

Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document

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# CONSULTATION RESPONSES SCHEDULE: CHARACTER AREA ANALYSIS

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SPD Supporting Evidence Document: Character Area Analysis

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
130	David	Hammond	Natural England		Character Area Analysis	Reference to Brompton Cemetery should include details of species present, including Bats.	No change necessary. The Character Area study focuses solely on the built environment, specifically heritage assets, urban character and townscape issues. The Ecology Study notes the species present in the cemetery and emphasises its value as a site for bats.
479	Tony	Hunter			Character Area Analysis	<p>[bold] 4.Character Area Analysis (particularly pages 62 63 and 74); and Development Scenarios [end bold]</p> <p>[bold] The building heights in Cluny Mews are currently, and should remain, 1 to 20 metres - one of two office storeys and one of four office storeys and the building massing should be no greater than the buildings on the site at present. [end bold] Four storeys is the height of the highest existing office building and the highest adjoining houses. [bold] This should be made clear to avoid any monolithic new buildings which would inevitably be unsuitable for the context of this unique corner of Earls Court; and would lead to an unacceptable loss of amenity, increased sense of enclosure, and further overlooking and invasion of privacy. It should also be noted here that some of the houses in this part of Philbeach Gardens are only three storeys and should not be represented in the SPD as higher than they actually are. [end bold]</p> <p>Indeed the current developers themselves have said that they are revising their own plans to "reduce the impact of the proposed buildings on existing properties" and be in keeping with the existing situation per their attached plan revision. [bold] On the basis that the landowners and the neighbouring residents are all of the view that the building heights should remain as per the modern buildings there at present, the SPD should not be used as a back route for these previous recent permissions, which were hard fought over at the time (as detailed in my letter to RBK&amp;C regarding the ECP planning application), to be ignored and run roughshod over. [bold] This is the only way in which the context will not be further negatively impacted; privacy (from commercial buildings) further breached; overlooking and sense of enclosure further increased; and amenity further lost - compared to the recent modern development already and only relatively recently permitted. The SPD should stop this, not encourage it and therefore be amended accordingly.</p>	No change necessary. The SPD does not prescribe any specific building heights. Building heights in Cluny Mews will be subject to the same Key Principles as any other buildings proposed for the OA. Most significantly, Key Principle UF19 expects the character, appearance and setting of nearby conservation areas and listed buildings to be preserved or enhanced, Key Principle UF21 expects applicant(s) to demonstrate that their proposals have no negative impacts on the views identified by the authorities in the Townscape and Visual Analysis Supporting Evidence Document (see in particular view 14), and Key Principle UF26 which requires the heights and massing of new buildings on the edges of the OA to respect the scale and massing of neighbouring buildings.
1565	Claire	Craig	English Heritage		Character Area Analysis	We recommend that the SPD consider how the surrounding heritage assets inform the character of that urban fabric more closely. In the Character Area Analysis report (CAA) for the SPD we note that heritage assets appear to have been considered after the urban design observations for each Character Area. We recommend that the heritage assets clearly form part of the material that is considered in determining the parameters of each character area, and again when developing the urban design observations for each of those areas. If this is not done, a valuable layer of analysis will have been missed in developing the SPD.	No change necessary. Although the heritage assets are presented at the end of each of the character areas, this does not reflect the consideration that they were given in the drafting of this document.
1566	Claire	Craig	English		Character Area Analysis	The lack of integration of historic characteristics and heritage assets into	Change proposed. The character areas were determined based on a number of

