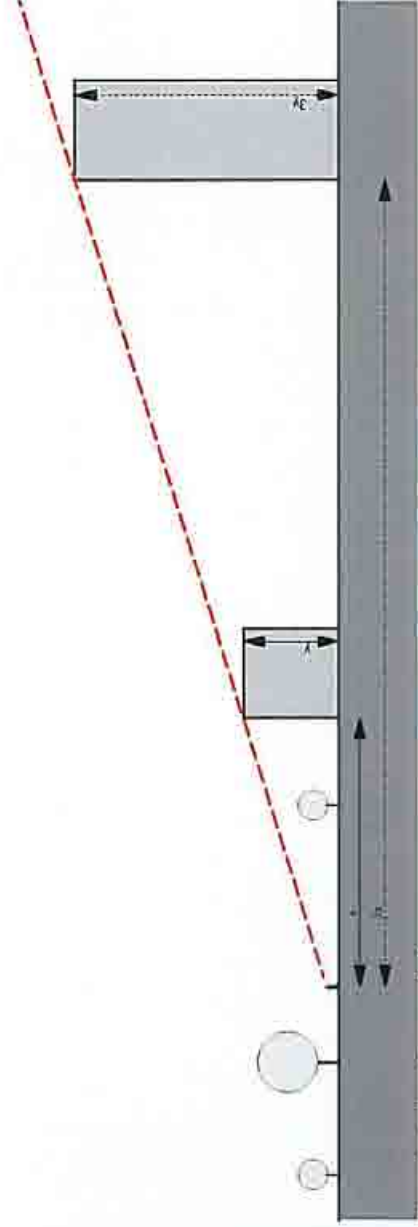
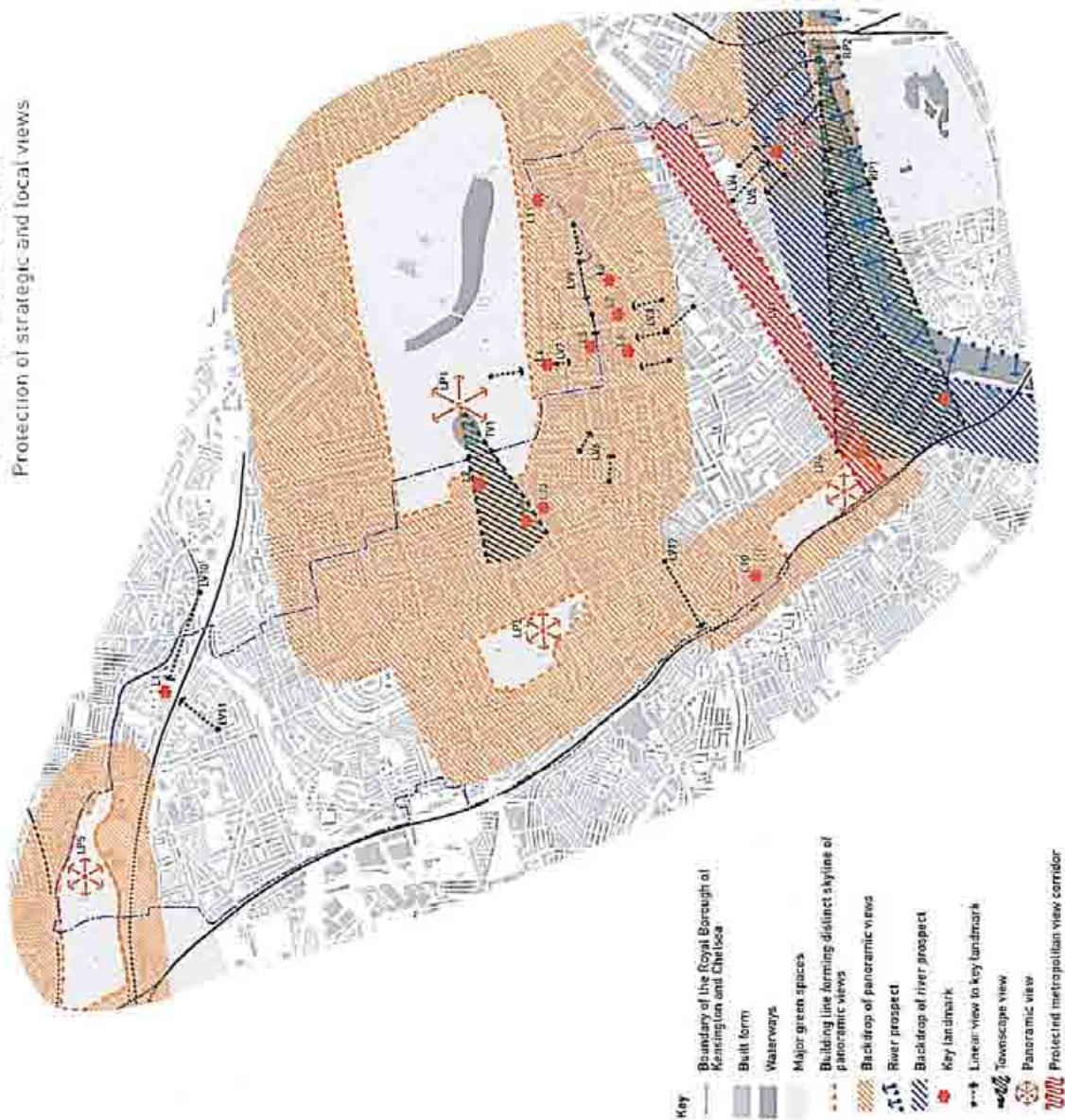


Figure: backdrop of panoramic views

Figure 4 – High Building Strategy
Protection of strategic and local views



4.3 PROACTIVE ASSESSMENT

This section sets out specific areas in the Royal Borough of Kensington and Chelsea, which could eventually be appropriate for tall buildings.

In the urban design context there are three main arguments for the development of tall buildings: Sustainability, City Image and Regeneration. The Sustainability argument deals with high density development in line with public transport capacity, whilst the City Image Approach is concerned with the legitimacy of a city.

4.3.1 THE SUSTAINABILITY ARGUMENT: HIGH DENSITY DEVELOPMENT AROUND MAJOR TRANSPORT NODES

With an increasing energy awareness and the need for sustainable development, density in urban areas should relate to the degree of accessibility by means of 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 (para. 76). Likewise, the Kensington and Chelsea UDP underlines that high trip-generating development should be located in areas well served by public transport (TR1).

