

London Borough of Hammersmith and Fulham  
Proposed Submission Local Plan

**Background paper: Tall Buildings  
September 2016**

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# TALL BUILDINGS

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## **1.0 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.

## **2.0 Document Purpose**

2.1 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.

2.2 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 within the existing townscape setting.

## **3.0 Tall Buildings Definition**

3.1 Tall buildings are defined in the London Plan as 'those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor' (the threshold for referral is 30 metres).

3.2 The LBHF Core Strategy glossary defines tall buildings as 'those that are substantially taller than their neighbours and/or which significantly change the skyline'. 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.

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

4.1 Historically, tall buildings within the borough 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.

4.2 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.

4.3 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.

4.4 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. 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.

4.5 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.

4.6 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.

4.7 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.

4.8 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.

4.9 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 areas within open space which provide some relief from the dense built environment. Particularly sensitive riverside views have been identified in the Local Plan. 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.

4.10 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, as 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 Fulham's townscape and open spaces suggests that tall buildings would generally be 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.

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

## 5.0 Policy Background

### London Plan – Strategic area based approach

5.1 Policy 7.7 of The London Plan ‘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.

5.2 The Policy goes on to list 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.

5.2 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.

5.3 The Plan goes on to address the issue of location and the policy and states that in preparing for Local Development Frameworks -

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.

The London Plan (2015) p285

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

5.5 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.

Commission for Architecture and the Built Environment (CABE) and English Heritage – area based approach

5.6 CABE and English Heritage have produced joint guidance on tall buildings. The guidance produced in July 2007 recognised that some local planning authorities “include specific policies relating to tall buildings in their development plans” and related documents, and “some identify geographical areas where tall buildings will or will not be appropriate based on thorough urban design analysis”

5.7 Para. 2.5 of the guidance states:

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. Such an approach will ensure that tall buildings are properly planned as part of an exercise in place-making informed by clear long-term vision.

5.8 Para. 2.7 goes on to state:

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.

5.9 In October 2014, English Heritage and the Design Council published a revised paper on Tall Buildings for consultation. 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.

5.10 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.

5.11 The revised document reinstates the general principals of the earlier document, but 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

5.12 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.

5.13 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".

5.14 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.

5.15 In June 2011 the council published its Core Strategy and identified tall buildings being those "which are significantly higher than the generally prevailing height of buildings in the surrounding area." It confirmed parts of the White City Opportunity Area... Earls Court and West Kensington Opportunity Area... limited parts of South Fulham Riverside and parts of Hammersmith Town Centre, as



areas where tall buildings may be appropriate. The Core Strategy also established that “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”.

5.16 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 that are significantly higher than the general prevailing height of the surrounding townscape and that have a disruptive and harmful impact on the skyline will generally be resisted by the council”. This policy goes on to list the criteria which every proposal for a tall building should make.

5.17 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

5.18 These policies have been consolidated in the Local Plan Review. 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 four areas in the Borough where, as a result of the new analysis, tall buildings may be appropriate:

- White City Regeneration Area.
- Earls Court & West Kensington Opportunity Area.
- South Fulham Riverside Regeneration Area
- Hammersmith Town Centre.

5.19 Other existing policies relating to tall buildings have been transferred in to the Local Plan document. Existing Policy DM G2, which highlights those aspects, should be addressed for any tall building proposal and included in Policy DC 3 and Policy DM G6, is now found in Policy DC 7.

## **6.0 Review of the Analysis**

6.1 The tall buildings study was originally undertaken in 2007 to review the current policy in 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.

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

6.3 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.

## **7.0 Methodology**

7.1 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.

7.2 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 and the South Fulham riverside. 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, could support the location of a tall building...
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 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. 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 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.

## 8.0 Results of the Analysis

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

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

8.2 From this analysis, there are four 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

## WHITE CITY

8.3 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 BBC Media Village and Imperial College's new campus under construction north of the A40, both have an important presence in the area.

8.4 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.

8.5 Proposals for tall buildings within the White City Regeneration Area (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.

8.6 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.

8.7 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.

8.8 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.

8.9 It should be noted that the acceptability of particular proposals for tall buildings will be considered in detail at planning application stage in accordance with the development plan and having regard to the urban design objectives of the OAPF.

8.10 A Townscape Views Analysis was commissioned to supplement the work already undertaken regarding the visual impact of taller buildings within the OA on surrounding areas. It provides a baseline study of 21 views from outside the OA and considered the impact to the townscape as a result of the development of 5 key sites within WCOA - Imperial West, the Dairy Crest site, Westfield, BBC TV Centre and the Marks and Spencer site.

8.11 This included views to and from Royal Borough of Kensington and Chelsea 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.

8.12 Buildings will be most visible from open spaces which afford panoramic views e.g. Wormwood Scrubs, Kensal Green Cemetery and Kensington Memorial Gardens. With only low level tree screening around their edges they afford views not only of the consented 35 storey tower on the Woodlands site and the approved 32 Storey tower on the Dairy Crest site, but many of the anticipated mid-rise buildings too. However many will be viewed in the context of other existing tall buildings, such as the Charecroft Estate Towers, Westfield Shopping Centre and BBC TV Centre.

