



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](mailto: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

We agree that an update is helpful. However, instead of creating an entirely new document, we suggest that it would be more helpful simply to make any necessary revisions to the CABE/EH *Guidance on Tall Buildings July 2007* document. This has become a well established tool in development control decisions - in particular those made via appeal and call-in inquiries. That document creates, particularly in section 4, an objective set of criteria for assessing tall building proposals. These same criteria are reflected in the consultation document but in a way that is not as clear or as detailed.

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

We consider that the layout of the July 2007 document was clearer than the present consultation document.

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

The new reference to the duty to consult is helpful.

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

But we consider that the July 2007 document was clearer than the present consultation document in this regard, and query why a simply update of that document would not be a better way of framing the guidance.

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

We consider that the July 2007 document was clearer than the present consultation document in this regard, and query why a simply update of that document would not be a better way of framing the guidance.

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

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

Yes  No

Comment

To avoid confusion in the way in which the guidance is to be applied by planning decision takers, it would be useful to make it clear that the criteria for assessment of tall buildings are matters which determine whether a proposal is acceptable *to the Design Council and EH*. Such a qualification was included in paragraph 4.4 of the July EH/CABE document but is absent from the analogous paragraph (5.9) in the consultation document.

A planning decision taker will of course need to base a planning decision on a balance of considerations. This will of course include the guidance, but will also

include the development plan and the NPPF itself, and in particular the latter's "presumption in favour of sustainable development".

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