

London Borough of Hammersmith and Fulham  
Draft Local Plan

**Background paper: Tall Buildings  
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# TALL BUILDINGS

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## **1. Introduction**

1.1 In recent years there has been an increase in the number of applications to construct tall buildings, both in London and other cities. High rise has once again become popular, and tall buildings have powerful supporters, including many distinguished architects and developers. However, there are as many critics as supporters who fear we could repeat the mistakes of the 1960's. Much of the criticism is aimed at poor design, and poorly located tall buildings that have a significantly detrimental impact on the environment.

1.2 In June 2007, June 2009 and September 2010 we published background papers on tall buildings to support our proposed policy approach. This paper updates the council's position.

1.3 It sets out the London Borough of Hammersmith and Fulham's approach to the development of tall buildings in the borough and in particular identifying those broad areas where tall buildings may be appropriate within the existing townscape setting.

## **2. Definition**

2.1 Tall buildings have been defined as buildings which are significantly taller than the generally prevailing height of buildings in the surrounding area. Local context is important in this analysis. In large areas of the borough, where there is an unbroken pattern of residential streets lined with two-storey housing, a building of a relatively modest height would appear tall in this context.

## **3. The Townscape Context for Tall Buildings in Hammersmith & Fulham**

3.1 Historically within the borough, the taller buildings were primarily churches, or imposing civic and public buildings such as the town hall and schools. In many cases, these buildings still rise above the surrounding development and still have a presence in the local townscape. For example, in areas that have experienced little change over many years London Board Schools, such as Brackenbury Primary school, remain the dominant buildings in many local townscapes. In other areas that have experienced considerable change, the historic tall buildings can retain a presence and provide a focus for the surrounding development. St Pauls Church in Hammersmith Town Centre fulfils such a townscape role despite its taller commercial neighbours and the proximity of the elevated section of the A40.

3.2 Churches and schools and some town centre commercial development dominated the boroughs skyline until the 1960s when a much taller building typology, the tower, became popular.

3.3 Hammersmith and Fulham has tall buildings spread across its area, many of which were constructed either as part of comprehensive renewal of residential areas, or as part of the office development boom such as that in 1970s and 1980s which tended to concentrate the new high commercial buildings in the town centre locations where they could take advantage of good transport links and a more vibrant and supportive environment.

3.4 There are clusters or concentrations of non-residential tall buildings in the north of the borough at Hammersmith Hospital and around the BBC campus. Tall commercial buildings define Hammersmith town centre stretching along Hammersmith Road, and individual tall buildings, such as Charing Cross hospital and those in the Earls Court area, such as the Empress state building, feature strongly on the boroughs skyline. All of these buildings have an impact on wider views as well as a local impact.

In residential areas, towers appear as part of a wider redevelopment such as those at Edward Woods Estate and Clem Atlee estate. More recent residential developments such as Chelsea Harbour and Imperial Wharf have introduced groups of taller buildings. The borough also accommodates several individual towers, such as on the Townmead estate.

3.5 Some of the existing tall buildings in the borough are of greater architectural quality than others but all have an impact over wide areas of the borough. This is due primarily to the general scale of development across the borough which tends to be two to four storeys.

3.6 The borough is predominantly residential and is characterised by continuous street blocks and enclosed spaces. Building heights in each of the residential neighbourhoods are relatively consistent giving a sense of homogeneity and well-defined character. Most of these areas are much-valued and their contribution to the townscape of the borough has been recognised by designating them as conservation areas. Just over 50% of the borough is now within a designated conservation area. Conservation areas in the borough which are predominantly residential are considered to be inappropriate locations for tall buildings. New development in the boroughs conservation areas would be expected to respond to the existing townscape context which would include the height and scale of the surrounding buildings.

3.7 The boroughs townscape is fortunate to include many listed buildings. Their settings would be sensitive to the impact of tall buildings. It is difficult to define the setting of the listed buildings on plan, as a tall building some distance from a listed building could have a significant detrimental impact on its setting. Such

impacts could only be determined through photomontage and three-dimensional studies to ensure that the setting is not harmed.