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 interchanges³⁶. Areas within walking distance of up to 400 m (up to 10min walk) from public transport nodes are highly accessible and can ideally be developed to higher densities.

The Royal Borough of Kensington and Chelsea is well served and accessible by underground (11 stations) and surface rail (2 stations). Only North Kensington and South Chelsea are less well served by tube and train. Accessibility of rail public transport will be improved in West Chelsea, South Fulham and along the western border of the Borough through the planned Chelsea/Hackney Line, the Core Orbital and new stops on the West London Line. Based on a 400 m catchment area around major public transport nodes, the Royal Borough of Kensington and Chelsea shows several possible areas for high density developments.

The London Plan asks boroughs to ensure that developments among other principles maximize the potential of sites, are sustainable, durable and adaptable (para. 4.36). The Plan also highlights that compact city and intensive development does not necessarily imply high-rise buildings and that London has achieved some of its highest residential densities in relatively low-rise areas (para. 4.55).

Tall buildings are only one possible model for high density. Densities are linked to building height, form and footprint of development. In most of the Royal Borough of Kensington and Chelsea the urban street

block is the dominant development form and in some blocks the inner courtyards are built over. Depending on building height these very compact development patterns result in medium to high density areas. Parts of Notting Hill, Kensington, South Kensington and North Chelsea are even of a higher to high density. Compact development forms – such as terraces, five storey mansion blocks or apartments built around garden squares – can, just as much as towers, achieve high densities.

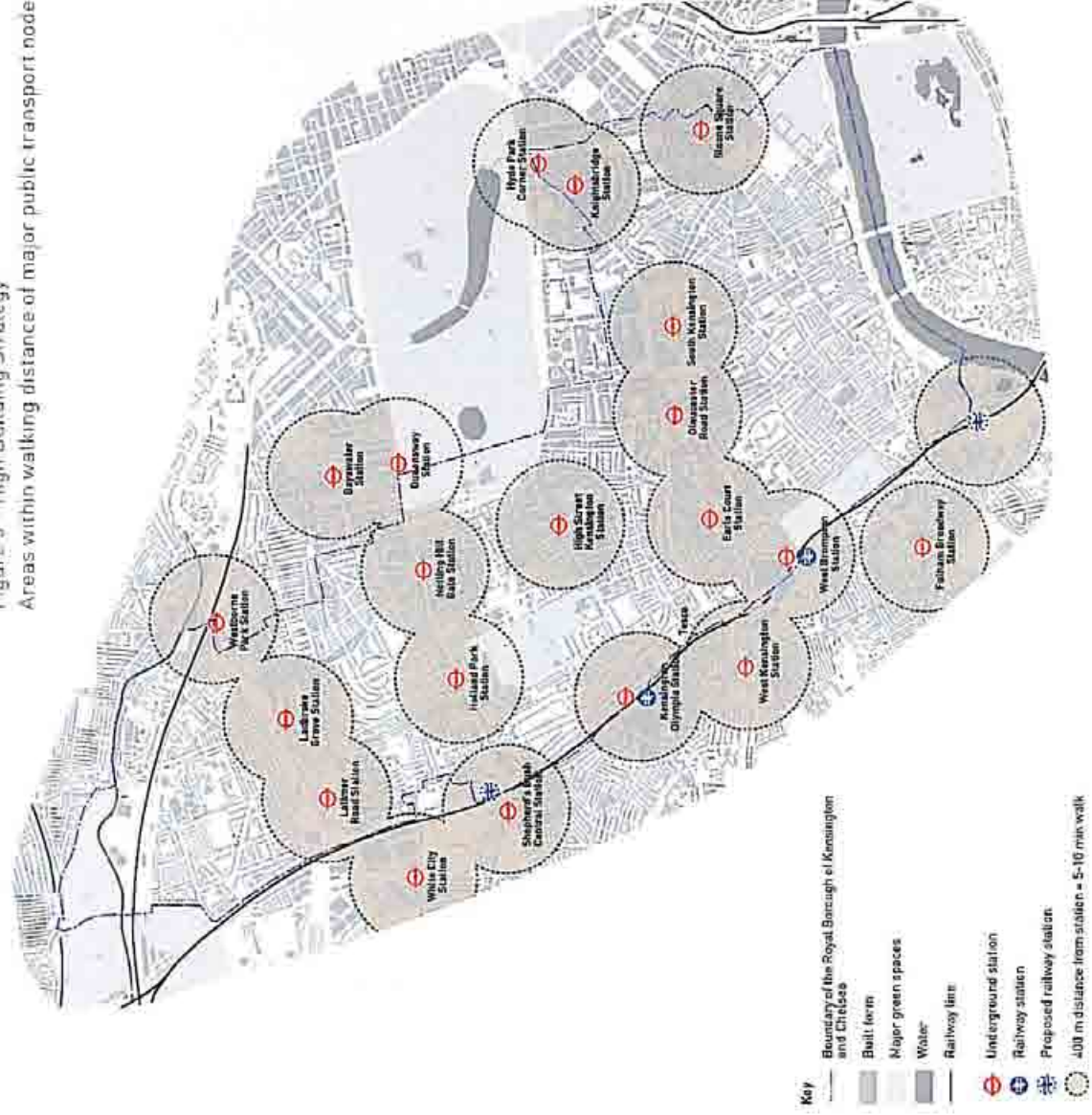
Georgian and Victorian building typologies not only achieve high densities through low rise buildings, they have also proven robust and adaptable. Fine grain, the unique arrangement of streets and squares together with the flexibility of the historic housing stock proved a successful combination for continuous residential uses: over the past two centuries large parts of the Borough have been able to adapt to changing living and lifestyle requirements and have only seen minimal structural change. Therefore, in the Royal Borough of Kensington and Chelsea high density should continue to be achieved through the traditional Georgian and Victorian building typologies.

Most of the 400 m walkbands are within conservation areas and therefore not appropriate for the development of tall buildings.

Additionally, it should be considered that some of the stations – such as High Street Kensington, Knightsbridge, Sloane Square and South Kensington – are already highly overcrowded at peak periods and not able to cope with existing demand.

HB9 Outside the 400 m walkbands higher density developments will generally not be appropriate due to insufficient accessibility unless they are instrumental in bringing about significant public transport improvements.

