

Earls Court Regeneration Area

Core Strategy Evidence Base: Townscape and Tall Buildings Summary Study

Professor Robert Tavernor Consultancy, June 2009

Tavernor

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1.0 Key point summary

- 1.1 This Study has been prepared by the Professor Robert Tavernor Consultancy. It considers the townscape context and the potential for the Earls Court Regeneration Area to accommodate tall buildings.
- 1.2 Any development coming forward within the Regeneration Area would achieve high levels of urban design and architectural treatment respecting its townscape context. A masterplan and subsequent scheme would be worked up within established policy guidance and the terms of recognised good practice, consistent with planning policy. The masterplan would consider layout principles, urban grain, massing envelopes, architectural typologies and urban form and would identify the specific parts of the Regeneration Area where tall buildings are appropriate.
- 1.3 It is recognised that tall buildings can be a sustainable response to accommodating growth and to achieve high density development.
- 1.4 The study concludes that the Earls Court Regeneration Area can be an appropriate location for tall buildings. The main reasons include:
 - Due to its size and accessibility there is scope for the Regeneration Area to establish its own architectural identity and accommodate tall buildings;
 - The Regeneration Area provides the opportunity to deliver a new economic cluster of related activities. Tall buildings are in principle supported in such locations by planning policy;
 - Tall buildings, as a coherent and integral part of a masterplan for the Regeneration Area ,could act as a catalyst for regeneration, renewal and economic activity in their own right, consistent with planning policy objectives; and
 - Tall buildings would mark the Regeneration Area as a destination in its own right and contribute to the skyline of London as a whole.

2.0 Introduction

- 2.1 The Professor Robert Tavernor Consultancy has produced this Townscape and Tall Buildings Summary Study for Capital & Counties on behalf of the Earls Court & Olympia Group. It considers how any regeneration scheme within the Earls Court Regeneration Area could be developed within the context of the local and wider townscape. The assessment is made in the context of the Earls Court Regeneration Area Framework (June 2009) prepared by Urban Strategies Inc.

- 2.2 This study considers the existing built environment of the Earls Court Regeneration Area; listed buildings and conservation areas within the surrounding area; existing and consented large-scale development on and close to the Regeneration Area; and relevant national, regional and local planning policy. This study considers the potential suitability of the Regeneration Area to support tall buildings, and identifies further work that will be undertaken.

3.0 The Earls Court Regeneration Area in its Urban Context

- 3.1 The 27 ha Earls Court Regeneration Area straddles the boundary between the Royal Borough of Kensington & Chelsea (RBKC) and the London Borough of Hammersmith and Fulham (LBHF). It is bordered by West Cromwell Road (the A4) to the north, Philbeach Gardens, Warwick Road and Eardley Crescent to the east, the Old Brompton Road to the south and North End Road to the west. A railway line set into a cutting creates a man-made barrier running north-south which has restricted development along it. This condition is exacerbated within the Regeneration Area by railway sidings, which have created an urban wasteland and a backdrop to surrounding habitation.
- 3.2 The Earls Court Regeneration Area is set within an area that is primarily housing, interspersed with local shops and other commercial activities. Residential Victorian terraces and crescents with tree lined streets and squares are set around the Regeneration Area, and contrast with the Regeneration Area's much larger physical urban statement and more open grain. These streets contain buildings of architectural and urban quality. To the east, in RBKC, the Victorian terraces of Philbeach Gardens and Eardley Crescent overlook the vacant land beside the railway line. To the south, Lillie Road is lined with low rise commercial properties. To the west is the Clem Atlee housing estate, and terraces of shops and houses along North End Road. To the north, the A4 corridor, one of the principal arterial routes into central London, cuts through the residential streets and is flanked primarily by large scale offices and commercial buildings.
- 3.3 The Earls Court Regeneration Area benefits from good accessibility and is served by three LU Underground stations – Earls Court, West Brompton and West Kensington – and one overground station at West Brompton. The A4 runs east west along its northern edge. As a major transportation interchange it has led to a clustering of large and tall buildings.
- 3.4 Since the late 1930s the Regeneration Area has been dominated by the large mass of the barrel vaulted roof of the Earls Court Exhibition Centre and, since the 1960s, the tall Empress State Building. Earls Court Exhibition Centres 1 and 2 are located on the east side of the Regeneration Area in RBKC. They rise to the equivalent of 18 storeys in height. To the west, in LBHF, is the 31 storey Empress State Building, which is occupied by the Metropolitan Police Service. Beyond are two housing estates, West Kensington and Gibbs Green, which primarily comprise low-rise accommodation, though the larger scale blocks of the adjacent Clem Atlee Estate rise to 11 storeys. The roads within the housing estates connect the Regeneration Area to the adjacent residential townscape.

Existing and consented tall buildings in the surrounding area

- 3.5 The Empress State Building is located on the LBHF part of the Regeneration Area and is currently the tallest building in the locality, and is a prominent landmark. It was built in 1961 and was 100m tall with 28 floors until renovated and extended in 2003 by three floors: 17.3m were added to its height. Not only is it tall, but its triangular plan form with concave curtain walls creates a distinctive broad silhouette on the skyline.
- 3.6 Proposals for three developments along Warwick Road, to the north east of the Earls Court Regeneration Area, were approved by RBKC in 2008. The Territorial Army Centre at 245 Warwick Road will be replaced by a complex of four residential buildings, 9-11 storeys high. Four residential buildings of 7-17 storeys have also been consented on the Telephone Exchange site at 213-215 Warwick Road. At 181-183 Warwick Road, a hotel and residential development will reach 11 storeys in height.