3.8 The fine grain, generally tight-knit pattern of streets and topography of the area means that mid and long distance views across parts of the Borough are limited. The borough sits within the Thames valley and so is generally flat and does not provide for distant panoramas. However the land does rise toward the northern part of the Borough and from Wormwood Scrubs more distant views across the Borough towards central London area available. Such views are rare, but open aspects are afforded both along the riverside and from within areas of open space which provide some relief from the dense built environment. Particularly sensitive riverside views have been identified in Draft Local Plan Review [2014] – Policy DC 7. Views from the boroughs open spaces can also be sensitive especially where their character is one of tranquil seclusion and where views out are generally uncluttered by tall buildings appearing over perimeter tree screens.

3.9 The Council places a high value on the existing historic and residential environment. It also seeks to protect the distinctive character of its open spaces and riverside frontage. They provide the context for new development. Any aspiration to achieve higher densities through new development must be balanced by contextual issues if we are to avoid harming those characteristics that make an area special. An analysis of the scale and character of the Hammersmith and Fulhams townscape and open spaces suggests that tall buildings would be generally inappropriate across the Borough. However, it is recognised that outside of those areas which present significant constraints, there are limited areas where the existing physical character and townscape composition provides some opportunity to accommodate tall buildings. It is also recognised that in these areas they have the potential to make a positive contribution to the boroughs townscape as a distinctive high quality landmark or as part of a linked cluster forming part of a unique and identifiable skyline.

3.10 This analysis seeks to direct proposals for tall buildings to areas of the borough most capable of accommodating them.

#### **4. Policy Background**

##### London Plan [2011] and Further Alterations to the London Plan [2014] – Strategic area based approach

4.1 The London Plan Policy 7.7 – *Location and design of tall and large buildings* states that tall and large buildings should be part of a plan led approach to changing or developing an area, by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptable harmful impact on their surroundings. The Policy lists criteria

which tall buildings should meet and outlines impacts which should be avoided. It includes the following *spatial* criteria;

Tall and large buildings should...

- generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;
- individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;
- make a significant contribution to local regeneration.

4.2 Paragraph 7.27 explains that – The location of tall or large buildings, its alignment, spacing, height, bulk, massing and design quality should identify with and emphasise a point of civic or visual significance over the whole area from which it will be visible. Ideally, tall buildings should form a cohesive building group that enhances the skyline and improves the legibility of the area, ensuring tall and large buildings are attractive city elements and large buildings are attractive city elements that contribute positively to the image and built environment of London.

4.3 The plan goes on to address the issue of location and the policy states that

“Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks. These areas should be consistent with the criteria above and the place shaping and heritage policies of this Plan.”

Paragraph 7.28 goes on to explain that, “Opportunity area planning frameworks can provide a useful opportunity for carrying out such joint work.”

4.4 The London View Management Framework (March 2012) identifies important strategic views of Londons heritage which should be protected and managed. One of these views, namely the linear view from King Henrys Mound in Richmond Park towards St Pauls Cathedral, crosses the Borough. The vista is primarily protected to ensure that development in the background of the view of the Cathedral is subordinate to it, and that the clear sky background profile of the upper part of the dome remains.

#### CABE/English Heritage – area based approach

4.5 CABE and English Heritage note in para. 2.3 of their Joint Guidance on Tall Buildings July 2007 that local authorities “identify geographical areas where tall buildings will or will not be appropriate based on urban design analysis.”

4.6 The guidance goes on in para. 2.5 to state that “Both CABE and English Heritage strongly endorse this approach, and recommend that local planning authorities should now identify appropriate locations for tall buildings in their development plan documents. These should be drawn up through effective engagement with local communities and with proper regard for national and regional planning policies and matters such as local environment” ensuring “that tall buildings are properly planned as part of an exercise in place-making informed by clear long-term vision.”

4.7 The guidance goes on in para. 2.7 to state that “In addition to considering the wider objectives of sustainable urban design that apply to all new development... they should: take into account the historic context of the wider area through the use of historic characterisation methods... carry out a character appraisal of the immediate context, identifying those elements that create local character and other important features and constraints, including: natural topography, urban grain, significant views of skylines, scale and height, streetscape, landmark buildings and areas and their settings, including backdrops, and important local views, prospects and panoramas; identifying opportunities where tall buildings might enhance the overall townscape, identifying sites where the removal of past mistakes might achieve a similar outcome.”

