



Historic England

LONDON BOROUGH OF HARINGEY LOCAL PLAN EXAMINATION

DEVELOPMENT MANAGEMENT DPD

STATEMENT BY HISTORIC ENGLAND

ISSUE: CHAPTER 02 DESIGN AND CHARACTER

Hearing Session – Thursday 25th August 2016

References:

Pre-Submission Version Development Management DPD January 2016 – Policy DM6

Urban Character Study Haringey Council February 2015

Potential Tall buildings Location Validations Study Haringey Council November 2015

Tall Buildings Historic England Advice Note 4 December 2015

Introduction

1. Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). In carrying out our role in protecting and managing the historic environment, Historic England gives advice to local planning authorities on certain categories of applications (planning and listed building consent applications), appeals and other matters affecting the historic environment.
2. Historic England is consulted on Local Development Plans under the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012 and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.
3. Historic England's representations in relation to the Pre-submission Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development and the specific policies relevant to the historic environment.
4. This statement addresses the Inspector's questions with regards to issues identified in Chapter 02 Design and Character. Specifically, it further clarifies Historic England's advice on the proposed wording of policy DM6 Building Heights and its compliance with national policy and our Tall Buildings Advice Note on the planning for, and management of, building heights and tall buildings.

Inspector's Question 4 - DM6 – Part B:

The term 'community benefit' is not clear, nor is it explained in the text. What is it? Does the Council intend that for every 'taller' building, a 'community benefit' (whatever that may be) is derived, if so, where is the justification for this?

5. Historic England would seek to ensure policy DM6 is in compliance with national policy (e.g. NPPF) and National Planning Policy Guidance (NPPG) in conserving and enhancing the historic environment, in particular in the consideration of proposals such as "tall" and "taller" buildings and their impact upon the significance of heritage assets. National policy recognises the need for proposals to avoid causing harm to the significance of heritage assets, and where harm is proposed then this needs to be clearly and convincingly justified (NPPF para 132).
6. Where harm is caused then national policy introduces the concept of "public benefit" that may justify the causing of harm to the significance of heritage assets, including their setting.

In the case of where there is substantial harm or total loss of significance of a designated heritage asset then the proposal needs to demonstrate two key tests. First the harm is necessary and second the public benefits achieved are substantial and out weight the harm caused to the significance of the designated heritage asset (NPPF para's 132-133). Where the harm is less than substantial then the test is lessened to the weighting of the harm against the public benefits. The NPPG provides further clarification of what is meant by public benefit in that they should "flow" from the proposed development, and be of a nature or scale to be of benefit to the public at large.

Recommendation

7. Historic England would advise that unless clearly defined in the Local Plan the use of "community benefit" in Part B of DM6 is open to misinterpretation and in its current form does not fully comply with public benefits as defined by national policy and guidance. In addition its potential application could also conflict with the conservation and enhancement of the historic environment as intended in Part B subset c of DM06. To address these concerns we would suggest that the term "community benefit" is amended to "public benefit" so ensuring its interpretation and use is aligned with national policy and guidance. This approach would also help ensure the consideration of "taller" buildings is assessed in the context of positive proactive management of the Borough's heritage assets.

Inspector's question 5 – DM6 – Part C:

Is this policy too restrictive? It uses the words 'only be acceptable', implying that everywhere else tall buildings will be unacceptable. Is that the case? Where is the justification showing that tall buildings are unacceptable elsewhere?

8. Historic England in December 2015 updated its guidance on tall buildings entitled *Tall Buildings Historic England Advice Note 4*. In line with national policy the *Advice Note* promotes the need for a plan-led approach to managing tall buildings. This includes the undertaking of a robust assessment of the characteristics (including its heritage interest and significance of heritage assets) of the Borough as a baseline in which to identify potential locations for tall buildings. The principal evidence provided by the Council is the *Urban Character Study* (Haringey Council - February 2015) and *Potential Tall buildings Location Validations Study* (Haringey Council - November 2015). The *Urban Character Study* provides a good starting point in which to understand the Borough's characteristics and potential for change, whilst the *Location Validations Study* takes account of the some key heritage assets when identifying potential locations for tall buildings. However as expressed in our response to the pre-submission version of the Development Management DPD, the significance of all heritage assets appears not to have been considered sufficiently.

Recommendation

9. On the matter of tall buildings, as a whole, as raised in our response to the pre-submission version of the Development Management DPD, we would suggest that there is a need to provide additional information in the supporting text of policy DM6 to further explain the application of the policy, especially in the context of Part C. The “general recommendations” in Section 7 of the *Urban Character Study* includes more details on how proposals for tall buildings should be assessed and implemented. The recommendations set out in this section (points 1-9) should be fully carried over into the supporting text. In particular the definition used in the *Urban Character Study*, which is not fully expressed in the DPD. In addition the need for both “tall” and “taller” buildings to respond to the setting of a place, be supported by a clear design and contextual rationale, be sensitive to existing building heights, and demonstrate an understanding and an avoidance of causing harm to the significance of heritage assets.
10. Developing the details of the supporting text from the evidence and analysis gathered should help clarify the approach of limiting “tall” buildings to specific areas of the Borough, and help provide clarity on the management of “taller” buildings across the Borough. This should be further supported by a need for proposals to be considered against gathered detailed site specific analysis as contained in the *Urban Character Study* and relevant heritage appraisals and management plans (e.g. conservation area appraisal and management plans, listed building management plans, etc..).
11. However at this stage we would seek further assessment of the significance of all heritage assets potentially affected, so that the Tall Building Growth Areas identified do not cause harm to their significance in line with national policy. This includes consideration of all heritage assets potentially affected within, and outside, of the Tall Building Growth Areas.