Conservation areas and listed buildings in the surrounding area

- 3.7 Earls Court Regeneration Area is not situated in a conservation area and there are no listed buildings within the site. However, a number of conservation areas are clustered in the vicinity in RBKC and LBHF. They are shown in Figure 3.7 of the Framework document.
- 3.8 Adjacent to the east side of the Regeneration Area are the crescents of Philbeach Gardens and Eardley Crescent that comprise the Philbeach Gardens Conservation Area, and within it the Grade II* Listed St. Cuthbert's Church. These Victorian terraces are three storeys tall and are closely set and consequently largely obscure views beyond.
- 3.9 Hugh Roumieu Gogh's St Cuthbert's Church was built towards the end of the Victorian church-building boom in Kensington. Its "*rich interior*", as described in English Heritage's Listing citation, provides its primary architectural and historic interest. The setting of its Gothic pitched roof and fleche, and the white stucco adjacent terraces would be considered carefully in relation to any masterplanning exercise.
- 3.10 Development within the Regeneration Area would potentially be visible along the axes of Nevern Square and Earls Court Square: the Empress State building can already be seen from within these conservation areas. A regeneration scheme coming forward of high architectural quality and easily differentiated from the historic context would aim to avoid harm to the setting of historic buildings in the foreground.
- 3.11 Further east, other conservation areas are also characterised by low rise Victorian and Georgian terraces set in formal square and crescents. At the southeastern corner of Nevern Square Conservation Area, the Grade II Listed Earls Court Station fronts Earls Court Road. Its buff and green faience facade was built to the designs of Harry Ford in 1906 and was extended west to Warwick Road in 1937, here with a brown brick entrance. The ornate

central train shed was built in 1878 by John Wolfe Barry. The station is a low structure of two storeys surmounted by a short balustrade.

- 3.12 To the southeast of the Regeneration Area and the Old Brompton Road is the open space of Brompton Cemetery. It is one of seven Royal Parks as well as a RBKC conservation area. Any development within the Regeneration Area would be potentially seen beyond the western boundary of the cemetery. This side of the cemetery is more open and, as acknowledged by RBKC in their Conservation Area Statement, is of less architectural interest. It also lacks the mature trees that create the sense of enclosure and channelled vistas enjoyed in the eastern side of the cemetery. The undistinguished grey roof of the Earls Court Exhibition Centre can be seen at present from the Great Circle. A regeneration scheme would provide the opportunity to replace the exhibition centre with a landmark of improved quality that will potentially enhance the already distinctly urban setting of the cemetery.
- 3.13 To the west of the Regeneration Area in LBHF, a mixture of simple Victorian terraced housing and shops and 20th century residential blocks predominate. The closest conservation areas are Sedlescombe Road to the southwest; Turneville/Chesson and Queens Club Gardens to the west; and Baron's Court to the northwest bordering the A4 corridor. The residential streets in this area run largely parallel, from the southwest to the northeast, towards the Regeneration Area and the Empress State building. Modern housing estates to the west in LBHF are also visible in views along these residential streets. The open spaces of the Queens Club grounds and Hammersmith Cemetery are not on the Register of Parks and Gardens of Special Historic Interest but are located within Conservation Areas.
- 3.14 A cluster of conservation areas – the Gunter Estate, Fitzgeorge and Fitzjames, and Olympia – to the north of the A4 also contain low rise Victorian terraces. The topography of the area affords glimpses of buildings to the south: the Olympia building, which is itself listed, as well as the larger offices and commercial buildings that run along West Cromwell Road provide this area with a distinctly urban setting. Visually, they sever the residential streets of the conservation areas from those to the south of the A4, itself a significant east-west physical barrier.
- 3.15 The setting of conservation areas in the distant surrounding area would also need to be taken into consideration when developing a masterplan for the Regeneration Area. In particular, the open areas of Holland Park and Kensington Gardens to the northeast are both on the Register of Parks and Gardens of Special Historic Interest and are RBKC Conservation Areas. Buildings can be seen beyond the perimeters of both of these protected spaces at present. Tall buildings within the Regeneration Area would be expected to preserve or enhance that urban setting.

4.0 Planning Policy Context

National Planning Policy

Planning Policy Statement 1 (PPS1) – Delivering Sustainable Development (2005).

4.1 Paragraphs 13 and 34 are particularly pertinent to design. Paragraph 13(iv) states that:

“Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted (see paragraphs 33-39 below).”

And at paragraph 34 it is stated that:

“Planning authorities should 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 contribute positively to making places better for people. 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.”

4.2 Objective criteria set out in *By Design* (and set out below) are endorsed in *PPS1* as they provide an objective framework by which to assess urban design proposals. Any development coming forward within the Regeneration Area would be assessed in relation to these criteria.

Planning Policy Guidance Note 15 (PPG15) – Planning and the Historic Environment (1994)

4.3 *PPG15* provides a full statement of government policies for the identification and protection of historic buildings, Conservation Areas and other elements of the historic environment. There is a general Government commitment to preserve the historic environment. It explains that the objective of planning processes should be to reconcile the need for economic growth with the need to protect the natural and historic environment (paragraph 1.2).

4.4 Paragraph 4.14 of *PPG15* provides that special attention shall be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a Conservation Area. This requirement extends to all powers under the Planning Acts, not only those that relate directly to historic buildings. The desirability of preserving or enhancing the area should also, in the Secretary of State's view, be a material consideration in the

planning authority's handling of development proposals that are outside the Conservation Area but would affect its setting, or views into or out of the area.