Figure 5 – High Building Strategy
Areas within walking distance of major public transport nodes



4.3.2 THE CITY IMAGE APPROACH

This part of the study analyses the positive effects that tall buildings can have on the image and legibility of a city. The image of the Royal Borough of Kensington and Chelsea is that of a residential area with a number of significant shopping streets and some hotels. Thus, there are only a few locations where a tall building would be in harmony with that image.

4.3.2.1 Economic clusters of related activities / CBD

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 and/or act as a catalyst for regeneration (Policy 4B.8) and identifies opportunity areas capable of accommodating substantial new jobs or homes (para. 2.8). According to the London Plan no opportunity areas are located within the Royal Borough of Kensington and Chelsea. The nearest opportunity areas are Paddington, Victoria and White City. Of these, White City should relate to the intensification of development at Shepherd's Bush.

The 'World City' argument

London is one of the world's major business, political and cultural centres. It has a considerable influence worldwide and is widely 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.

Global' companies invest in their corporate image: Head offices are usually bespoke buildings of high quality and 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 UK, if not enough tall building opportunities are provided in London.

Nevertheless, there is no evidence that 'global cities' need to be characterised by tall buildings or that 'global' companies must have tall buildings, and if not, will need to locate outside the UK. Height is much less of a factor than a well-known and prestigious address. Many 'global' companies have erected low rise buildings, such as Merrill Lynch and Deutsche Bank in the City of London. Should there effectively be a future need for tall 'global' buildings, they could be located in The City of London and Canary Wharf, which already serve to attract advanced producer services. The Royal Borough of Kensington and Chelsea has no clusters of commercial activity, but only some pockets of office use, hotels and retail around public transport nodes and along key corridors.

HB10 The Borough is not suitable to accommodate 'global' economic clusters, which might or might not require tall buildings.

FOOTNOTES

- 17 The Royal Borough of Kensington and Chelsea UDP, 4.11.
- 18 The council prepared for each of these areas conservation area statements, which describe the areas and include proposals for their preservation and enhancement.
- 19 The Royal Borough of Kensington and Chelsea UDP, para. 4.5.1.
- 20 By Design – Urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.21.
- 21 London panoramas: Elevated panoramic views of central London and its suburbs from important public open spaces
River prospects: Broad prospects from the River Thames
Townscape views: Views which focus on architecturally and/or culturally significant groups of buildings which can be enjoyed from well managed public spaces
Linear views: Views on key landmarks (Buckingham Palace and St Paul's Cathedral)
- 22 Boroughs should base the designation and management of local views in their UDPs on Policies 4B.15-4B.17.
- 23 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).
- 24 Often trees mark the boundary of large open green areas and ensure a sense of 'rūs in urbis'. Nevertheless, many trees are deciduous and buildings behind them can be seen in winter from the open areas.
- 25 The UDP is in line with the Blue Ribbon Network (London Plan), which sets out policies to enhance and protect the special character of the Thames area. The London Plan highlights that 'views to and from the water ways are especially significant because the openness of water spaces allows for relatively long-distance views' (para. 4.123). 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 also recognises that there are a number of adverse effects that tall buildings can have when located adjacent to water spaces (para. 4.125), which include overshadowing, wind turbulence and creating a visual canyon.
- 26 By Design – Urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.27.

4.3.2.2 Landmarks

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 (London Plan, Policy 4B.8). 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.²⁷

To provide guidance on heights for new developments in relation to their surroundings, this study distinguishes between 'Higher Buildings' and 'Tall Buildings':

Higher Building

A 'Higher building' is defined as a building, which is taller than the surroundings, but less than 1+2/3 of the typical building height of the context. Although a 'High Building' stands out, its height-ratio remains integrated into the local context. Scale, massing and height still relate to that of adjoining buildings and can be read as part of the context. 'High Buildings' may create 'Local Landmarks' and express corners and junctions.

HB11

'Higher Buildings' could be permitted in the Borough to create 'Local Landmarks' and express corners and junctions.

Tall Building

A 'Tall Building' is taller than 1+2/3 of the typical building height of the context. 'Tall Buildings' can be divided into 'Ambiguous Landmarks', 'District Landmarks' and 'Metropolitan Landmarks'.

'Ambiguous Landmarks' are defined as buildings whose height is more than 1+2/3x, but less than 3x the typical building height. 'Ambiguous Landmarks' are not high enough to provide landmarks, but tall enough to detract from their surroundings.

HB12 'Ambiguous Landmarks' will be unacceptable in any part of the Borough.

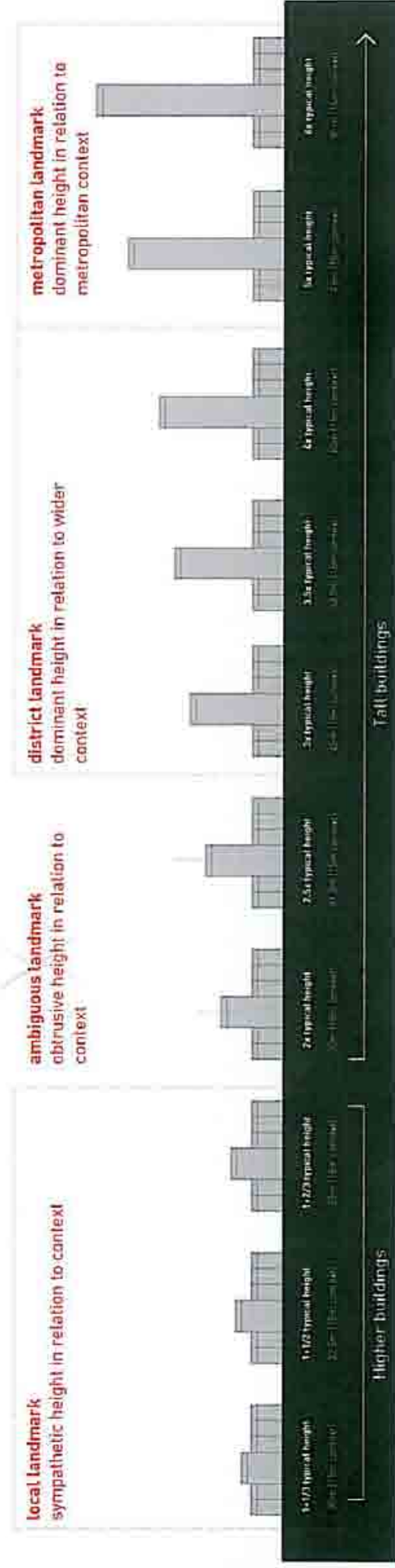


Figure: Distinction of Higher and Tall Buildings for single developments in relation to their context (i.e. 5 storeys)

On the contrary, a building between 3x and 4x the typical height – a 'District Landmark' – has a dominant effect on its immediate and wider surroundings. This type of tall buildings significantly impacts the skyline and can act as strategic district landmark providing orientation points. Due to their height and massing 'District Landmarks' may harm their surroundings by overshadowing, overlooking and disrupting the prevailing local building types.

