Public Examination of Royal Borough of Kensington and Chelsea's Core Strategy with a focus on North Kensington DPD

Royal Borough of Kensington and Chelsea's
Supplementary Statement to RBKC/11

Matter 9a - Renewing the Legacy

Question 4

Policy CL2 (criteria h – m) provides the Council's general approach to high buildings reflecting the '... relatively modest and consistent height of buildings'. **Is the Policy unduly restrictive and does it take account of the approach to tall buildings in the London Plan?**

This paper shows the relationship between the text of the Submitted Core Strategy and the revised text shown in RBKC/11. *Please note this is prepared in Word using 'comments' in the 'Review' pane. It is easiest to follow by choosing the 'show revisions in balloons' option under 'balloons' (next to the track changes icon).*

The revised text (as in RBKC/11) is shown first, with the paragraph numbers from the Submitted Core Strategy from which the text is drawn. Please note, there may be some minor changes to this text – refer to RBKC/11 to see exactly what new text is inserted within existing paragraphs.

Secondly, the Submitted Core Strategy text is shown, annotated to indicate the paragraph number of the revised text shown in RBCK/11

High Buildings (Revised for Examination in Public) from RBKC/11

34.3.22 The relatively modest and consistent height of buildings within Kensington and Chelsea reflects the primarily residential character of the Borough. High residential densities are delivered within this townscape without recourse to tall buildings. This pattern of development with its low to medium-rise, high-density residential areas has produced a very attractive townscape and is central to the Borough's charm. The Borough has comparatively few tall buildings; the tallest being Trellick Tower at 98m. Tall buildings are very much the exception. Building height is thus a critical issue and a very sensitive feature of the townscape. It is important that the Council carefully manages the height of new development that may otherwise erode the Borough's distinctive townscape character.

> **Comment [P1]:** From 34.3.22 of the Submitted Core Strategy
>
> **Comment [P2]:** New text

34.3.23 High buildings have a greater impact on their environment than other building types, posing problems of microclimate, overshadowing and overlooking. This is especially harmful to residential environments and amenity spaces, and needs to be avoided through careful siting and design (see Policy CL5).

> **Comment [P3]:** New text

34.3.24 High buildings in the wrong location can be visually disruptive. For example, they can harm the character and appearance of a conservation area, the 10 setting of a listed

> **Comment [P4]:** From 34.3.28 of Submitted Core Strategy (at start of paragraph)

building or the visual amenity of important open space; or they can interrupt important views, such as the strategic view from King Henry VIII's Mound (Richmond) to St. Paul's Cathedral, or those identified within the Council's Conservation Areas Proposal Statements or other adopted documents (see Policies CL1, CL3-4 and CR5). One approach to determining the appropriate location of high buildings would be to identify where they are inappropriate. However, such an approach risks inferring that they are therefore appropriate everywhere else, which is mistaken.

34.3.25 It is not enough to ensure that their location avoids causing harm. They should also make a positive intervention in the existing townscape. This is not just a matter of design quality, but also of contributing to townscape legibility. Buildings that rise above the prevailing building height are successful where, depending on their impact, they give meaning to the local or Borough townscape, highlighting locations or activities of public importance.

34.3.26 Local landmarks are occasional features in the Borough which define points of townscape interest or public functions that are relevant to those living or working within the immediate areas. Local landmarks do not necessarily rise above the prevailing building height – for example, the Michelin Building at Brompton Cross – but where they do, they will tend not to be more than 1½ times in height above their context, and remain compatible with their context. Regardless of their location, they should always be of very high design quality and occasional features if they are to retain their meaning.

34.3.27 District landmarks, on the other hand, are visible over wider areas, and tend to highlight major public functions. They can rise to up to 4 times their context in height. They are not characteristic of the Borough, being very occasional features in a borough of predominantly low to medium rise development. Because district landmarks are visible over a much wider area, their location and use must be of significance to the Borough as a whole; and inevitably, they will remain very occasional features. Their location and relationship to the local townscape are of the utmost importance.

34.3.28 Care is needed to ensure that their visibility is assessed contextually to ensure that they have a wholly positive visual impact and do not appear incongruous within their surroundings. A computer generated zone of visual influence, that includes an accurate model of the relevant context, is an essential tool in assessing the visual impact of district landmarks.