4.5 The setting of Listed Buildings and Conservation Areas is referred to at paragraph 2.16:

“Sections 16 and 66 of the Act require authorities considering applications for planning permission or listed building consent for works which affect a listed building to have special regard to certain matters, including the desirability of preserving the setting of the building. The setting is often an essential part of the building's character [...]”.

4.6 The presumption to *"preserve and enhance"* conservation areas and their settings is elaborated at paragraphs 4.19 and 4.20 of *PPG15*:

“4.19 The Courts have recently confirmed that planning decisions in respect of development proposed to be carried out in a conservation area must give a high priority to the objective of preserving or enhancing the character or appearance of the area. If any proposed development would conflict with that objective, there will be a strong presumption against the grant of planning permission, though in exceptional cases the presumption may be overridden in favour of development which is desirable on the ground of some other public interest.

4.20 As to the precise interpretation of 'preserve or enhance', the Courts have held (South Lakeland DC v Secretary of State for the Environment, [1992] 2 WLR 204) that there is no requirement in the legislation that conservation areas should be protected from all development which does not enhance or positively preserve. Whilst the character and appearance of conservation areas should always be given full weight in planning decisions, the objective of preservation can be achieved either by development which makes a positive contribution to an area's character or appearance, or by development which leaves character and appearance unharmed.”

By Design. Urban design in the planning system: towards better practice (DETR/CABE, 2000)

4.7 *By Design* is cited as an important reference document when assessing tall buildings, and is endorsed by *PPS1* as it provides an objective framework by which to assess urban design proposals and lists seven criteria against which urban design proposals should be judged. The criteria are listed below as seven separate headings.

i) **Character.** *A place with its own identity. To promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture.*

ii) **Continuity and Enclosure.** *A place where public and private spaces are clearly distinguished. To promote the continuity of street frontages and the enclosure of space by development which clearly defines private and public areas.*

iii) **Quality of the Public Realm.** *A place with attractive and successful outdoor areas. To promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including disabled and elderly people.*

iv) **Ease of Movement.** *A place that is easy to get to and move through. To promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport.*

v) **Legibility.** *A place that has a clear image and is easy to understand. To promote legibility through development that provides recognisable routes, intersections and landmarks to help people find their way around.*

vi) **Adaptability.** *A place that can change easily. To promote adaptability through development that can respond to changing social, technological and economic conditions.*

vii) **Diversity.** *A place with variety and choice. To promote diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs.*

Guidance on Tall Buildings (EH/CABE, July 2007)

4.8 The *EH/CABE Guidance on Tall Buildings* (July 2007) is intended to provide advice and guidance on good practice in relation to tall buildings in the planning process and to highlight other related issues that need to be taken into account. It sets out how CABE and English Heritage will evaluate proposals for tall buildings. CABE and English Heritage recommend that local authorities should use it as a basis for their own consideration of such projects. There are overlaps in approach that mesh this guidance with *By Design*.

4.9 It is stated at paragraph 3.3 of the Guidance that:

“All proposals for tall buildings should be accompanied by accurate and realistic representations of the appearance of the building. These representations should

show the proposals in all significant views affected, near, middle and distant, including the public realm and the streets around the base of the building. This will require methodical, verifiable 360 degree view analysis. Where a tall building is justified by its relationship to a cluster, the proposals should be illustrated in the context of proposed and approved projects where this is known, as well as the existing situation.”

Any submissions made through the planning application process would adopt this methodology.

- 4.10 Additional criteria for the evaluation of tall buildings are set out at paragraph 4.1 of the Guidance, and it is stated that applicants seeking planning permission for tall buildings should ensure that the following eleven criteria are fully addressed:

4.1.1 The relationship to context

4.1.2 The effect on the historic context

4.1.3 The effect on world heritage sites

4.1.4 The relationship to transport infrastructure

4.1.5 The architectural quality of the building

4.1.6 The sustainable design and construction of the proposal

4.1.7 The credibility of the design, both technically and financially

4.1.8 The contribution to public space and facilities

4.1.9 The effect on the local environment

4.1.10 The contribution made to the permeability of a site and the wider area

4.1.11 The provision of a well-designed environment.

Regional Planning Policy

The London Plan (GLA, 2008)

- 4.11 Policy 4B.1 is concerned with the principles of design for a compact city; 4B.2, promoting world-class architecture and design; 4B.3, enhancing the quality of the public realm; 4B.5, creating an inclusive environment; and 4B.8, respecting local context and communities. Policy 4B.9, is concerned with tall buildings and their location, and is linked to policies 3A.3 which states that development proposals should achieve the maximum potential of sites in terms of

development and policies 4B.1 and 4B.10. The latter policy relates to the impact of large-scale buildings. Policies 4B.11 and 4B.12 outline guidance for the protection for London's heritage.

- 4.12 The LP designates strategically important views (policy 4B.16) which are managed through the London View Management Framework (LVMF). Policy 4B.18 requires development proposals within the assessment areas of designated views to be assessed against the general principles of good design.
- 4.13 Policy 4B.9 of *The London Plan, Tall Buildings – location*, 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.*" (p. 252).
- 4.14 The London Plan recognises that "*tall buildings can be a very efficient way of using land and can make an important contribution to creating an exemplary, sustainable world city. They can support the strategy of creating the highest levels of activity at locations with the greatest transport capacity. Well-designed tall buildings can also be landmarks and can contribute to regeneration and improve London's skyline*" (para 4.121, p. 253).
- 4.15 To this end, Policy 4B.10, *Large-scale buildings - design and impact*, requires that tall buildings must "*be of the highest quality design*". Policy 4B.10 also requires that tall and large scale buildings relate positively to their local and wider context in terms of appearance, environmental sensitivity, amenity, security, accessibility and local transport capacity. Furthermore, Policy 4B.10 requires that all large-scale buildings, including tall buildings should "*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*" and should 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*" (p. 253).
- 4.16 The Earls Court Regeneration Area does not fall within the viewing corridors of any of the protected vistas designated in the LVMF SPG (July 2007) and the revised draft replacement document issued recently (July 2009) for consultation.