HB13 'District Landmarks' could enhance the western border of Kensington and Chelsea (West London line) and emphasize central nodes and gateways into Central London.

HB14 Since 'District Landmarks' often harm their surroundings by overshadowing and overlooking, they would require a detailed impact assessment study and masterplan.

'Metropolitan Landmarks' are defined as buildings whose height is more than 4x the typical building height. These buildings – such as Trellick Tower – can be seen from outside the borough and act as significant landmarks on a metropolitan scale. 'Metropolitan Landmarks' have a stronger impact than 'District Landmarks' and may also harm their surroundings by overshadowing and overlooking.

HB15 'Metropolitan Landmarks' should not be developed in the Borough, since Kensington and Chelsea is a predominantly residential borough without Opportunity Areas as set out in the London Plan.

HB16 The Borough is only appropriate for 'Local Landmarks' and/or 'District Landmarks'.

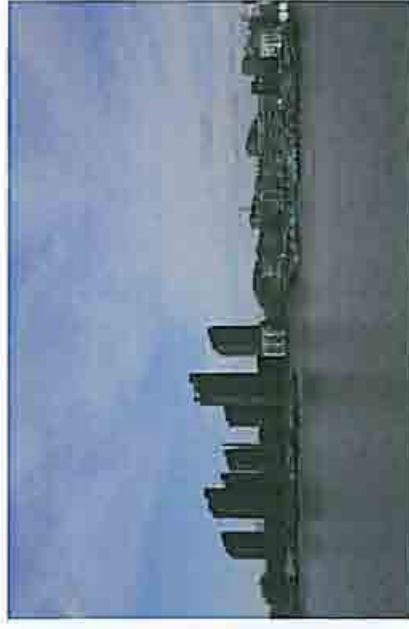
In addition all landmarks will be subject to the normal range of development control policies to ensure that they have a high quality design and do not harm their surroundings by overlooking and overshadowing.

Landmarks along waterways

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' (para. 4.123). 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 also recognises that there are a number of adverse effects that tall buildings can have when located adjacent to water spaces (para. 4.125), which include overshadowing, wind turbulence and creating a visual canyon.

With the exception of seven interlinked towers as part of the Worlds End Estate in Southwest Chelsea, the water's edge of the Royal Borough of Kensington and Chelsea is a Conservation Area and mainly comprised of Georgian and Victorian Heritage.

HB17 In order to protect the built heritage the Kensington and Chelsea UDP defines that any new development on the riverside should preserve and enhance the waterfront character 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).



Views to the Royal Borough from the River Thames

Landmarks along major corridors

Major corridors function as key access and transit corridors. Thus, buildings along major corridors have a strong presence. Due to accessibility and a well-known address, tall buildings are often located along major corridors.

Tall buildings along key corridors can help the legibility of the city by expressing the hierarchy of the street, marking specific points and dividing the corridor into recognisable segments. Nevertheless, the hierarchy of a corridor may also be emphasised through other means than height, such as quality building or public space design.

The major corridors of the Royal Borough of Kensington and Chelsea are well served by buses²⁸ and have a high accessibility. Additionally many of them perform a significant shopping and retail function and have a strong presence on a local and metropolitan scale.

HB18 Most of the major corridors in the Royal Borough of Kensington and Chelsea are within conservation areas and close to residential quarters and therefore not suitable for the development of tall buildings.

Figure 6 – High Building Strategy
Areas along major corridors



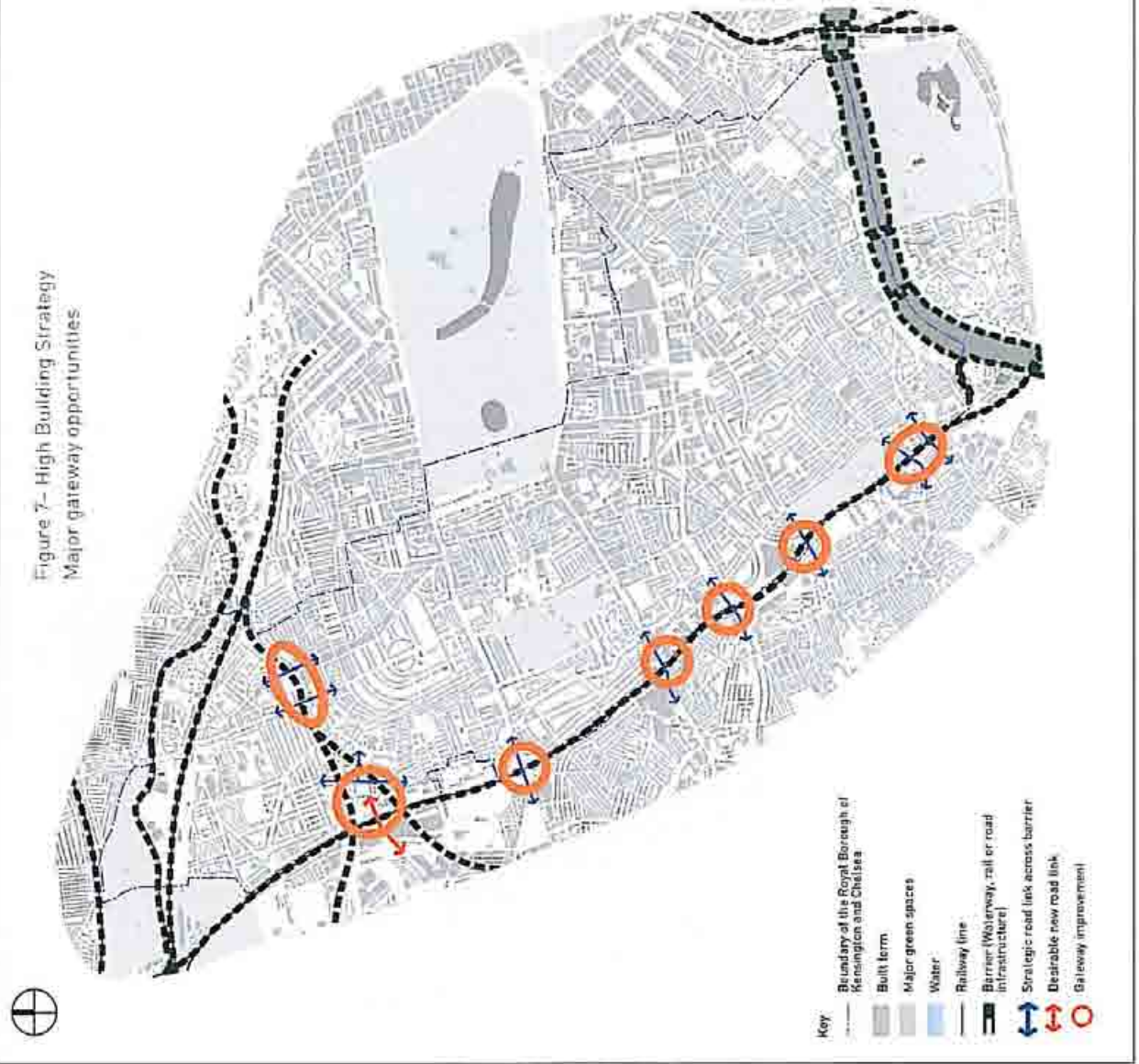
Landmarks that enhance borders and gateways

