

Chris Banks  
C/O Banks Solutions  
Fish Island AAP Programme Officer  
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Date: 13th July 2012

Dear Mr Banks

**London Borough of Tower Hamlets Fish Island Area Action Plan DPD – Post-submission Position Statement**

Following English Heritage's representations on the submission version of the Fish Island AAP in January 2012 and the London Borough of Tower Hamlets' subsequent consultation response, this document seeks, for the inspector's consideration to further clarify English Heritage's and the London Borough of Tower Hamlets' position regarding the outstanding disagreement on an element of buildings heights policy within the AAP.

The table below sets out English Heritage's original representation, the consultation response from Tower Hamlets and further clarifications from English Heritage.

Yours sincerely

Nick Bishop  
Planning Advisor - LONDON

<b>English Heritage's original representation</b>	<b>LBTH response</b>	<b>English Heritage response</b>
<p>Policy FI 6.1 We welcome the establishment of appropriate buildings heights for each sub-area within Fish Island, including in Fish Island North. In paragraph 6 of this policy, however, where building heights above 6 storeys are supported, we would wish to see an explicit indication of the maximum height of taller buildings considered appropriate here. The policy, in its current wording, could allow for buildings which are taller than envisaged by the Council.</p>	<p>Noted. The height of a building will be assessed against the criteria in the Managing Development DPD policy DM26 and English Heritage/CABE 'Guidance on tall buildings' (2007). This will take account of design of the development and the context of the area.</p> <p>The Council recognises the potential to provide further detail on building heights through supplementary guidance. From 1<sup>st</sup> October 2012 the London Legacy Development Corporation (LLDC) will be the local planning authority having decision-making and plan-making powers. The Council will continue to work closely with the LLDC to explore the potential for supplementary guidance.</p>	<p>The adopted Core Strategy identifies tall buildings in Canary Wharf and Aldgate. We are pleased that, in the absence of a building heights SPG, the AAP sets out building heights guidelines to provide clarity on the heights of buildings considered appropriate in an area which isn't identified for tall buildings.</p> <p>However, the taller elements remain ill defined, and, notwithstanding the assessment of such elements against the criteria set out in Managing Development DPD, the AAP should provide a clearer steer on the maximum height which would be considered appropriate in the context of surrounding heritage assets, based on the urban design analysis undertaken for the AAP evidence base, including an understanding of impacts on the historic significance of surrounding heritage assets.</p> <p>Falling outside of the Core Strategy tall buildings areas, these taller elements shouldn't meet the definition of tall buildings, as set out the Core Strategy appendix, ie. They shouldn't be significantly</p>

		<p>taller than their surroundings nor have a significant impact on the skyline. A maximum height at which this would be considered to be the case would provide clarity.</p> <p>Under the NPPF, section 12, requires that local authorities “set out in their local plan, a positive, proactive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats. (paragraph 126)” The Fish Island AAP can achieve this, and assist the delivery of sustainable development (paragraphs 152 and 154) by articulating the height beyond which taller elements would no longer be acceptable when judged against the policies in the NPPF at the stage of development decision-making, due to unacceptable impacts on the historic environment.</p>
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