Local Planning Policy

London Borough of Hammersmith and Fulham UDP (amended 2007)

- 4.17 The LBHF UDP was adopted in 2003 and amended in September 2007. It sets out the Borough's framework for development control and conservation. A number of policies relating to the protection and enhancement of the Borough's built environment will need to be considered when forming development proposals for the Earls Court Regeneration Area.
- 4.18 Policy EN2B relates to the *"Effect of development on the setting of conservation areas and views into and out of them."* Following PPG15, Policy EN2B stipulates that development within and outside of conservation areas will only be permitted if the character, appearance and setting of the conservation areas is preserved or enhanced. It states that: *"Views are a key element in the townscape and setting of conservation areas, and in the definition of their special character. Development should not negatively impact upon the quality of important views by obscuring them, introducing inappropriate elements to the foreground or affecting the townscape composition within. Important views in conservation areas are defined in the relevant Conservation Area Character Profile."*
- 4.19 UDP Policy EN31 protects *"Important views along, across, and from, the river"* as well as views of key landmarks within LBHF. Policy EN9 on High Buildings is struck through in the amended 2007 UDP and is no longer to be taken into account in the formation of proposals for the Regeneration Area.

London Borough of Hammersmith and Fulham Emerging Local Development Framework

- 4.20 The London Borough of Hammersmith and Fulham consulted on its Preferred Options on the Core Strategy and Site Allocations from June to August 2007. LBHF has recently published for consultation its Core Strategy Options, June 2009 which continues until mid July 2008. The borough currently expects adoption of the final Core Strategy in early 2011.
- 4.21 The Core Strategy Options sets out key priorities for delivering the spatial vision for Hammersmith and Fulham, these include:
- Promoting home ownership
 - Regenerating the most deprived parts of the borough
 - A top quality education for all – schools of choice
 - Setting the framework for a healthy borough

- Tackling crime and anti-social behaviour
- Creating a cleaner, greener borough
- Delivering high quality, value for money public services

4.22 The Core Strategy sets out a preferred option for the Regeneration Area. This preferred option seeks comprehensive development for a mix of uses, including residential, employment, hotel, leisure and office uses. The Regeneration Area is envisioned as a vibrant world class new urban quarter and as part of this the Core Strategy supports tall buildings. In describing the key objectives and principles for the Regeneration Area, the Core Strategy states that "Building design should be of the highest quality and, subject to that, there could be some scope for tall buildings. Design must take account of the local context, local conservation areas, and local views" (Section 8, page 85).

Royal Borough of Kensington and Chelsea UDP (amended 2007)

- 4.23 The RBKC UDP was adopted in 2002 and amended in September 2007. A number of policies relate to conservation and development that will need to be considered by proposals which might evolve within the Regeneration Area.
- 4.24 Policy CD27 requires that development within the Borough is of a high design quality and sensitive to the massing, height, material and character of existing development within the surrounding area. It does not preclude large scale or tall development but stipulates that the policy *"is intended to reinforce and enhance the traditional urban pattern of the Royal Borough"* by *"maintaining free movement, particularly of pedestrians"*, by improving the legibility of the townscape by *"preserving or creating features"* and by creating streets that are *"visually interesting and secure"* through the use, appearance and lay out of new development (paragraph 4.3.4). The same high standard of landscape design and quality of open spaces is also required of all new development (Policy CD38).
- 4.25 New development is also required *"to be physically and visually integrated into its surroundings"* (Policy CD28). Emphasis is placed on accessibility, through the preservation and improvement of routes within, and to and from, the Borough. New built forms should be designed so as to relate to the existing building lines and to maintain or enhance the enclosure of spaces, the legibility of access routes and main roads and the definition of key points of retail or civic value within the Borough. Policy CD28 also requires that development preserves or creates a built environment that *"contributes to local distinctiveness and character"* (CD28.d).

- 4.26 Policy CD37 on tall buildings has been struck through in the amended 2007 UDP, and a draft SPD has been issued by RBKC.
- 4.27 Policies CD57 outline RBKC's requirements for new development in relation to conservation areas and their settings. Following PPG15, the Policy stipulates that special attention must be made to the "*desirability of preserving or enhancing the character or appearance of each conservation area*".
- 4.28 Policy CD63 requires that new development take into account the potential impact on views within conservation areas, identified by RBKC within Conservation Area Character Statements, and considers "*the effect of development on sites adjacent to such areas*". Similarly, Policy CD69 states that RBKC will "*resist development which would adversely affect the setting of a listed building*". Special protection is given to the protection of the setting of Holland Park in Policy CD15 and to the protection and enhancement of RBKC's cemeteries, including Brompton Cemetery.