			Heritage		<p>the urban design observations makes it difficult to understand the rationale for determining the parameters of the character areas. For example, on what basis has the Seagrave Road site been made into a distinct character area as opposed to being made part of the Fulham Character Area or defined as part of a larger area of eroded character along the flank of Brompton Cemetery? The first sentence in paragraph 1.0 in the Overview of the CAA on page 2 also begs the question of how the OA was divided into character areas; again, on what basis?</p>	<p>parameters. The primary driver was the heritage assets, as the intention was to ensure that each character area was based around at least one conservation area. If there was more than one, we looked to ensure that they were of a similar character and/or appearance. However, drawing the character area boundaries based on conservation areas alone proved to be insufficient because it produced some character areas that were made up of contrasting urban forms. Therefore, parameters such as the urban grain, predominant building typology, scale and mass of buildings, position and role in the local street hierarchy and mix of land uses were also used to define more considered character areas. The Seagrave Road site was made into a distinct character area simply because of the specific requirements of the Earl's Court Project. It was decided that it could not be treated in the same character area as the rest of the Opportunity Area because it does not share any of heritage assets or urban characteristics with the main site. However, it was also felt that as part of the Opportunity Area, it should also be distinct from the Fulham character area or the Brompton Cemetery and the Boltons character area. In order to clarify this, a page describing how each of the character areas was defined will be added to the introduction of the Character Area Analysis SPD Supporting Evidence Document.</p>
1567	Claire	Craig	English Heritage	Character Area Analysis	<p>Furthermore, while the analysis of the Fulham Character Area recognises that it contains three conservation areas, there is no recognition of what the significance of those conservation areas is to the character of the area. It should be possible from reading the Character Profiles of the Conservation Areas to glean important information that not only informs understanding of the character area but also that can constructively influence the OA. Our publication Conservation Principles (April, 2008) outlines how the significance of heritage asset is attributable to four types of value - aesthetic, communal, evidential, and historical. The Character Profiles for the Conservation Areas in the Fulham Character Area, for example, provide a wealth of information about what creates the aesthetic value of these heritage assets. They include recognition of the following components and issues as integral to character, many of which might be added to the urban design observations to inform the SPD:</p> <ul style="list-style-type: none"> <li>- strong, elegant front boundaries;</li> <li>- uniform fenestration;</li> <li>- rich architectural detailing;</li> <li>- uniform mass, scale and rhythm;</li> <li>- rectangular paving stones, the colour of York stone;</li> <li>- trees;</li> <li>- key views; and</li> <li>- the need for more sympathetically designed lighting columns and lanterns.</li> </ul>	<p>Change proposed. The information contained within the Character Area Analysis is intended to be supplementary to the Character Profiles of the conservation areas. It would therefore unnecessarily lengthen the document to repeat information that can be found in the Character Profiles. In the final draft of the SPD, the importance of the Character Profiles and their potentially constructive influence in the OA will be specifically referenced in the Site Context chapter (page 39 of the main SPD document). The role of the Character Area Analysis as supplementary to the Character Profiles and Conservation Areas Proposals Statements will also be noted in the Overview of the Character Area Analysis SPD Supporting Evidence document.</p>
1568	Claire	Craig	English Heritage	Character Area Analysis	<p>Information can also be gleaned about the communal, evidential, and historical values of these conservation areas from the Character Profiles as well. For example, the Sedlescombe Road Conservation Area Character Profile identifies this place as representative of the philanthropic development in the Arts and Crafts style that was a feature of the Edwardian period. The Walham Grove Conservation Area Character Profile defines that development as late Victorian</p>	<p>Change proposed. The information contained within the Character Area Analysis is intended to be supplementary to the Character Profiles of the conservation areas. It would therefore unnecessarily lengthen the document to repeat information that can be found in the Character Profiles. In the final draft of the SPD, the importance of the Character Profiles and their potentially constructive influence in the OA will be specifically referenced in the Site Context chapter (page 39 of the main SPD document). The role of the Character Area Analysis</p>

					demonstrating that the Character Area blossomed at the turn of the 20th century. While the desire to ensure Empress Place provides a cultural destination is clearly, and appropriately, driven to provide continuity with the Earl's Court exhibition space, it also has an interesting resonance with the creation of the Oswald (artists') Studios as part of developing the Sedlescombe Road Conservation Area. Certainly, that conservation area provides a positive reminder about appropriate provision of the social infrastructure for new development.	as supplementary to the Character Profiles and Conservation Areas Proposals Statements will also be noted in the Overview of the Character Area Analysis SPD Supporting Evidence document.
1569	Claire	Craig	English Heritage	Character Area Analysis	English Heritage recommends that conservation staff for both the London Borough of Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea, are consulted as to how other conservation area appraisals might provide similar information for the other character areas in order to strengthen this analysis/evidence.	Change proposed. The information contained within the Character Area Analysis is intended to be supplementary to the Character Profiles of the conservation areas. It would therefore unnecessarily lengthen the document to repeat information that can be found in the Character Profiles. In the final draft of the SPD, the importance of the Character Profiles and their potentially constructive influence in the OA will be specifically referenced in the Site Context chapter (page 39 of the main SPD document). The role of the Character Area Analysis as supplementary to the Character Profiles and Conservation Areas Proposals Statements will also be noted in the Overview of the Character Area Analysis SPD Supporting Evidence document.