8.13 Views from the northern part of the site from the east and west, e.g. from within the Oxford Gardens and the Wormholt and White City Conservation areas, two towers will be visible in views along the street grid whilst the mid-rise buildings will be largely obstructed or screened from view by existing buildings and tree cover.



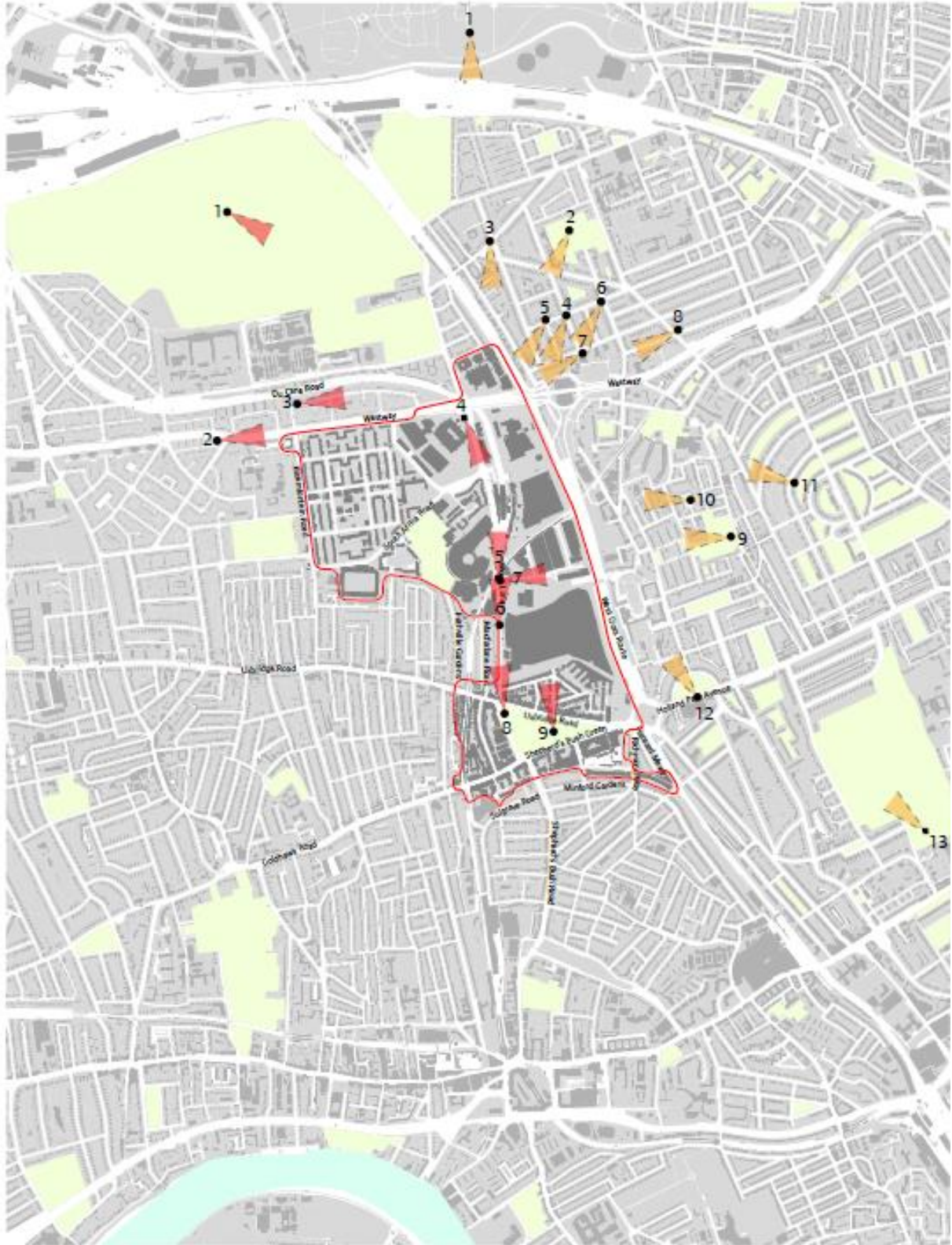


Figure 1.15 Views from Townscape Views Analysis

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GLA (LA100032379) 2011

8.14 From the south, the two tall towers are only prominent from the corner of Wood Lane and Uxbridge Road, and they create new distant landmarks as a focus for the regeneration of the area, and provide a visual link to the town centre. In other views from the south such as Shepherds Bush Common, new buildings will be completely or partially screened from view by existing development and mature trees. In Royal Crescent and Holland Park, buildings are largely obscured from view by existing buildings and mature trees.

8.15 Views of the central and southern part of the site from the west e.g. Avondale Park and Ladbroke Grove Conservation Areas, the towers are partially visible, being largely obscured by existing buildings and screened by mature trees.

8.16 A more detailed analysis with other views will likely be required with any particular proposal which comes forward as part of a planning application.