4.8 In October 2014, English Heritage and the Design Council published a revised paper on Tall Buildings for consultation. The consultation period ended on the 30 November 2014.

4.9 The updated guidance paper was prompted by the new context provided by guidance issued by Central Government in 2012 in the National Planning Policy Framework, and experience gained in assessing schemes for tall buildings over the last seven years.

4.11 The National Planning Policy Framework promotes the pursuit of sustainable development which has implications for the location of tall buildings as well as a requirement to improve the quality of the built environment and the historic environment.

4.12 The main principles established in the earlier document remain the same. It strengthens the requirement for a plan-led approach. Importantly, it states that tall buildings should strive to achieve exemplary standards in sustainable design and that they should aim to exceed levels set.

The document also accepts that in exceptional circumstances for example where the tall building is part of a credible long term master plan, they can be submitted for outline consent.

Reviewing the Development Management Local Plan policy

4.13 The preparation of the Development Management Local Plan has provided the opportunity to review the Council's policy on tall buildings and sought opinions on the options available. The issue was first presented for public consultation at the end of 2005. Although there were a variety of views about the location of tall buildings in the borough, there was some agreement that the White City Opportunity Area might be suitable for tall buildings and possibly parts of Hammersmith town centre.

4.14 In June 2007 the council published Core Strategy preferred options and stated that the preferred option was to identify "specific areas of the borough suitable for tall buildings, namely parts of the White City Opportunity Area and the central part of Hammersmith town centre, and to identify areas of special character in the borough that would be sensitive to tall building".

4.15 In June 2009 the council published Core Strategy Options and identified areas "where tall buildings maybe appropriate" but added that "detailed justification will be required in all cases". These areas were: in parts of White City Opportunity Area, in central parts of Hammersmith town centre, in parts of Earls Court/North End regeneration area and in limited part of South Fulham riverside regeneration area. There was a mix of views, ranging from support from developers and concern from local societies. A number of representations sought the identification of additional areas.

4.16 In June 2011 the council published Core Strategy and identified tall buildings being those "which are significantly higher than the generally prevailing height of buildings in the surrounding area." It outlined areas where "tall buildings may be appropriate... in parts of the White City Opportunity Area... Earls Court and West Kensington Opportunity Area... limited parts of South Fulham Riverside and in parts of Hammersmith Town Centre." However, in these areas "tall buildings will need to respect the existing townscape and historic context and make a positive contribution to the skyline emphasising a point of civic or visual significance." They will also need to "demonstrate tangible urban design benefits, and be consistent with the council's wider regeneration objectives."

4.17 In July 2013 the council published the Development Management Local Plan. In Policy DM G2 it notes that "apart from those areas identified in the Core Strategy, tall buildings which are significantly higher than the general prevailing height of the surrounding townscape and which have a disruptive and harmful impact on the skyline will be generally resisted by the council." This policy goes on to list the criteria which every proposal for a tall building should make.

4.18 The Development Management Local Plan July 2013 also identified in Policy DM G6 key local views which would be sensitive to tall buildings. The policy states –



1. Development within the Thames Policy Area will not be permitted if it would cause demonstrable harm to the view from the following points:
  - a. From Hammersmith Bridge, the view along the river, foreshore, and riverside development and landscape between Hammersmith Terrace to the west and Fulham Football Ground to the south.
  - b. From Putney Bridges, the views along the river, foreshore and riverside, extending upstream from All Saints Church and its environs, along Bishops Park as far as Fulham Football Ground and from Putney Railway Bridge the view downstream to the grounds of the Hurlingham Club
  - c. From Wandsworth Bridge, the view up and downstream of the river, its foreshore and banks, and of commercial wharves and riverside buildings
2. Development will also not be permitted if it would cause demonstrable harm to the view within the Thames Policy Area of any of the following important local landmarks identified on the Proposals Map, or their settings:
  - a. Upper and Lower Mall. The richness, diversity and beauty of the historical waterfront which includes Hammersmith Terrace, Kelmscott House and neighbouring group of listed buildings, and the open space of Furnivall Gardens allowing views of the skyline of Hammersmith and the spire of St Pauls Church.
  - b. Bishops Park. The parallel avenues of mature London Plane trees and dense shrubbery which define the character of this important open space and the riverfront
  - c. Grounds of the Hurlingham Club. The landscaped edge of the grounds providing glimpsed views to the listed Hurlingham House
  - d. Hammersmith Bridge. The fine example of a suspension bridge is particularly dominant, and is an important landmark along this stretch of the river
  - e. Putney Bridge and the adjacent All Saints Church