34.3.29 On sites where there may be scope for a district landmark, a designled approach is essential. In such cases the Council will promote close working with the stakeholders and, where appropriate, with strategic and neighbouring authorities in the production of an urban design framework that will guide the siting and appropriate height of the building(s), particularly in relation to existing views and to ensuring a wholly positive benefit to the townscape.

34.3.29a Height is not the only factor which is important when assessing high buildings. District landmarks should be of an exceptional quality of architecture, sustainability and urban design. Successful tall buildings possess an architecture that is convincing and highly

attractive, especially when viewed in the round, and that makes for a distinguished landmark on the skyline. This requires the skilful handling of scale, height, massing, silhouette, crown and facing materials and the careful incorporation of building services and telecommunications equipment. The profile and proportion of the building, especially the part which sits above the prevailing building height, is a sensitive feature. Bulky tall buildings are not attractive to look at and disfigure the skyline; slender ones are more successful.

34.3.29b Design quality applies equally to the top, where the impact is on the skyline, as to the base. At lower levels it is not only the impact on the streetscape and local views, but also how the building functionally relates to the street. Successful high buildings are those that create a meaningful public realm, interacting positively with the surrounding buildings and spaces. It includes contributions to permeability and connectivity, defining edges that reinforce existing building lines and give a coherent form to open space, and providing active ground floor frontages and a stimulating and inclusive public realm (see Policies CR1-2).

34.3.29c Very tall buildings – more than 4 times their context – characterise central metropolitan areas, and are thus inappropriate to this Borough.

Policy CL2(h-m) High Buildings

h. resist proposals that exceed the prevailing building height within the context, except where the proposal is for a local or district landmark.

i. require proposed local landmarks to:
      i. be of very high design quality
      ii. be compatible with the scale, rhythm, mass, bulk and character of the context
      iii. articulate positively a point of townscape legibility of local significance.

j. require proposed district landmarks to:
      i. be of exceptional design quality
      ii. be of a slender profile and proportion
      iii. articulate positively a point of townscape legibility of significance for the wider Borough and neighbouring boroughs, such as deliberately framed views and specific vistas
      iv. provide a strategic London-wide public use
      v. require an assessment of the zone of visual influence of a proposed district landmark within or visible from the Borough, to demonstrate that the building has a wholly positive visual impact on the quality and character of the Borough's townscape when viewed from the Royal Borough.

    [text moved from bullet point k.] k. [text moved above, bullet point no-longer required]

l. resist proposals that are of metropolitan scale.

m. require full planning application(s) for all buildings that exceed the prevailing height within the context.

<aside>
Comment [P19]: New text

Comment [P20]: 34.3.27 (end of para) from Submitted Core Strategy

Comment [P21]: New text

Comment [P22]: From 34.3.26 of Submitted Core Strategy

Comment [P23]: From CL2(h) of Submitted Core Strategy, with 'local or district landmarks' added.

Comment [P24]: From CL2(h)(iii) of Submitted Core Strategy – except 'downgraded' to very high from exceptional

Comment [P25]: From CL2(i)(i) of Submitted Core Strategy

Comment [P26]: From CL2(i)(ii) of Submitted Core Strategy

Comment [P27]: From CL2(h)(iii) of Submitted Core Strategy

Comment [P28]: From CL2(h)(ii) of Submitted Core Strategy

Comment [P29]: From CL2(j)(i) of Submitted Core Strategy

Comment [P30]: From CL2(j)(ii) of Submitted Core Strategy

Comment [P31]: From CL2(k) of Submitted Core Strategy

Comment [P32]: From CL2(l) of Submitted Core Strategy

Comment [P33]: From CL2(m) of Submitted Core Strategy
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Policy in the Submitted Core Strategy

This section of this paper shows where sections of the reasoned justification and policy move to in the revised policy contained in the RBKC statement in response to Matter 9a Question 4. Please note that there may be detailed wording changes between the submitted text and the revised text that are not shown in this block-by-block analysis.

High Buildings

34.3.22 The relatively modest and consistent height of building within Kensington and Chelsea reflects the primarily residential character of the Borough. High residential densities are delivered within this townscape without recourse to tall buildings and this pattern of development with its medium-rise, high-density residential areas has produced a very attractive townscape, and is central to the Borough's charm. Given its central location, the Borough has comparatively few tall buildings, the tallest being Trellick Tower at 98m. Tall buildings are therefore very much the exception. Building height is thus a critical issue and a very sensitive feature of the townscape.