## **HAMMERSMITH TOWN CENTRE**

8.17 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.

8.18 Hammersmith Town Centre has a number of existing tall buildings, therefore further tall buildings of a similar height may be considered appropriate. Consistent built form would visually reinforce 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.

8.19 Any new buildings in this part of the town centre will need to respond to the current prevailing heights and make a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form. 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, views of the townscape 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**

8.20 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.

8.21 In parts of the proposed Earls Court and West Kensington Opportunity Area there would be scope for some tall buildings. The Earls Court Planning Framework identified that the area accommodates three significant tall buildings within the OA. These are:

- Empress State Building – 31 storeys

- Earls Court 1 - which is a maximum height of 63m Above Ordinance Datum <sup>1</sup>(AOD)
- Earls Court 2 – 44m Above Ordinance Datum

8.22 These are located on the eastern side of the OA. Buildings of these heights are atypical in the immediate surroundings. The Empress State Building is situated immediately to the west of Earls Court 2 and is the tallest building within the OA and indeed in much of West London.

8.23 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. The heights across the rest of the site are between 2 and 6 storeys and are more closely related to those prevailing in the surrounding area. In the surrounding area, building heights are related to building typology. The important residential typologies found around the OA include town houses, terraced town houses, mansion blocks, mews houses and infill blocks.

8.24 The Earls Court 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.

8.25 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. Buildings that are visible on the skyline can be harmful for listed buildings and their settings, conservation areas, historic parks and significant views. Development proposals, including those containing tall buildings, must respect the character and appearance of their surroundings.

8.26 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 will inevitably be visible and would be acceptable if sound urban design justification is provided. This justification should address how the alignment, spacing, height,

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<sup>1</sup> The Ordnance Datum is a set level above which all heights are measured. This means that the significant topographical changes across the OA do not affect the measurements.

bulk, silhouette, massing and design quality of proposals will be combined to enhance the skyline.

8.27 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.

8.28 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.

8.29 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.

8.30 The visual impact of tall buildings cannot be assessed in terms of bulk and massing alone. They must also be of excellent architectural quality. The facades of tall buildings need to be carefully articulated and animated. This can be achieved through the use of materials, colour, fenestration, reflectiveness and/or the expression of depth. Blank walls must be avoided. The authorities must be satisfied that any outline planning application for the OA that includes tall buildings as important elements within a robust and credible masterplan also puts in place parameters and design principles that will result in excellent urban design and architecture. To ensure the commitment to high quality can be realised through proactive control of reserved matters, the authorities will make these parameters and design principles a condition of any outline consent.



8.31 Whichever approach is taken tall buildings must appear 'well rooted' and their design must mediate between the large scale of the building itself, and the human scale of the public realm to which it relates. Active ground floor uses are essential. Tall buildings can also impact on the microclimate at street level. Their location and design must successfully mitigate for these effects. All applications will be expected to include analysis of daylight, sunlight and the overshadowing of surrounding open spaces and should demonstrate that they do not have a detrimental effect.

## **SOUTH FULHAM RIVERSIDE**

8.46 The river frontage in this area is some 1700m long. Significant parts 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

8.47 The Council are committed to ensuring South Fulham Riverside is designed to create a coherent and integrated place that contributes 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.

8.48 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.

8.49 Building height can be stepped up towards the riverfront. Here, the built form would need to provide a clear edge to the riverside walkway and associated public realm. 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.

8.50 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. 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.

8.51 The townscape analysis of the framework area suggests that South Fulham Riverside has two key focal points:

- Fulham Wharf - where the supermarket provides a focus of activity; and
- Imperial Wharf Station- based around the existing larger scale development and new station and park.

8.52 At Fulham Wharf, it would be appropriate to accommodate increased massing and height which is related more to the attraction and activity generated by the supermarket, the provision of increased connectivity and the provision of new riverside spaces. Fulham Wharf would become a point of townscape focus. The Imperial Wharf station location already supports development of an

increased massing and height, and this could be consolidated to achieve a coherent grouping.

8.53 It is in these locations where proposals for tall buildings could be considered. Any proposals for tall buildings in these locations would provide a positive statement in the regeneration area and are unlikely to cause harm to the heritage assets or their setting. Proposals for tall buildings would need to be accompanied by the appropriate townscape justification in accordance with the English Heritage / CABE guidance, and comprehensive impact studies. The designs would need to be appropriate in terms of proportion, silhouette and architectural quality.

8.54 Elsewhere in the framework area, the general scale, height, and massing should have a closer relationship to the existing townscape. There is a variation in building height in the area, and it would be appropriate for new development to adopt a similar variety of scale

8.55 In some limited locations higher buildings may be considered if it can be demonstrated that a taller building would be a key design element in a wider massing strategy and that it would have a positive relationship to the riverside. All new development should create a high quality urban environment and accord with the urban design principles of the Borough wide strategic policy on the built environment.



## 9.0 Conclusion

9.1 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 Local Plan Review, in particular Policy DC 3.