The Borough boundaries to the south, east and north are formed by major physical barriers. Particular areas along the railway corridors in the west and towards the grand union canal to the north suffer from their fringe location and represent typical tagging border areas. Entrance routes into the Borough have high traffic loads and do not represent attractive gateways into the Borough and Central London. With problems identified on both sides this border zone will need to be addressed through integrated cross border initiatives. Furthermore, accessibility of rail public transport will be improved in West Chelsea, South Fulham and along the western border of the Borough through the planned Chelsea/Hackney Line, the Core Orbital and new stops on the West London Line.

HB19 Stand alone or clusters of tall buildings could enhance the western border of Kensington and Chelsea (West London line) and emphasize gateways into Central London.

HB20 Since gateways along the western border are of a local character, landmarks should not be taller than 3-4x (45-60m) the typical building height of their surroundings.

HB21 Local landmark proposals would also need to show that they do not damage or detract from residential quarters and conservation areas nearby.



Tall Buildings that enhance a particular (public) use

Landmarks can also enhance a particular 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."²⁷

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. The guidance furthermore highlights that buildings with functions of civic importance are one example²⁸. Tall buildings are a very dominant building form and significantly impact the skyline. It is for this reason that local and strategic landmarks should preferably be buildings of public use, such as culture, education, leisure, health, etc.

The London Plan (para. 4.58) highlights that tall buildings create an opportunity for magnificent views from the top floors. To facilitate these views to a wider public, the London Plan recommends that tall buildings should include public spaces on their top floors.

4.3.3 REGENERATION

Regeneration is about bringing 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.

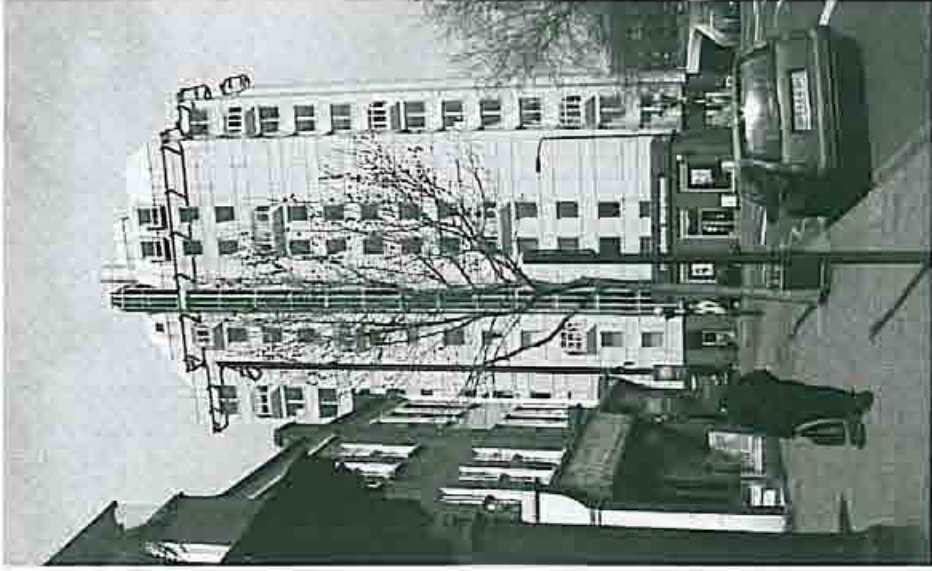
It has been argued that regeneration areas should be represented through tall buildings. Nevertheless, there is no evidence that high-rise buildings act as a catalyst for regeneration. Confidence in regeneration should be signalised through quality urban design and public realm improvement rather than tall buildings.

HB22 Tall buildings should only be located where there is a strong argument for sustainability and improvement of the city image.

FOOTNOTES

- 27 By Design – Urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.21
- 28 Similarly to the underground service, the major bus services operate east-west connecting the Borough well with the centre and West London.
- 29 Spiro Kostof, The City Shaped, London 2001, p. 335.
- 30 By Design – Urban design in the planning system: towards better practice, DETR/CABE, May 2000, p.21.





The High Building Strategy shows that the vast majority of RBKC is inappropriate (Conservation Areas, Protected Metropolitan View Corridor) or highly sensitive (Buffer Zones of Conservation Areas and backdrops of significant views) for the development of tall buildings.

5.1 IDENTIFICATION OF INAPPROPRIATE, SENSITIVE AND APPROPRIATE AREAS FOR TALL BUILDINGS

Based on the sieve and proactive analyses, the study identifies 5 categories, three inappropriate, one sensitive and one possible area for the development of tall buildings.

1. Conservation Areas – Inappropriate for tall buildings
The Royal Borough of Kensington and Chelsea has designated 35 conservation areas, covering about 70% of the entire borough.

HB23 In all conservation areas historic environment considerations are of such significance that any tall building will be unacceptable.

2. Protected Metropolitan View Corridor – Inappropriate for tall buildings
The Royal Borough of Kensington and Chelsea is crossed by one Protected Vista, St Paul's Cathedral from King Henry's Mound in Richmond.

HB24 In accordance with RPG 3A any tall building will be unacceptable within the Protected Metropolitan View Corridor.