4.19 These policies have been consolidated in the Draft Local Plan Review [2014]. Borough-wide Policy DC1 encourages development to create a high quality urban environment that respects and enhances its townscape context and heritage assets. The policy goes on to identify five areas in the Borough where, as a result of the new analysis, tall buildings may be appropriate ;

- *In parts of White City Regeneration Area.*
- *In parts of the Earls Court & West Kensington Opportunity.*
- *In limited parts of South Fulham Riverside Regeneration Area (see also policy in River Thames and Canal section).*
- *In parts of Hammersmith Town Centre. Not all parts of the town centre will be suitable and any proposals for tall buildings will need to respect the existing townscape and historic context and make a positive contribution to the skyline emphasising a point of civic or visual significance.*
- *In parts of the Old Oak Regeneration Area, tall buildings of exceptionally*

*good design may be appropriate as part of the plan for regeneration, taking advantage of the high public transport accessibility that the HS2 proposals would afford the area.*

4.20 Other existing policies relating to tall buildings are transferred in to the new Draft document. Existing Policy DM G2 which highlights those aspects which should be addressed by any proposal for a tall building, are now included in Policy DC 3, and Policy DM G6 is now found in Policy DC 7.

## **5. Review of the Analysis**

5.1 The tall buildings study was originally undertaken in 2007 to review the current policy in the light of the London Plan and other guidance. The study developed a spatial analysis which would broadly determine where tall buildings would, and would not be acceptable.

5.2 The preferred approach for a new policy on tall buildings was drafted on the basis of the outcome of the study.

5.3 In 2010 the council reviewed its spatial vision for the borough and identified a number of regeneration areas and development opportunities where it wants to encourage investment in a sustainable and coordinated way. It was considered that tall buildings could be an appropriate building form to support these aims.

5.4 Since 2010, the Government announced proposals for a High Speed 2 station at Old Oak Common that would connect to Crossrail and the Great Western Main Line. This would dramatically increase transport access in the area and open up opportunities for regeneration and development. The current Core Strategy policy for the Park Royal/Old Oak area does not set out a framework that would facilitate this regeneration and development potential. The council therefore considers it is appropriate to commence a review of this policy.

## **6. Methodology**

6.1 The aim is for any new tall building to form an integral part of a coherent composition of tall buildings and to avoid the uncoordinated random placing of towers across the Borough. This will allow for the provision of high quality tall buildings in the right location, where they may act as a landmark, and where the infrastructure is capable of accommodating the intensity of use.

6.2 In reviewing the policy towards tall buildings, a spatial analysis has been developed by the council which is informed by the London Plan, the CABE / English Heritage Guidance on Tall Buildings and other guidance. The analysis of

the guidance provided clear indications of the issues/factors to be taken into account when assessing suitability of areas to accommodate tall buildings.

Areas where tall buildings might enhance the townscape and where existing conditions are likely to increase the acceptability of any proposal were plotted.

1. Tall buildings can reinforce the role of **town centres**. In these locations, tall buildings can help to concentrate the quantum of business activity in a relatively confined area that is a key gateway or civic location - one of high public transport activity and that has a network of established supporting businesses. The three town centres in Hammersmith and Fulham display different characteristics. The form of development varies. It may be the case that only Hammersmith and possibly parts of Shepherds Bush could accommodate a tall building without detriment to the character of the town centre.
2. It is widely accepted that tall buildings can **help regenerate an area** by attracting investment. High buildings can give an area focus and identity. It might therefore be appropriate to locate a tall building within the White City Opportunity Area provided it had positive social, economic, environmental and functional connections to the surrounding context.