Royal Borough of Kensington and Chelsea Local Development Framework

- 4.29 The RBKC emerging core strategy outlines the principles behind the planning framework for RBKC and identifies specific development sites and their uses. The strategic objectives of the core strategy are to: keep life local, foster vitality, care for the public realm, renew the legacy, achieve diversity in housing, and secure our children's future.
- 4.30 In 2008 RBKC issued for consultation Towards Preferred Options as part of the core strategy. This document identified the Earls Court Regeneration Area as a broad location for development and regeneration and also a possible area for tall building development. The document referred to ongoing work to produce a tall building SPD. It cited an indicative policy direction pending the SPD permitting tall buildings where they do not cause harm to valued historic environments, contribute positively to urban legibility and public realm, have good public transport access and they are of outstanding architecture.
- 4.31 The Borough is now consulting on a series of places and strategic sites that are central to achieving the strategic objectives of the Core Strategy. It has identified 14 "places" requiring specific attention to place-making and integration of strategic objectives. The wider Earls Court area, of which the Earls Court Regeneration Area is part, is one such place. It is specifically considered to be one of seven areas of regeneration considered to have the greatest potential for significant new development to assist in meeting, for example, the borough's strategic housing targets.
- 4.32 The Earls Court 'place' is described as largely residential and predominantly Victorian building stock (5.1.1) but also home to one of the most important entertainment and exhibition centres

in the capital fulfilling both a local and a London wide role. The public transport connections are identified as a key attribute to the area but the one-way system is of significant detriment to the pedestrian experience in the local streets. Public open space is seen to be lacking with the exception of the Brompton Cemetery.

- 4.33 The 'vision' outlined for the area is one of reducing and improving traffic flow so that Earls Court town centre will become a greater draw and an "urban-village" environment can develop. The community infrastructure would continue to support a large residential community whilst the exhibition centre would be redeveloped retaining its important London wide function, drawing more visitors to this gateway location at the A4's arrival in Central London. The aim is also to improve pedestrian movement across the A4/ West Cromwell Road and reconnect the residential communities to the north and south of this busy thoroughfare.
- 4.34 In relation to heritage considerations for the Earls Court 'place', the Listed Earls Court Station and Church of St Cuthbert on Philbeach Gardens are specifically mentioned. Reference is made to a number of listed buildings and conservation areas in the area.
- 4.35 The portion of the Regeneration Area located within Kensington and Chelsea has also been designated a Strategic Site, meaning its development is considered by RBKC to be central to the achievement of strategic objectives for both the wider area and the Core Strategy itself.
- 4.36 A brief delivery strategy has been proposed for the Regeneration Area which identifies continued exhibition centre uses and / or convention centre use, with additional potential for office (10,000 sq m) and residential (300 units) uses. The borough would also support:
- significantly more residential and potentially additional office accommodation, subject to improved accessibility to the site;
 - an ICC on the site as part of a mixed use development;
 - waste management facilities of the size required to meet the GLA's requirement, if other alternatives are not available.

Royal Borough of Kensington and Chelsea Tall Buildings Draft SPD (October 2008)

- 4.37 The Tall Buildings draft SPD has been through consultation and is expected to be adopted shortly.
- 4.38 The SPD analyses the existing built fabric of RBKC. It aims to provide guidance on the suitability of sites for tall buildings and an appropriate scale for tall building proposals. It defines different categories of tall buildings, describes existing tall buildings in the Royal

Borough and identifies locations within the Borough where new tall buildings might be appropriately sited. It recognises that tall buildings can achieve high densities and maximise the potential of sites, particularly near major transport interchanges.

- 4.39 The draft SPD claims that tall buildings would not relate to the predominantly residential character and low-rise buildings of RBKC. Drawing on its analysis of the local architectural styles and existing tall buildings in the borough, the draft SPD cites existing 8-storey mansion blocks as an alternative model of high-density development (1.9) and rules out buildings of a height similar to the Grade II* Listed Trellick Tower, views of which it seeks to protect (Views LV10 and LV11, p.28).
- 4.40 The guidance proposes buffer zones around its conservation areas in order to protect the character and appearance of these areas and their settings. It states that tall buildings within the buffer zones are very likely to affect the setting of a conservation area and would normally be resisted. This approach is contrary to the spirit and detail of existing national and regional policy. PPG15 requires proposals to be assessed against relevant tests, most notably whether or not they cause harm. Tall buildings, appropriately sited and designed so as to relate to the surrounding townscape could potentially enhance the urban setting of a conservation area. This has been acknowledged by the Secretary of State in relation to recent planning decisions.
- 4.41 The draft SPD recognises that high density development may be appropriate around public transport nodes, identifying Earls Court, West Brompton and West Kensington stations as such locations and states that this may take the form of tall buildings.
- 4.42 It also recognises that stand alone or clusters of landmark buildings may be appropriate at gateways along the western border of the borough. The draft SPD refers to the physical barriers particularly railway corridors and the heavily trafficked entrance routes in to the borough that have lead to a poor urban environment. It suggests that "*Landmarks could enhance such border zones by emphasizing the gateways into central London*" (4.46). Figure 9 of the document identifies road and rail intersections along the western border – 'major gateways'.
- 4.43 Policy TB16 (p.41) states that "*Gateways along the western border could be marked by stand alone or clusters of 'district landmarks' which should be no taller than 3 – 4 x (45-60m or 148-197ft) the typical building height of their surroundings*". The guidance proposes a height limit at four times the perceived typical 15m height of a Victorian/ Georgian street in RBKC (see Figure 2), although this definition has no foundation in national or regional policy and, as shown in the response submitted by Capital & Counties on the draft SDP, is without a sound evidence base.