3. Areas outside major transport nodes and corridors – Inappropriate for tall buildings due to lack of accessibility

High Density Developments – among them tall buildings – should only be promoted close to major transport nodes and corridors.

HB25 Outside 400 m walkbands higher density developments will generally not be appropriate due to lack of accessibility.

4. Buffer Zones of Conservation Areas, backdrops of London Panoramas and River Prospect and Viewing Corridors – Highly sensitive for tall buildings
The Kensington and Chelsea UDP highlights that it will resist any development, which would adversely affect the setting of a listed building (CD 69) or alter views of a historic skyline³¹. In order to protect conservation areas and significant local views this study defines Buffer Zones around Conservation Areas, backdrops around London Panoramas and River Prospects as well as Viewing Corridors for significant Townscape and Linear Views. Tall buildings within Buffer Zones or Viewing Corridors are likely to have a negative impact on the identified views or conservation areas nearby.

HB26 Tall buildings will normally be unacceptable within a Buffer Zone, backdrop or landmark viewing corridor.

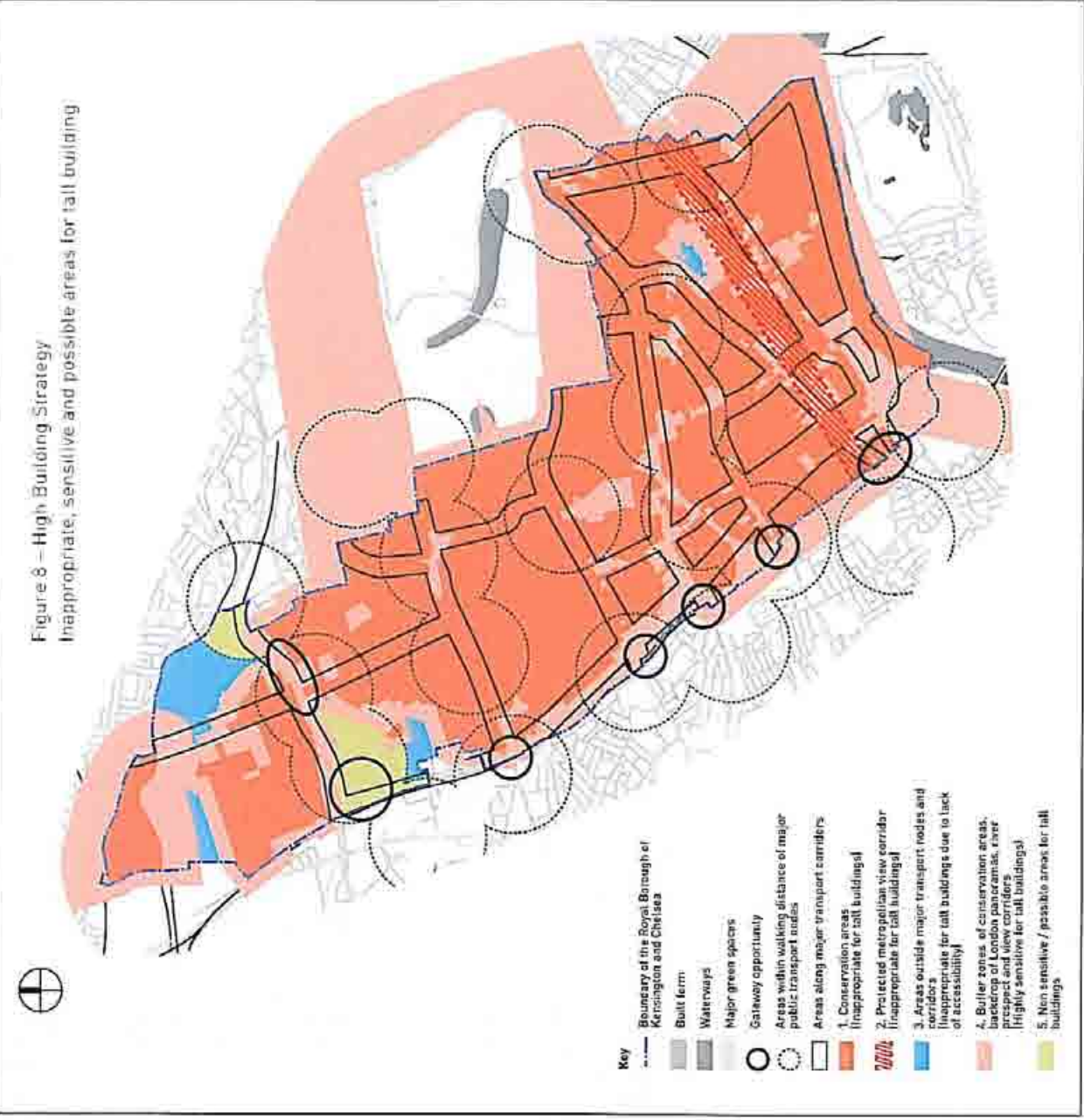
HB27 There would be a presumption against tall buildings in these sensitive areas.

HB 28 Tall buildings could only be allowed in exceptional circumstances and where its clearly demonstrated that they don't harm their surroundings and make a positive contribution to sustainability, city image and public realm.

5. Non sensitive / possible areas for tall buildings
Stand alone or clusters of tall buildings could enhance the western border of Kensington and Chelsea (West London line) and emphasize gateways into Central London.

HB 29 Gateways along the western border should be marked by 'District Landmarks' and not be taller than 3-4x (45-60m) the typical building height of their surroundings.

HB30 'District Landmark' proposals would also need to show that they do not damage or detract from residential quarters and conservation areas nearby.



The High Building Strategy shows that the vast majority of RBKC is inappropriate [Conservation Areas, Protected Metropolitan View Corridor] or highly sensitive [Buffer Zones of Conservation Areas and backdrops of significant views] for the development of tall buildings.

Only two areas in the borough are not situated in inappropriate or highly sensitive areas for tall buildings and at the same time well served by public transport: Latimer Road tube station area and Westbourne Park tube station area. Both areas are located at the borders of the borough, along major transport corridors and around tube stations of the Hammersmith & City Line.

Latimer Road tube station area

This area is located around Latimer Road tube station and bordered by two strategic roads, Westway (A40) and West Cross Route (A3220), as well as the West London Line. These major transport corridors act as strong barriers to the north and west (White City). Furthermore, the area is characterised by the Latimer Road Estate, a cluster of five stand alone residential towers. These towers have a negative perception, overshadow existing adjoining buildings and amenity spaces and harm the visual privacy of residents. Public spaces are weakly defined and lack enclosure, legibility and passive supervision.