Since June 2007 the council's regeneration objectives have become clearer. In addition to the White City, other regeneration opportunities have been identified at Earls Court and West Kensington, the South Fulham riverside and Old Oak. Tall buildings may also be appropriate in these areas.

3. **Transport capacity** is a major consideration in deciding whether a proposal for a tall building [or any high density development] is given planning permission. The intensity of use associated with tall buildings will only be appropriate if it is supported by an appropriate level of transport capacity to ensure good pedestrian and public transport access. The areas of existing high public transport accessibility – PTAL 5 and 6, which could support the location of a tall building, are in town centres...
4. **Existing tall buildings** within the Borough were identified to examine whether a pattern of **clusters of tall buildings** is evident. There is a good deal of debate on whether tall buildings should be clustered or seen as individual buildings on the skyline. It is generally considered that tall buildings should be clustered to maximise their economic and sustainable advantages and centred on nodes of public transport. The random pattern of pepper-potting tall buildings across the Borough would therefore be inappropriate.

5. One of the major criticisms of the earlier generation of tall buildings was the harsh environment they created around their base and the immediate surroundings. Both the London Plan and the CABA / English Heritage guidance require tall buildings to **include adequate space around the building**, both for its setting, and to achieve public realm improvements. This is difficult to map and needs to be part of the criteria based part of a tall buildings policy.

Areas where tall buildings are unlikely to be acceptable were plotted.

1. As part of the London Plan, the Mayor has produced a London View Management Framework Supplementary Planning Guidance. **The view from King Henry's Mound in Richmond Park to St. Pauls Cathedral** is a protected view. This view corridor crosses the Borough as a relatively narrow cone.
2. Local planning authorities have been invited to designate any **significant local views** worthy of protection in their development plans. LBHF's Local Plan Policy identifies significant views from the bridges and significant views of landmarks along the riverside (Policy DC 7). Other more local views worthy of protection and management have been identified in character profiles for each other the Borough's conservation areas. These views are sensitive to tall buildings.
3. English Heritage has emphasised that tall buildings are not appropriate in historic settings such as **conservation areas**, and that no tall building however good the design would be acceptable in these historic contexts. NPPF aims to protect the setting of conservation areas from inappropriate development on sites outside of the conservation area that would have an impact upon it. The Borough's conservation areas have been plotted. The setting of these areas would need to be addressed especially along a key axis leading into the area.
4. The **setting of a listed building** can be seriously harmed by the inappropriate location of a tall building.
5. CABA / English Heritage guidance identifies **open spaces and their settings** as being particularly sensitive to the location of tall buildings
6. Similarly, CABA and English Heritage identify **Historic Parks and their settings** as being particularly sensitive to tall buildings. The Historic Parks in the borough are St Peters Square, Fulham Palace Gardens, Bishops Park and Kensal Green Cemetery.
7. The CABA / English Heritage guidance also identifies waterways such as the **Riverside and Canalside** and their settings and views from them as

requiring special attention. The London Plan does not rule out tall buildings along the water edge, but says that they should “Relate positively to water spaces taking into account the particular needs and characteristics of such spaces”. The character and scale of most of Hammersmith and Fulham’s riverside and canalside is such that tall buildings will only be acceptable if part of a key design element in a masterplan for regeneration and if they would have a positive relationship to the riverside.

The Character Profiles of the conservation areas that border the Thames confirm the view that tall buildings would be generally inappropriate.

8. **Areas of consistent scale, height and grain** – some residential estates and neighbourhoods will also be sensitive to the intrusion of tall buildings.

## 7. Results of the Analysis

7.1 Spatially mapping this information allows a “picture” of the Borough to be created which shows;

1. those areas which are capable of accommodating tall buildings, and
2. those areas in which tall buildings are likely to be inappropriate.

