

London Borough of Hammersmith and Fulham  
Local Development framework

**Background paper: Tall Buildings**

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# TALL BUILDINGS

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## **1. Introduction**

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 is once again becoming 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.

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

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

## **2. Definition**

Tall buildings have been defined as buildings that are significantly taller than their surroundings. 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 20m in height would be considered to be a tall building. The Council have used this benchmark height as the definition of a tall building in earlier policy statements relating to tall buildings included in the UDP.

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

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 fulfills such a townscape role despite its taller commercial neighbours and the proximity of the elevated section of the A40.

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.

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.

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.

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.

The borough is predominantly residential and is characterised by a street block of continuous 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 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 of the surrounding buildings.

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.

The fine grain, generally tight-knit pattern of streets and topography of the Borough means that mid and long distance views 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 UDP policy. 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.

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.

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

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

##### London Plan – Strategic area based approach

The London Plan designates important strategic views of Londons heritage which should be protected. One of these views, namely the linear view from King Henrys Mound in Richmond Park towards St Pauls Cathedral, crosses the Borough.

Policy 4B.9 of the London Plan February 2008 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 their design and impact on their surroundings". The plan goes on to address the issue of location and the policy states that "the Mayor will work with boroughs ....to help identify suitable locations for tall buildings that should be included in DPDs ...these may include some Opportunity Areas". The policy adds that "Boroughs may wish to identify defined areas of special character that could be sensitive to tall buildings within their DPD. In doing so, they should clearly explain what aspects of local character could be affected and why. They should not impose unsubstantiated borough-wide height restrictions."

More recently in "A new plan for London" April 2009, which sets out the Mayor's initial proposals for the review of the London Plan, the Mayor states that "tall buildings will continue to have a place in London, but they will be sited where the existing context, and boroughs, can support them".

The consultation document on the replacement London Plan includes Policy 7.7 – Location and design of tall and large buildings. It states that tall and large buildings should be part of a strategic approach to changing or developing an area, and should not have an unacceptably harmful impact on their surroundings. The Policy lists criteria which tall buildings should meet and outlines impacts which should be avoided.

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

CABE and English Heritage note in para. 2.3 of their joint guidance on tall buildings that "The government has encouraged local planning authorities to identify suitable locations where tall buildings are, and are not, appropriate, and areas where such developments are a possibility."

The guidance goes on in para. 2.4 to state that "Both CABE and English Heritage strongly endorse this approach, and recommend that local planning authorities should carry this out as part of their plan-making functions. Where there is a possibility of such proposals, the locations where tall buildings are, or are not, appropriate should be identified in local authority development plans, or in future when preparing development plan documents."

#### Current UDP policy context

LBHF's former policy on tall buildings, policy EN9 of the UDP, was directed by the Secretary of State to expire in September 2007. The policy identified tall buildings as being in excess of 20m. The UDP policy was considered by the GLA to be overly restrictive and not in conformity with the London Plan.

However, the UDP identified in Policy EN31 key local views which would be sensitive to tall buildings. These views remain sensitive... 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

### Reviewing the UDP policy

The preparation of the Local Development Framework 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.

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".

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.

In November 2009 the council published Generic Development Management Options which included the proposed criteria that the council will use to assess tall buildings.

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

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 had as its purpose, developing a spatial analysis which would determine where tall buildings would, and would not be acceptable.

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

Since 2007 the council has reviewed its spatial vision for the borough and has, in particular identified a number of regeneration areas and development opportunities where it wants to encourage investment in a sustainable and coordinated way.

## **6. Methodology**

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.

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 Opportunity Area, other regeneration opportunities have been identified at Earls Court and West Kensington Opportunity Area, and the South Fulham riverside area. 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 CABE / 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 guidance replaces the existing guidance in RPG3. **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 UDP identifies significant views from the bridges and significant views of landmarks along the riverside. 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. PPS 5 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. CABE / English Heritage guidance identifies **open spaces and their settings** as being particularly sensitive to the location of tall buildings
6. Similarly, CABE 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 CABE / 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 Thames Strategy Kew to Chelsea and 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** – residential estates and neighbourhoods will also be sensitive to the intrusion of tall buildings.

## 7. Results of the Analysis

Plotting of the above information allows a “picture” of the Borough to be created which shows;

1. those areas which are capable of accommodating tall buildings,
2. those areas in which tall buildings would be inappropriate, and
3. the intermediate areas - those areas in which tall buildings would not be ruled out on townscape or environmental grounds, but areas which either do not have the supporting infrastructure or where tall buildings would not have a positive enhancement effect on the surrounding townscape.

There are four locations which appear to be capable and suitable of accommodating tall buildings, namely;

- In parts of White City Opportunity Area to be identified in the White City Opportunity Area Planning Framework. The Opportunity Area could accommodate a significant new urban quarter consisting of a range of uses which would enhance connectivity with surrounding development and complement the newly completed Westfield development offering strategic retail provision. The Opportunity Area includes some parts which are fragmented and less constrained in terms of local townscape context than other parts of the Borough. Tall buildings may be appropriate here as part of a high quality sustainable development providing a distinctive recognisable landmark. The White City Opportunity Area Framework will set out guidance on this matter..
- In Hammersmith Town Centre. 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 civic or visual significance, demonstrate tangible urban design benefits, and be consistent with the Council’s wider regeneration objectives. The success of the town centre is due to the range of uses and facilities located there. The central area contains the library and theatre. King Street is the main retail axis with major commercial buildings found at the eastern end. The western end of the area contains the town hall and is an area of civic significance. The town centre has undergone major transformation over the past thirty years with the Broadway Island site, the Ark and the Magistrates being notable additions. The 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. In the wider regeneration area, scope for tall buildings would be limited.

- In parts of the proposed Earls Court and West Kensington Opportunity Area. There is significant opportunity for the regeneration of this area bringing together various sites. The area already benefits from a strong identity and a distinctive townscape which could be enhanced through regeneration and an intensification of use. The regeneration could provide a mix of uses including residential, offices, leisure and cultural, as well as securing comprehensive streetscape improvements. As part of the regeneration of this area, there would be some scope for tall buildings. The Earls Court Planning Framework will set out further guidance..
- In limited parts of South Fulham riverside regeneration area. Whilst the riverside would generally be inappropriate for tall buildings, the South Fulham riverside area contains several vacant and underused sites. The regeneration of this area would enhance the riverside improving connectivity to the riverside and the public realm generally. There would be an opportunity to introduce taller buildings in limited areas. The areas with potential will be identified in the planning framework.

Designation of these areas would not rule out other locations for tall buildings in the borough, but proposals in these areas would need to be especially justified because they would not be preferred locations.

## **8. Conclusion**

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. 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 will be included in the Generic Development Management DPD.