New additional tall buildings could eventually be located in this area to emphasize the importance of the transport node and mark a gateway into North Kensington. Nevertheless, the existence of tall buildings does not necessarily imply permission for additional or

new tall towers. The need and benefit of tall buildings in this area would need to be addressed through a detailed masterplan and assessment study.

If proven beneficial new tall buildings could add to or replace the existing cluster of Latimer Road Estate. Tall buildings should only be 'District Landmarks' and not taller than 3-4x (45-60m) the typical building height of their surroundings. Furthermore, new development would need to address the weakly defined public spaces and create enclosed and safer streets with active frontages.

Since there are hardly any physical links to the West, it would be difficult to relate any possible development around Latimer Road tube station to the White City Opportunity Area. To improve connectivity to the neighbouring quarters new linkages across the Hammersmith & City Line and West London Line would need to be created.

Westbourne Park tube station area

The other possible area for the development of tall buildings is a small pocket situated around Westbourne Park tube station and enclosed by Harrow Road (A404), the Grand Union Canal, Great Western Road and Westway (A40). Moreover, the Great Western Railway intersects this already fragmented area.

Due to its fragmentation and segregated and small development plots the area does not seem suitable for a new centre of tall buildings. Nevertheless, the gateway at Westway (A40) could be enhanced through a 'Local

Landmark' or 'District Landmark'.

There is the risk that any new tall building could block or impose on Trellick Tower, a listed building and landmark of metropolitan importance. Thus, any new tall building would need to show that it does not harm the views on Trellick Tower and undermine the setting of this listed building.

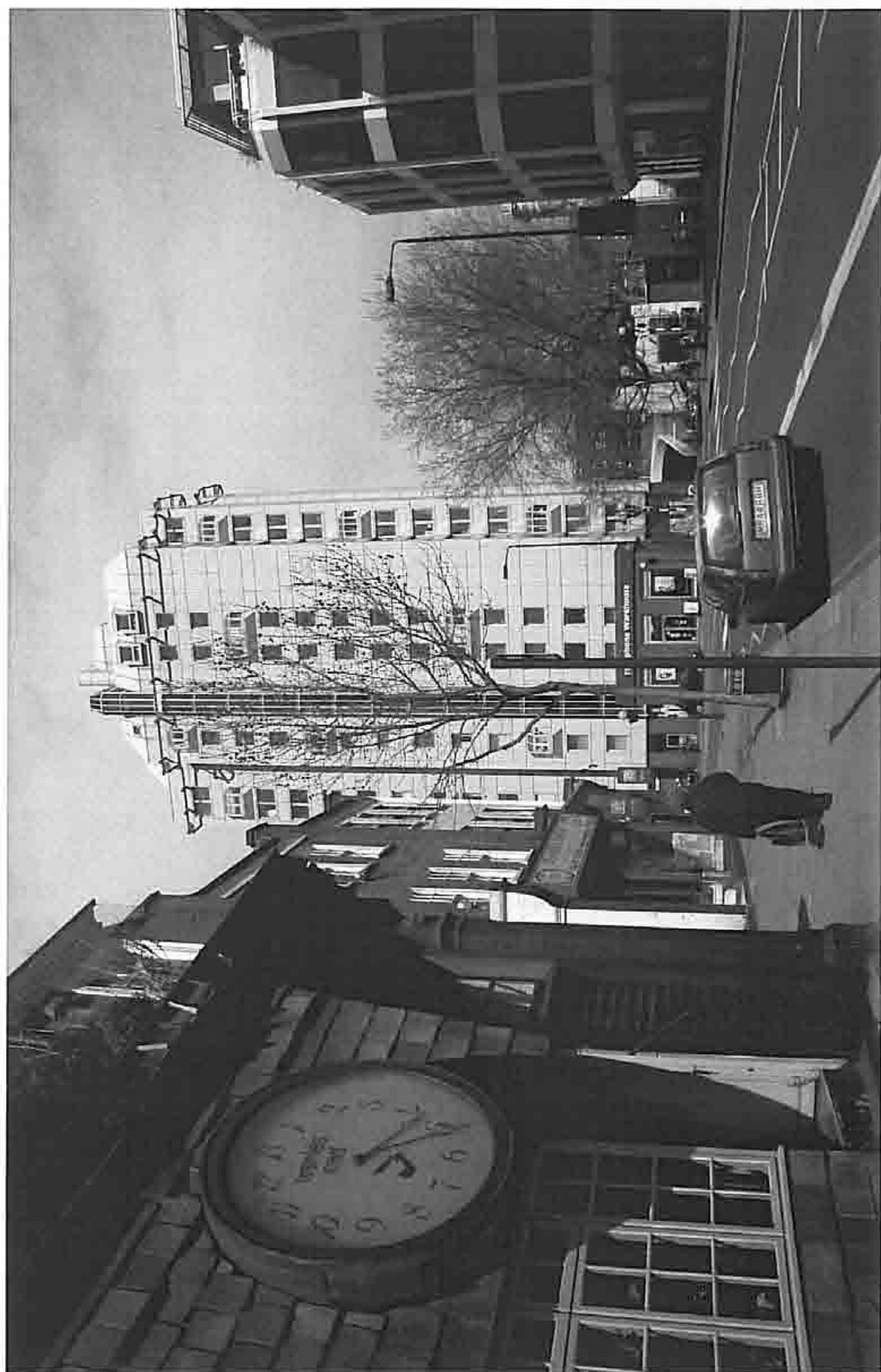


View on Trellick Tower

FOOTNOTES

- 31 The UDP requires 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). The UDP also seeks to protect the River Thames and its setting (STRAT 13) and states that any new development on the riverside should '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).

	Conservation Areas	Protected Metropolitan View Corridor	Areas outside major transport nodes and corridors	Buffer Zones of Conservation Areas, London Panoramas, River Prospect and Viewing Corridors	Non sensitive / Possible areas for tall buildings
SENSITIVITY TO THE DEVELOPMENT OF TALL BUILDINGS	Inappropriate for tall buildings	Inappropriate for tall buildings	Inappropriate for tall buildings due to (current) lack of accessibility	Highly sensitive for tall buildings	Possible areas for tall buildings
HEIGHT RESTRICTION	Prevailing height of surrounding buildings	RPG 3A	Prevailing height of surrounding buildings	<p>Buffer Zones of Conservation Areas: Prevailing Height of surrounding buildings</p> <p>River Prospect: "be of a height no greater than the general level of existing building heights to the east of Blantyre Street" (i.e. 5 storeys) (UDP, CD6).</p> <p>Buffer Zones of London Panoramas: Buildings, which can be seen from Kensington Gardens and Hyde Park, should not exceed the general height of buildings – excluding post war blocks – and pay regard to the tree lines (UDP, CD13).</p>	45-60 m (local landmarks)





Tall buildings are likely to have a greater impact than other building types due to their massing and size. This section sets out the necessary Design Criteria for tall buildings in general and in the specific context of the Royal Borough of Kensington and Chelsea.