7.2 From this analysis, there are five locations which appear to be capable and suitable of accommodating tall buildings, namely:

- White City
- Hammersmith Town Centre
- Earls Court and West Kensington
- South Fulham riverside
- Old Oak area

### WHITE CITY

7.3 White City is a large area of underused industrial land, where the potential for significant regeneration building upon the success of Westfield shopping centre and the improved transport links has been identified. The BBCs Media Village and Imperial Colleges new campus under construction north of the A40 both have an important presence in the area.

It is envisaged that the regeneration of White City would be for mixed use developments, and that tall buildings could be part of the urban design strategy making a positive contribution in key locations in the area.

7.4 The townscape visual assessment studies undertaken as part of the White City Opportunity Area Framework identified more specific areas which are likely

to be appropriate for taller buildings as part of the urban design masterplan. The framework encourages a plan where new development respects the scale of adjoining development along its edges, but with increased massing towards the centre of the site. The scale should be generally medium rise and aim to meet the regeneration new development respects the scale of adjoining development objectives of the area. A limited number of tall buildings of exceptionally good design may be acceptable especially in locations close to the A40 and A3220 where they are not considered to have a detrimental impact on the setting of listed buildings, the character and appearance of the Wood Lane conservation area, or the setting of other neighbouring conservation areas and the local area.

7.5 White City East is the most appropriate area within the WCRA for taller buildings. This is mainly due to the area east of Wood Lane being surrounded by larger pieces of infrastructure that separate the taller elements from lower rise housing in the surrounding area.

7.6 Along the A40 Westway, tall buildings near the Westway and northern section of West Cross Route will provide strong identity and landmark White City as the 'gateway' into central London. Taller buildings will provide a buffer to the flyover for development within the OA, and the scale would balance and respond to the existing height of the elevated road infrastructure. There is scope for up to two towers, one to the north and one to the south of the Westway. This will provide points of visual emphasis on the north-south roads through the site and will be landmarks in views northwards from White City Green and Westfield.

7.7 It was also considered that at White City Green, buildings of increased scale could highlight the area as a centre of activity. Tall buildings around the Green could provide recognisable and identifiable address for new commercial and residential developments, frame views to the BBC from the east, complement the delivery of White City Green and nearby community and leisure facilities; and capitalise on prime location fronting open space. When viewed from the Westway and long cityscape views, the buildings would read as part of the cluster of tall buildings to the east of West Cross Route.

7.8 Proposals for tall buildings within the WCRA should demonstrate that they do not have a negative impact on the character and setting of Listed Buildings, Conservation Areas and the local area in general. This will also be subject to consideration of other design and amenity policies as set out within the Borough-Wide policies within this Local Plan.

7.9 It was considered that the Listed BBC Television Centre would be enhanced by the demolition of the existing east tower and the building of a replacement tall building of much higher quality with a better relationship with Wood Lane. With the Westfield development at the West Cross Route there would be an east-west visual connection across the entire site.

7.10 The White City Opportunity Area Planning Framework assessed the impact of the potential location of tall buildings on views into and out of the OA. This included views to and from RBKC and local conservation areas. It was concluded that taller buildings in the locations identified could be satisfactorily accommodated. However, as proposals come forward, each would need to be accompanied by a full townscape visual assessment.

## HAMMERSMITH TOWN CENTRE

7.11 Development in Hammersmith town centre should seek to maintain the centre as a major town centre and key strategic office and retail location. The centre has major locational advantages. It is home of the local government service as well as Hammersmith Police and Fire stations. It also retains a strong presence of arts and entertainment facilities. The continued regeneration of the town centre has the potential to include tall buildings within the urban design framework.

7.12 Hammersmith Town Centre has a number of existing tall buildings, and further tall buildings of a similar height would therefore be appropriate, visually reinforcing the role of this major town centre by adding to the legibility of a linked cluster, and marking a sense of arrival at this major public transport interchange. Not all parts of the town centre will be suitable and any proposals will need to make a positive contribution to the skyline emphasising a point of townscape or visual significance and demonstrate tangible urban design benefits. In the wider regeneration area, for example, close to the riverside, tall buildings are likely to be unacceptable.

7.13 Any new buildings in this part of the town centre will need to respond to the current prevailing heights. A taller building has been approved at Sovereign Court for 17 storeys. Further proposals for tall buildings in the town centre will need to ensure that the building height will not adversely impact on nearby heritage assets, the townscape and views from the river, while still visually reinforcing the role of this major town centre by adding to the legibility of a linked cluster of buildings.