- 4.44 The draft SPD acknowledges that high density development with more mixed and intensive uses can have regeneration benefits, but at odds with the LP, questions if tall buildings act as a catalyst. The guidance advocates tall buildings should only be located where there is a strong argument for sustainability, accessibility and improvement of city image (policy TB18).
- 4.45 The draft SPD concludes by identifying areas that are:
- inappropriate for tall buildings – conservation areas, protected metropolitan view corridors, areas outside ,major transport node and corridors;
 - highly sensitive areas for tall buildings – buffer zones for conservation areas, backdrops of London panoramas, river prospects and landmark views; and
 - possible areas for tall buildings – gateways and non sensitive sites.
- 4.46 The document identifies two potential sites suitable for tall buildings: Westbourne Park Station and Latimer Road (at paragraph 4.48, and Fig. 10). The suitability of these sites is judged by RBKC on the basis of their border location, good transport links and lack of conservation areas in the close vicinity. The policy states that tall buildings will not be accepted outside these locations.
- 4.47 The EC Regeneration Area is a gateway site but it also falls within a buffer zone. Under the draft guidance the portion of the site within RBKC is considered highly sensitive for tall buildings. As a consequence, RBKC would expect new development on the site to be below 45m in height. This appears to contradict the key diagram in the Towards Preferred Options document which identifies the Regeneration Area as a possible location for tall building development.

5.0 The case for tall buildings within the Earls Court Regeneration Area

5.1 The EC Regeneration Area has been identified as a strategic development site by both boroughs in their respective Core Strategies and the indicative the Land Use Budget promotes a high density mixed use scheme. The Regeneration Area is well served by public transport. The draft SPD describes the area as a major transport interchange and accessibility to and through the site could be enhanced as a result of a well conceived masterplan. It is recognised in national, regional policy and the draft SPD that tall buildings can be a sustainable response to accommodate growth and achieve high density development.

5.2 The LP requires various factors to be taken into account when assessing tall building proposals. These criteria provide a useful basis on which to assess the suitability of a site for a tall building. They embrace location and other policy considerations. The Regeneration Area is assessed against these factors below and shown to meet the policy objectives. A number of the policy considerations relate to particulars of a scheme design and its potential impact and are not, therefore, specifically addressed in this study.

5.3 Tall buildings are promoted where they:

(a) create attractive landmarks

The draft SPD recognises that landmark development can enhance gateway locations particularly in border zones along the borough's western boundary. The Earls Court Regeneration Area is at a gateway location on a key arterial route into central London, at an important transport interchange and is appropriately positioned for landmark development. Development would be expected to achieve high standards of architectural quality and for new buildings and their settings. The particular circumstances of the Regeneration Area – its broad expanse, cross boundary location and varied local setting will encourage architectural variation in height, scale and style providing scope for an attractive landmark.

(b) help to provide a coherent cluster of related activities

The draft SPD refers to existing tall buildings in the borough of RBKC being clustered along main transit corridors, e.g. by railway cuttings or around central nodes. Development in the range of the indicative Land Use Budget could establish a new urban quarter creating a commercial mixed use hub and an appropriate setting for a grouping of tall buildings

(c) act as a catalyst for regeneration

The rationale for developing the Regeneration Area is underpinned by regeneration objectives. It is at present an underutilised site in an area experiencing significant pressure to find new employment and housing opportunities. It is identified by RBKC as an area of

regeneration having the greatest potential for significant new development, assisting the borough to meet its strategic housing targets. Tall buildings would mark the Regeneration Area as a destination in its own right and contribute to the regeneration and skyline of London as a whole. The EH/CABE guidance acknowledges at the outset that tall buildings “*can be excellent works of architecture in their own right; some of the best post-war examples are now listed buildings, individually, or in groups, they affect the image and identity of the city as a whole. In the right place they can serve as beacons of regeneration, and stimulate further investment*” (para 1.1).

(d) achieve maximum density compatible with local context, public transport capacity, sustainable residential quality

The indicative Land Use Budget provides the opportunity to achieve a high density scheme which responds to its local context. The regeneration scheme will take into account the excellent accessibility of the site and potential for future transport improvements and will deliver a significant amount of new housing with a range of housing tenures creating a sustainable new community.

(e) maximise potential of sites

Tall buildings within the Regeneration Area would enable its potential to be maximised.

(f) promote inclusive design and create or enhance the public realm

A regeneration scheme will provide the opportunity to create new areas of open space and improve connections to existing amenity areas, forming a new network of linked open spaces. Increasing permeability through the Regeneration Area and the public realm strategy will be an integral part of any masterplan. Tall buildings can realise efficient use of land freeing up open space opportunities and, in the appropriate place, a well designed tall building can improve the public realm.

(g) respect local context, history, built heritage, character and communities

The site is not within a conservation area but there are several nearby and it lies within the buffer zone proposed in the draft RBKC SPD. The borough regards areas near conservation areas, historic buildings and spaces as highly sensitive to the location of tall buildings, hence designation of the proposed buffer zones. PPG15, however, sets out the test in relation to the notion of harm. This test has been debated at public inquiry and it has been accepted in recent Secretary of State decisions that the introduction of tall buildings does not necessarily harm the settings of conservation areas or even listed buildings of national importance such as St Paul’s Cathedral or World Heritage Sites such as the Tower of London and the Palace of Westminster. Such points were accepted when planning permission was granted at Lots Road Power Station for 25 and 36 storey buildings on a site also straddling RBKC and LBHF.

The evolving policy should take into account guidance in PPS1 and By Design. The latter states “*relating new development to the general pattern of building heights should not preclude a degree of variety to reflect particular circumstance*” (para 4.2).

The potential impact of tall buildings located within the Regeneration Area on historic buildings and sensitive views will be assessed through any masterplanning process. Tall buildings have the potential for enhancing the skyline and reinforcing the urban context of Conservation Areas within the local and wider area. As part of the masterplanning and planning application process, visual representations of any proposed tall building will be undertaken to aid an assessment of the impact on its surrounding context. This will follow the EH/ CABI joint guidance.