> **Comment [P34]:** Goes to 34.3.22 of revised text shown in RBKC/11, Question 4

34.3.23 One approach to determining the appropriate location of high buildings would be to identify where they are not appropriate - such as in Conservation Areas. However, such an approach risks inferring that they are therefore appropriate anywhere else. ~~That would not be an appropriate approach because~~Higher buildings should ~~must~~ only be located where - depending on their impact - they give meaning to the local or Borough townscape.

> **Comment [P35]:** Goes to 34.3.24 of revised text shown in RBKC/11 Question 4

> **Comment [P36]:** Goes to 34.3.25 of revised text shown in RBKC/11 Question 4

34.3.24 Local landmarks define points of townscape interest or public functions that are relevant to those living or working within the immediate areas. They do not necessarily rise above the predominant building height ~~line~~ - such as the Michelin Building at Brompton Cross - but where they do, they will not tend to be more than 1½ times in height above the context, and as such are compatible with their context.

> **Comment [P37]:** Goes to 34.3.24 of revised text shown in RBKC/11 Question 4

34.3.25 District landmarks, on the other hand, are visible over wider areas, and tend to highlight major public functions. They can rise to up to 4 times their context in height.

> **Comment [P38]:** Goes to 34.3.27 of revised text shown in RBKC/11 Question 4

34.3.26 Very tall buildings, more than 4 times their context, characterise central metropolitan areas and are thus inappropriate to this Borough.

> **Comment [P39]:** Goes to 34.3.29c of revised text shown in RBKC/11 Question 4

34.3.27 ~~Height is one of several factors which are important when assessing high buildings. The profile and proportions of the building where it sits above the prevailing building height are very important.~~ Height is not the only factor which is important when assessing high buildings. The profile and proportion of the building, especially the part which sits above the prevailing building height, is also a sensitive feature. Bulky tall buildings are not attractive to look at and disfigure the skyline.

> **Comment [P40]:** Goes to 34.3.29a of revised text shown in RBKC/11 Question 4

34.3.28 High buildings in the wrong location can interrupt views that are important in the townscape, both those identified within the London Plan or within the Council's Conservation Area Proposal Statements or other adopted documents. It is not enough, however, to ensure that their location avoids this. They should make a positive intervention in the existing townscape. Because district landmarks are visible over a wider area, their location must be of significance to the Borough as a whole, and they will therefore be exceptional. Their location and ~~the townscape sensitivity~~ relationship to the local townscape are therefore of the utmost importance.

> **Comment [P41]:** Goes to 34.3.25 of revised text shown in RBKC/11 Question 4

> **Comment [P42]:** Goes to 34.3.27 of revised text shown in RBKC/11 Question 4

34.3.29 Care is also needed to ensure that their visibility is assessed ~~in the round~~ contextually to ensure they do not appear in incongruous with their context. A computer generated zone of visual influence, that includes an accurate model of the relevant context, is an essential tool in assessing the visual impact of district landmarks.

Policy CL 2

New Buildings, Extensions and Modifications to Existing Buildings

The Council will require new buildings, extensions and modifications to existing buildings to be of the highest architectural and urban design quality, taking opportunities to improve the quality and character of buildings and the area and the way it functions.

To deliver this the Council will, in relation to: [inter alia]

High Buildings

h. resist a proposal that exceeds the prevailing building height within the context, except where the proposal is:
   i. of a slender profile and proportion; and
   ii. not within any identified linear views; and
   iii. of exceptional design quality;

i. require a proposed local landmark to:
   i. be compatible with the scale of its context; and
   ii. articulate positively a point of townscape legibility of local significance;

j. require a proposed district landmark to:
   i. articulate positively a point of townscape legibility of significance for the wider Borough and neighbouring boroughs, such as deliberately framed views and specific vistas; and
   ii. ii. provide a strategic London-wide public use;

k. require an assessment of the zone of visual influence of a proposed district landmark within or visible from the Borough, to demonstrate that the building has a wholly positive visual impact on the quality and character of the Borough's or neighbouring boroughs' townscape when viewed from the Royal Borough;

l. resist a proposal that is of a metropolitan scale;

m. require a full planning application for ~~a proposed district landmark~~ all proposed high buildings;