

STATEMENT OF COMMON GROUND

Between the London Borough of Tower Hamlets and English
Heritage

In respect of representations 146, 102, 153, 150, 151.

**London Borough of Tower Hamlets
Managing Development DPD
Local Development Framework**

Statement of Common Ground – English Heritage

LBTH Managing Development DPD Examination in Public

Date: 24th August 2012

Parties: LB Tower Hamlets and English Heritage

Attendees: Peter Farnham (LBTH)
Mark Hutton (LBTH)
Michael Bell (LBTH)
Nick Bishop (EH)

Issues Discussed

In relation to the representations submitted by English Heritage the following issues were discussed:

1. Building heights (DM26):
 - a. Suggest removal of indicative building heights diagram from Development Management DPD.
 - b. Suggest provision of a character based borough-wide plan-led approach for the borough closely tied to the character areas already established in the Core Strategy. This should provide clarity on borough-wide tall buildings aspirations, including clustering, undesirable taller elements and river frontages, for example, through the provision of a building heights SPD.
 - c. Suggest explicit commitment and deferral to a detailed building heights SPD to set out appropriate building heights for each character area, taking into account the environmental characteristics of each area, historic environment sensitivities, and the borough's aspirations.
 - d. Suggest that the tall buildings policy include a definition of tall buildings, consistent with EH/CABE's Guidance on Tall Buildings (2007), and the tall buildings policy contained in the 2010 London Plan, policy 7.7.
 - e. Suggest clarifying in the proposals map that the Preferred Office Locations refer to land use only, and do not imply particular building heights.
 - f. Suggest replacement/augmentation of the tall buildings evidence paper in the form of an evidence-based SPD.

Agreed Actions

- e. Suggest clarifying in the proposals map that the Preferred Office Locations refer to land use only, and do not imply particular building heights.
- LBTH to amend Figure 9 to ensure further consistency with the Core Strategy:

“Preferred Office Locations in Core Strategy tall building locations”

- b. Suggest provision of a character based borough-wide plan-led approach for the borough closely tied to the character areas already established in the Core Strategy. This should provide clarity on borough-wide tall

buildings aspirations, including clustering, undesirable taller elements and river frontages, for example, through the provision of a building heights SPD.

- c. Suggest explicit commitment and deferral to a detailed building heights SPD to set out appropriate building heights for each character area, taking into account the environmental characteristics of each area, historic environment sensitivities, and the borough's aspirations.
- f. Suggest replacement/augmentation of the tall buildings evidence paper in the form of an evidence-based SPD.

- LBTH to add an additional sentence to the end of paragraph 26.1 to state:

“This is supported by existing supplementary guidance; future supplementary guidance may also be developed by the Council to provide additional detail”

- d. Suggest that the tall buildings policy include a definition of tall buildings, consistent with EH/CABE's Guidance on Tall Buildings (2007), and the tall buildings policy contained in the 2010 London Plan, policy 7.7.

- LBTH confirms that the EH/CABE definition for tall buildings is stated in the Core Strategy Glossary of Key Terms. To ensure consistency, LBTH will refer to the definition in paragraph 26.1 after the second sentence:

“The English Heritage & CABE “Guidance on Tall Buildings” (2007) is used to provide the definition of a tall building.”

Outstanding Issues

- a. Suggest removal of indicative building heights diagram from Development Management DPD.

- LBTH maintains its position that Figure 9 is required to help manage building heights in the borough.
- LBTH reiterate that the guidance provided in Figure 9 is indicative. It provides an indication of the heights likely to be acceptable in the absence of more detailed guidance. The guidance is provided to balance the requirements of statutory stakeholders, developers, landowners and residents.

Statement in Support of finalised policy

English Heritage/CABE's Guidance on Tall Buildings (2007) advocates a development plan-led approach to tall buildings (paragraph 2.6). Amongst other benefits, this helps protect the historic environment and the qualities which make the borough special, and enables proper public consultation at the plan-making stage on the fundamental questions of principle and design. Paragraph 2.7 recommends that, as a matter of good practice, local authorities should carry out a detailed urban design study to ascertain where tall buildings would and would not be appropriate.

Policy 7.7 of the London Plan (2011) states that:

A) 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.

C) 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; and

English Heritage has worked with London Borough of Tower Hamlets to ensure best practice compliance with this approach in the production of their Local Plan.

At Core Strategy level the Local Plan identifies areas appropriate for tall buildings in Canary Wharf and Aldgate. At development management level this is supported with a criteria-based approach, rooted in the local design policy and EH/CABE Guidance.

English Heritage has been encouraging the borough, as best practice and in line with paragraph 2.7 of the EH CABE Guidance, to produce a more detailed urban design study as the evidence base for more detailed guidance on tall buildings to inform area-based policy – site allocations AAPs, planning briefs. The Borough has agreed that such guidance may be useful in future, where necessary, but, for the purposes of the Managing Development DPD, has set refined the plan-led approach set out in the Core Strategy by aligning building heights to the town centre hierarchy, based on a piece of work carried out for the purpose, the Building Heights Note (April 2012). While English Heritage would prefer a more detailed urban design study to be carried out as the basis for more localised policies, we support the town-centre approach as appropriate to development management DPD level, and in view of the potential for future guidance to be developed.