The impact of any regeneration scheme in local and mid distance views identified by both boroughs in their emerging policy guidance will be assessed in developing the masterplan and working up a scheme proposal. This will include, if relevant, views from the river and the impacts on specific landmark features.

(h) provide for or enhance a mix of uses

The indicative Land Use Budget proposes a range of uses which will enhance those on the site at present to help create a vibrant mixed use new community.

(i) meet the requirements of the London View Management Framework

The Earls Court Regeneration Area does not fall within the protected viewing corridors. Tall buildings on the site could nonetheless be visible on the skyline and potentially appear to the side of the viewing corridors and in the background of other designated views in the LVMF. The potential visibility of buildings sited within the Regeneration Area, and their potential contribution to the attractiveness of the local townscape and skyline would be tested.

- 5.4 Development proposals coming forward in the Regeneration Area will do so as part of a masterplan and in accordance with design principles established through supplementary policy guidance and other development control considerations.

6.0 Townscape Strategy

- 6.1 A significant amount of residential and commercial development is appropriate across the Earls Court Regeneration Area given its size and accessibility. There is the opportunity to transform the Regeneration Area into a sustainable urban quarter of up to 1,640,000 sq m of development, comprising mostly residential (up to 900,000 sq m) and office accommodation (up to 550,000 sq m), with supporting retail (up to 55,000 sq m), hotel (up to 65,000 sq m), culture, destination and leisure (up to 50,000 sq m), and educational and other social and community facilities (up to 20,000 sq m). This is an indicative Land Use Budget as the potential of the Regeneration Area will evolve further as a masterplan is progressed, including extensive consultation. Developing the tall building strategy as part of this process will help to refine the quantum and mix of potential uses on the site.

Residential Development

- 6.2 The strong character of the crescents to the east suggests the potential for a connected street-related pattern within the Regeneration Area. The mansion blocks to the north-west of the area also present an attractive scale and form for the western edge. The need for larger, more family-oriented units would respond to this overall pattern of scale and form. The centre of the Regeneration Area, given its high accessibility and distance from adjacent neighbourhoods, is suitable for higher density and taller housing forms.

Office Development

- 6.3 Two general areas would appear most appropriate for office development. The visibility of the A4 / West Cromwell Road frontage provides good access and road connectivity. The centre of the Regeneration Area is placed conveniently between the LU Underground and NR overground stations, and a connecting spine of office locations could be arrayed along a north-south axis. This location is ideal for the variety of uses complementary to a business quarter, such as hotels and the range of small businesses and services that will support such activities.

Retail Development

- 6.4 To be sustainable, there should be sufficient retail activity to make the development an interesting and attractive new urban district able to service the population that would live and work there, while ensuring that such provision is complementary to and not competitive with, the existing retail centres and streets in the wider area. Private and public elements of the development would be further defined by shop frontages, and routes through the site and connections with the surrounding area strengthened.
- 6.5 The potentially higher intensity and strengthened accessibility of the centre of the Regeneration Area suggests a need to focus retail, restaurant and cultural activity with

sufficient critical mass to animate a central place (or places). Additionally, as the Regeneration Area is large and will be accommodating a substantial living and working population, and some areas particularly to the north and east will have no ready convenience shopping, some local retail clusters at appropriate places would also be desirable.

Cultural, Destination Leisure Uses

- 6.6 A comprehensive regeneration scheme to be promoted will include these facilities on parts of the Regeneration Area site in good proximity to Underground stations, where suitable accommodation can be provided and potential synergy created with other uses on the site. These facilities are likely to be related to the public realm strategy and opportunities for a range of character spaces appropriate to the scale and mix of surrounding uses.

Community Clusters

- 6.7 A development of this scale will bring a significant number of new residents to the area, creating the need for a range of new community facilities, which may include schools, doctors' surgeries, crèches and other services. The Regeneration Area could provide a cluster of service activity, open space and any required community facilities to create a sense of local identity, particularly in areas at some distance from local streets. The needs and locations for new community infrastructure will be determined at the masterplan and subsequent stages.

Open Spaces and Public Realm

- 6.8 The location and pattern of open spaces will be determined through a masterplan for the Regeneration Area to establish a hierarchy of open spaces comprising different types of open space that will benefit from the overall quality of the new district and its surroundings, while also responding to adjacent land uses and activities.
- 6.9 Open spaces will be established with good accessibility to Earls Court and West Brompton stations and the potential for a green link to West Brompton Cemetery would reinforce connection to what is already a cherished community asset, and which may in future become a more active open space under borough plans to add the cemetery to its collection of recreation spaces.

Possible Spatial Concepts for the Regeneration Area

- 6.10 Several potential spatial concepts for the Regeneration Area are being explored through the following broad options:
- (a) **The Grand Avenue:** an urban parkway would be extended north – south through the Regeneration Area, providing a strong structuring element and establishing a clear identity for the area.

(b) **The Organic Plan:** sinuous traffic routes would provide a more varied pattern of streets and blocks and would resolve many of the inherent spatial and formal complexities that exist adjacent to the area to create a seamless whole.

(c) **The Grid:** a regular grid of north-south and east-west streets would create an even distribution of districts, each potentially with their own identity, and a standardised block pattern.

(d) **The Crescents:** with this option the traditional crescent street pattern of West London would be extended west to provide a structure that generally reflects that of the wider area.

Conclusions

6.11 Spatial proposals will be assessed in relation to relevant design policy and guidance and the criteria set out in *By Design*, to realise urban design principles that would achieve a high standard of architectural quality.

