

POSITION STATEMENT

English Heritage – LBTH Response

In respect of Sessions 3 and 5
Issue 4 - Hackney Wick Hub and Fish Island North
Issue 6 – Fish Island Mid

**London Borough of Tower Hamlets
Fish Island Area Action Plan
Local Development Framework
13 July 2012**

Sessions 3 and 5 – English Heritage – LBTH Response Statement

This statement provides the Council's response to the issues stated within English Heritage's Position Statement the Fish Island AAP Examination in Public. It does not seek to repeat information relating to the Council's position as stated elsewhere.

Issue 1

Extract from Position Statement

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.

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 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.

LBTH Response

1.1 Disagree. The Council views the level of guidance provided for building heights to be appropriate for Strategic Policies within an Area Action Plan. Where appropriate, additional building heights guidance is given for Opportunity Sites. In addition to this, 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.

1.2 The Council recognises the potential to provide further detail on building heights through supplementary guidance. From 1st 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.

Issue 2

Extract from Position Statement

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.

LBTH Response

2.1 Noted. The Council views the existing policy to be consistent with the NPPF.