## EARLS COURT AND WEST KENSINGTON

7.14 Earls Court has been identified in the London Plan as an Opportunity Area which can deliver a significant number of new homes. The regeneration would be residential led but would provide the opportunity for a range of supporting uses.

7.15 In parts of the proposed Earls Court and West Kensington Opportunity Area there would be some scope for some tall buildings. The Earls Court Planning

Framework identifies that the area already accommodates three significant tall buildings within the OA; the 31 storey Empress State Building; Earl's Court 1 which is a maximum height of 63m AOD; and Earl's Court 2. Other buildings with significant height in the OA are dispersed more widely. Ashfield House to the north, and the four residential blocks on the west rise to between 9 and 11 storeys.

7.16 The area is tightly bound by a strong, well-established urban form. The height and massing of new buildings on the edges of the opportunity area is expected to respect the scale and massing of neighbouring buildings and provide a contextual response. The massing of the new development in the northern part of the area will be expected to create a 'Metropolitan Face' which responds to the strategic importance of the A4. The built form here should create a strong edge, which may benefit from some relatively tall elements, including potential 'gateway' landmark building(s) at the main entrance to the opportunity area.

7.17 The surrounding area is sensitive in heritage terms. The Earls Court Planning Framework seeks to preserve or enhance the character, appearance and setting of surrounding conservation areas and listed buildings. Development proposals, including those containing tall buildings, must respect the character and appearance of their surroundings.

7.18 The Townscape and Visual Analysis SPD Supporting Evidence Document accompanying the Planning Framework for the area sets out a limited number of exceptional views within the OA's surroundings from which it will not be appropriate for any new building to be visible on the skyline. However, for the majority of the views, the authorities accept that some new buildings would inevitably be visible and would be acceptable if sound urban design justification is provided. This justification should address how the alignment, spacing, height, bulk, silhouette, massing and design quality of proposals will be combined to enhance the skyline.

7.19 Where tall buildings are visible on the skyline they should enhance legibility. This is the case of the Empress State Building. It would work as a successful landmark, signifying the location of the redevelopment within the opportunity area. The vicinity of the Empress State Buildings was identified in three dimensional analysis undertaken as part of the Development Capacity testing exercise as the "most appropriate location for additional tall buildings in the OA". Any proposal to retain the Empress State Building should integrate it into an attractive composition of new tall buildings that form a coherent group around it.

7.20 The Planning Framework identifies the key considerations for the success of the grouping. It comments that it is the grouping of the buildings and the way in which they read together, that will be the primary source of local distinctiveness. Therefore, for a cluster of tall buildings, attention should be paid to the profile of the top of each building within the context of the whole cluster. A cluster can be



attractive and is preferable to an approach that sees them scattered across the OA with no relation to one another. Whilst the lower levels of the individual taller buildings that form a cluster may be largely solid, it is important that their upper levels are variable, with plenty of sky visible between them. This will avoid a visual merging of the cluster into a 'solid wall' of several buildings each of similar form and height.

7.21 Any proposals for tall buildings will need to be put in context as part of full urban design analysis that considers, in particular, local and longer distance views (e.g. from the riverside), as well as examining the impact on the rest of the Opportunity Area and conservation areas in the surrounding area in both boroughs. Care needs to be taken to protect and enhance the character and appearance of Brompton Cemetery in the Royal Borough of Kensington and Chelsea which is a Grade I Registered Historic Park and Garden of Historic Interest.

## SOUTH FULHAM RIVERSIDE

7.22 The river frontage in this area is some 1700m long. Much of the area consists of underutilised and vacant riverfront land. Access to the riverside, and the amenity it provides, is limited. The riverside is of strategic importance to London. New development should enhance the river frontage and respect the riverside setting. Tall buildings could be used in the Urban Design Strategy to mark key locations in the masterplan

7.23 The Council are committed to ensure that South Fulham Riverside should be designed to create a coherent and integrated place and thereby contribute to the development of a sense of place for the whole of South Fulham Riverside. The regeneration area should develop as a place with its own character that is linked to the surrounding townscape context.

