



ENGLISH HERITAGE



Consultation on revised Tall Buildings advice: Consultation Questions

English Heritage and Design Council have reviewed the joint CABE English heritage guidance on tall buildings of 2007. We are now consulting on a revised document called Tall Buildings which gives advice on the heritage and design issues related to tall buildings in the planning system.

Please submit your responses to the questions asked and/or comments by 30 November 2014 to tall.buildings@english-heritage.org.uk . If you do not have access to email, please provide them in writing to: Tall Buildings Consultation, Government Advice Team, English Heritage, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST.

To assist you in commenting on the Tall Buildings advice, we are the following questions:

Consultation questions

1. Do you agree that the present document needs updating to align it with the NPPF?

Yes No

Comment

And, as the new document does, remove references to superseded Government policy.

2. The new document has three key sections: *Tall Buildings and Local Plans*; *Making a Planning Application*; *Appraising Proposals*. Do you agree that this revised layout is helpful to the different audiences it is aimed at?

Yes No

Comment

The document it is to replace was less good at this. The new draft focuses attention quite well. But please see our suggestion at 6 and 7 below.

3. Does **Section 3 Tall Buildings and Local Plans** help local planning authorities make the case for:

i) including tall buildings policies in the local plan linked to an overarching development control policy in the core strategy

ii) carrying out a heritage assessment as part of the evidence base, to help inform the selection of areas where tall buildings would be appropriate?

Yes No

Comment

We welcome the hierarchy of advantages which places first the need for vision and the protection of the qualities of the place.

4. Does **Section 4 Making a planning application** help applicants and their agents to:

i) understand the policy context for their site and help inform the design process,

ii) engage with the local planning authority and other parties at pre-application stage, and

iii) know what information is likely to be needed to support a planning application

Yes No

Comment

Proposals for tall buildings are usually made by developers of considerable substance with a wide range of professional disciplines in attendance. They do not need "nitty-gritty" assistance to help them through the process. The broad-brush approach to the topic in the draft is appropriate.

5. Is **Section 5 Assessing proposals** helpful to officers and elected members in understanding the need to give due weight to the historic environment and design issues when making decisions on tall buildings applications as part of delivering sustainable growth.

Yes No

Comment

Broadly. We welcome the attention given to the historic environment but are concerned that the more detailed wording contained in paragraph 4.1.2 of the previous guidance has not been repeated. We think it is important to reiterate these points in section 5 and not leave them to a general reference back.

6. Would having a checklist of questions that both applicants and local planning authorities need to think about when considering a tall building application help with negotiations and the decision-taking process? We already identify paras 4.3-4.7 as a checklist for applicants and for local authorities to use when assessing an application.

Yes No

Comment

As the issues requiring consideration do not alter throughout the process, a checklist (perhaps as an appendix or better in an early section of the document) applying to all the stages (pre-app, design, LPA assessment) would be appropriate. There would then be no scope uncertainty because of different forms of words being used in different parts of the document.

7. Are there any other issues you think this guidance does not cover adequately?

Yes No

Comment

It is not clear to us that there are many LDFs with tall buildings policies. The Guidance rightly deals with the desirability of such policy but should perhaps promote itself as the proper methodology in the absence of such policy.

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