7.0 Massing Strategy for Tall Buildings

- 7.1 The quantum of accommodation and potential spatial organisational options outlined in the previous section will result in a range of three-dimensional height envelopes for the Regeneration Area, which will be tested as a masterplan is evolved.
- 7.2 The Earls Court Regeneration Area is large enough, and its centre at a sufficient distance from adjacent neighbourhoods, to be an appropriate location for taller buildings. Locating tall buildings in the area would maximise the opportunity presented by its size, strategic location, high level of connectivity, and proposed quantum of development programme being proposed. Tall buildings that are thoughtfully sited and designed can create a sense of place that is interesting and varied. They would also be key to the development of a unique and identifiable image for the proposed urban quarter which would be achieved through quality design and character of world class standards.
- 7.3 A major development must however be planned with a high degree of sensitivity in the deployment of taller buildings if views of the area are not to be intrusive and the skyline of the development is to be an attractive addition to the profile of London. The area is relatively unaffected by protected views defined by the LVMF and the previous RPG3, and views and vistas from the locally sensitive locations. Potential impacts on local and district views from conservation areas, such as that from Brompton Cemetery, would be taken into account when fixing the scale, massing and location of tall buildings within the Regeneration Area. They would also be considered when forming detailed designs, so as to ensure that the architectural character of the development responds to the character of its locality.
- 7.4 Clustering of taller buildings into attractive composed groupings is consistent with current planning directions and provides an alternative to isolated, more intrusive, high buildings on individual smaller sites scattered through the boroughs. The LP supports 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 (Policy 4B.8). Tall buildings within the Regeneration Area would provide a sense of place and give the area its own sense of identity, and make the most of its role as a transport node for both boroughs.
- 7.5 The general pattern of heights in and around the Regeneration Area at present is of low to medium scale, with some significant exceptions. The existing Earls Court building complex is of very substantial bulk and reaches up to an effective 18 storeys and is highly visible from the surrounding area. The Empress State Building is 31 storeys and the TfL building to the north is 9 storeys. Isolated higher buildings are found along Lillie Road and Cromwell Road.
- 7.6 This height context and the proper respect for views of any regeneration scheme from the surrounding neighbourhoods and wider city suggest locating taller buildings along a 'ridge' of

height running north – south through the centre of the Regeneration Area. From this central ridge, development would scale down to make compatible transitions in scale to the surrounding areas, which are predominantly low-medium rise residential to the east and west with larger scale office and commercial buildings on the main roads to the north and south of the Regeneration Area. While attention to these local relationships is important, attention must also be paid to the collective composition of individual taller buildings, to its urban profile, when seen from a distance – something that should be deliberately sculpted to achieve an appropriate feature in the evolving landscape of London. Such clusters would be preferable to scattered towers.

- 7.7 In accordance with national and regional policy and guidance, design proposals for tall buildings should be judged in the round and on their specific merits: policy supports the notion that tall buildings may have an acceptable impact on even sensitive views if they are well designed. Indeed, in some instances tall buildings have been found to enhance sensitive views.
- 7.8 A detailed views assessment would be undertaken as part of this process to establish the potential visibility of development of varying heights in different locations on the site and the sensitivity of the viewpoint in townscape terms. The exercise would consider potential impacts in long, middle and local distance views including those designated in policy and from other locations agreed with the boroughs. The analysis would be based on survey material using the verified views methodology. It would be undertaken in consultation with RBKC, LBHF and other relevant stakeholders.

8.0 Conclusions

- 8.1 A masterplan would set the framework so that the architectural and urban design character – the townscape – of any proposals for the Earls Court Regeneration Area would achieve a high standard of architectural quality that meets the objective criteria for good urban design set out in *By Design*, which is endorsed by PPS1.
- 8.2 A significant amount of residential and commercial development is appropriate across the Earls Court Regeneration Area given its size and accessibility. To be sustainable, there should be sufficient retail activity to make the development an interesting and attractive new urban district able to service the population that would live and work there.
- 8.3 By responding to and connecting directly with the existing configuration of streets and building heights around the perimeter of the Regeneration Area a considerable diversity of built form is feasible and appropriate. The location and pattern of open spaces determined through a masterplan will establish a hierarchy of different types of open space that will benefit from the overall quality of the new district and its surroundings, while also responding to adjacent land uses and activities.
- 8.4 According to the existing strategic planning policy framework, the Earls Court Regeneration Area is an appropriate location in principle for tall buildings. The site has also been identified by both boroughs in draft Core Strategy documents as an appropriate location for tall buildings. The masterplan for the Regeneration Area could site tall buildings in appropriate locations within the Regeneration Area so as to enhance the local and wider townscape, in accordance with policy criteria.
- 8.5 In accordance with national and regional policy and guidance, design proposals for tall buildings should be judged in the round and on their specific merits: policy supports the notion that tall buildings may have an acceptable impact on even sensitive views if they are well designed. Indeed, in some instances tall buildings have been held to enhance sensitive views.
- 8.6 Where visible, individual well designed tall buildings could be designed to respond positively to the setting of existing buildings in these views, presenting high quality landmarks in relation to Earls Court and West Brompton LU stations. A cluster of tall buildings at this western gateway to London would have the potential to create a strong identity for this part of west London.
- 8.7 Tall buildings within the central zone of the Earls Court Regeneration Area that step down in height around the perimeter towards the lower heights of more traditional building forms locally, embracing new areas of public realm, would have the potential to create a major focus for a significant new urban quarter and sustainable community.