7.24 In order to achieve the linkage, it is important that the massing, form and design of the new development should respect the scale of the existing townscape especially the residential scale of the buildings to the north of the regeneration area. The built form along both Carnwath and Townmead roads would need to be mindful of the existing residential development along these routes and respect their more domestic scale.

7.25 Building height can be stepped up towards the riverfront. Here, the built form would need to provide a clear edge to the riverside walk and associated public realm, and address the river. These buildings would need to be of a height and scale for the riverside to give an appropriate definition and presence to enclose the space.

7.26 Within the key massing principles for the wider area, there would be limited scope for tall buildings. The River Thames forms a key part of the character of South Fulham Riverside with important views from Wandsworth Bridge both up, and downstream to be protected and managed [Draft Local Plan Review [2014] Policy DC 7]. There would however be scope for taller buildings at key nodes in the area in order to achieve both variation in height and to mark the key places.

7.27 The townscape analysis of the framework area suggests that South Fulham Riverside has two key focal points – one at Fulham Wharf, where the supermarket provides a draw and focus of activity, and the other in the Imperial Wharf area based around the existing larger scale development and new station and park.

7.28 The Imperial Wharf station location already supports development of an increased massing and height and this could be consolidated to achieve a coherent grouping.

## OLD OAK

7.29 The Old Oak regeneration area is a large area of underutilised land in the northern part of the borough. A new station connecting HS2, Crossrail and the Great Western Main Line is proposed to be developed, making it one of the best connected stations in the UK. The area comprises 105 hectares and offers significant potential for comprehensive mixed use renewal optimising the amount of new homes and new jobs

7.30 In parts of Old Oak regeneration area there maybe scope for tall buildings which is set out in the Old Oak Vision document. The document's urban design vision identifies Old Oak as a new metropolitan destination which may include some tall buildings of exceptionally good design, around the transport hubs. Where appropriate, views could be terminated either by existing or new local landmarks which could include tall buildings.

7.31 At the Old Oak Common High Speed 2 station, there may be opportunities for tall buildings, recognising the improved transport accessibility that the station would provide as well as the ways in which tall buildings can act as landmarks and help to mark the location of Old Oak Common International station. The Park Royal Opportunity Area Planning Framework identifies North Acton as a location suitable for tall buildings with development taking place and planning permission granted for further buildings. The scale of the cluster of tall buildings at North Acton is likely to be secondary to that at Old Oak Common, given the latter's higher accessibility, but the principles of development in terms of their impact on the London skyline would be the same. Initial townscape analysis suggests that Old Oak would be appropriate for tall buildings. However, as any proposal comes forward it would need to be accompanied by a full townscape and visual analysis,

to ensure that they do not detrimentally impact on residential amenity and nearby open spaces and heritage assets such as Wormwood Scrubs, the Grand Union Canal, St. Mary's Cemetery and Kensal Cemetery.

7.32 Any tall buildings would need to be located sensitively and be exceptionally well designed in order to ensure that they make a positive contribution to the skyline. Tall buildings would need to be perceived as separate elements within a coherent group rather than combine to form a single mass, particularly when viewed from the Grand Union Canal to the north and Wormwood Scrubs to the south.

## **8. Conclusion**

8.1 Hammersmith and Fulham's approach has been to use current policy and guidance to identify broad areas which could accommodate tall buildings. The precise boundaries cannot be identified using a two-dimensional mapping methodology; neither can height controls be stipulated. It is also clear that there may be specific sites within the areas identified where tall buildings may prove to be unacceptable. Detailed townscape view assessments have been undertaken as part of the planning framework process for some of the Boroughs regeneration areas. This work has informed the document. However, a more refined assessment would need to be made of individual proposals which would include, amongst others, issues of analysis of impact on skyline from various viewpoints, quality of architecture and materials, ground floor activity and relationship to surrounding streets, overshadowing and micro-climate, the provision of a mix of uses, sustainable design, and an assessment of the impact of the proposal on the transport infrastructure. Further detail on these matters is included in the Draft Local Plan Review, in particular Policy DC 3.