6.1 LONDON PLAN

According to the London Plan (Policy 4B.9) large-scale buildings including tall buildings should be of the highest quality design and in particular:

meet the requirements of the View Protection Framework set out in Policy 4B.15 of the London Plan (see also 2.2.1 London Plan)

be suited to their wider context in terms of proportion and composition and in terms of their relationship to other buildings, streets, public and private open spaces, the waterways or other townscape elements

be attractive city elements as viewed from all angles and where appropriate contribute to an interesting skyline, consolidating clusters within that skyline or providing key foci within views

illustrate exemplary standards of sustainable construction and resource management and potential for renewable energy generation and recycling

be sensitive to their impact on micro-climates in terms of wind, sun, reflection and overshadowing

pay particular attention, in residential environments, to privacy, amenity and overshadowing

be safe in terms of their own integrity and the safety of occupiers and have an acceptable relationship to aircraft, navigation and telecommunication networks

be appropriate to the transport capacity of the area ensuring adequate, attractive, inclusive and safe pedestrian and public transport access

provide high quality spaces, capitalise on opportunities to integrate green spaces and planting and support vibrant communities both around and within the building

where appropriate, contain a mix of uses with public access, such as ground floor retail or cafes

relate positively to water spaces taking into account the particular needs and characteristics of such spaces.

The London Plan also highlights that tall buildings create an opportunity for magnificent views from the top floors (para. 4.58). To facilitate these views to a wider public, the London Plan recommends that tall buildings should include public spaces on their top floors.

6.2 DESIGN AND EVALUATION CRITERIA FOR TALL BUILDINGS IN THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA

The Royal Borough of Kensington and Chelsea is predominantly residential and characterized by its outstanding Georgian and Victorian quarters. Thus, conservation areas as well as the Protected Metropolitan View Corridor (St Paul's Cathedral from King Henry's Mound in Richmond) are inappropriate for the development of tall buildings. Tall buildings will also normally be unacceptable in Buffer Zone areas (to protect the setting of conservation areas and significant views) and in areas without the required accessibility. Any tall building – within a sensitive or possible area – would furthermore need to comply with the General Design and Evaluation Criteria for Tall Buildings of the London Plan and the following context specific requirements:

1. Not harm the surrounding conservation areas and significant views of the Borough

Any proposal for a tall building would have to show that it does not adversely affect adjacent conservation areas or significant views.

Thus, any proposal for a tall building would need to submit an impact assessment study provided by the developers. This should include the impact on local, medium and long distant views as well as accurate visual modelling of proposals, such as photomontages or three-dimensional computer models. There are also 'home remedies' to show the impact of a tall building on its surroundings and the skyline. When Cambridge University proposed in 1962 to build three high towers on the New Museums site, "a number of balloons were sent up to the heights to which it was proposed to build, so that some probable effects of the buildings could be judged."³² "The specter was scary enough to induce the planning authority to reject the towers."³³

2. Relate to the typical character of the Borough

New developments should relate to the character of the Borough.

To enhance local distinctiveness new developments should respond to local building forms and patterns of development, such as fine urban grain, frequent plot subdivision and street block layout.

Frontages should be established along a regular and continuous building line to create enclosed streets with a clear distinction between public and private spaces.³⁴ Typical eaves lines should be continued.

Frontage, interface and materials should also relate to the local context. Furthermore, buildings should have a clear structure and be composed of a base, body and roof top/crown.

3. Relate to the pedestrian environment and public spaces

The ground level of tall buildings should be highly accessible and improve the quality of the pedestrian environment.

Tall buildings should orientate their fronts and main entrance to the street.

Sufficient openings in the façade should assist overlooking and passive supervision of the street space. Blank walls should be avoided and active frontage promoted. This makes streets feel safer and creates more attractive environments for pedestrians.

The public realm should be enhanced through high quality landscape treatment.

4. Have an outstanding design

Due to their massing and height tall buildings have a strong impact on their environment. Thus, any tall building would need to be of a high quality design. Good quality implies good economics; tall buildings should be durable and adaptable. Slender structures are more likely to be acceptable than bulky structures.

5. Be addressed through an urban design analysis

Any new tall building would need to be set in the context of an urban design analysis and/or masterplan. This should include an evaluation of the contribution to regeneration, sustainability, transport and service infrastructure.

FOOTNOTES

32 T. Sharp in *Town Planning Review*, Jan. 1963, p. 274 in: Spiro Kostof, *The City Shaped*, London 2001, p. 311.

33 Spiro Kostof, *The City Shaped*, London 2001, p. 311.

34 New developments can enhance the local character without necessarily having to replicate historic architectural styles. A contemporary interpretation of the structuring and qualitative aspects of the frontages, spaces, the organisation of the façade and the materials may be found. Usually, following the typical building line, adhering to a similar scale and height, treating the façade with a related degree of detail and subdivision, and employing similar materials can successfully integrate new buildings into a historic context.



In addition to the normal requirements planning applications for tall buildings should consist of:

A design statement including development context, development objectives, urban design principles, scale and massing, density, materials, details, lighting (day and night time), existing and proposed land and building uses, ground floor uses, treatment of roof top/crown, ground floor treatment, public realm strategy.

An impact assessment study to illustrate the impact on the context, especially on conservation areas and significant views. This 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 under different atmospheric conditions.

A tall building statement, including benefits and justifications – such as regeneration, sustainability and city image – for a tall building on the proposed site.

A movement statement (traffic impact assessment including car parking, pedestrian movement and public transport needs).

A building services strategy including building systems and enclosure, energy consumption and efficiency, lighting (day and night time), telecommunications and micro climate (wind tunnel studies, sun path studies, shadowing, privacy and overlooking) and maintenance.

An economic statement including the business case for high buildings, numbers of jobs and impact upon regeneration objectives.