

# Guidance on tall buildings

## Consultation draft January 2007

CABE and English Heritage have reviewed and updated their joint *Guidance on tall buildings*, first published in 2003, to reflect changes to the planning system and their experience of evaluating planning applications for tall buildings. The revised document, which appears here in consultation form, will supersede the previous guidance. Information about the consultation on the revisions to the guidance can be viewed on the English Heritage and CABE websites.

Responses are invited by 1 May 2007.



ENGLISH HERITAGE



## 1 Evaluating tall buildings proposals

### 1.1

Cities and their skylines evolve. In the right place, tall buildings can make positive contributions to city life. They can be first-rate works of architecture in their own right; some of the best post-war examples are now listed buildings. Individually, or in groups, they affect the image and identity of a city as a whole. In the right place they can serve as beacons of regeneration, and stimulate further investment. The design and construction of innovative tall buildings can also serve to extend the frontiers of building and environmental technology.

### 1.2

However, by virtue of their size and prominence, such buildings can also harm the qualities that people value about a place. Where tall buildings have proved unpopular, this has generally been for specific rather than abstract or general reasons. In many cases one of the principal failings is that many were designed with a lack of appreciation or understanding of the context in which they were to sit. There have been too many examples of tall buildings that have been unsuitably sited, poorly designed and detailed, badly built or incompetently managed (although this has been equally true of many low-rise buildings). The existence of a tall building in a particular location will not of itself justify its replacement with a new tall building on the same site or in the same area. The same process of analysis and justification should be required.

### 1.3

Policies derived from sustainability and demographic considerations tend to support increased density. In some cases the desire for high-density development has been used to support proposals for tall buildings. However, it is clear that tall buildings represent only one possible model for high-density development. While tall buildings with a large total floor area have a correspondingly large impact on their location in terms of activity and use, this can be equally true of large and dense developments which are not so tall. In both cases there are likely to be positive and negative effects. Projects need to be considered in the round.

### 1.4

*Planning policy statement 1 (PPS1)* states that design should take the opportunities available for improving the character and quality of an area and the way it functions. This key test applies to all development proposals, including tall buildings. CABE and English Heritage will therefore assess proposals in terms both of the contribution and any adverse impacts which they may bring. These proposals should be considered as pieces of architecture in their own right, and as pieces

of urban design sitting within a wider context; and in this respect they should be assessed in the same way as any other project, and against the most demanding standards of quality. The CABE publication *Design review* sets out CABE's method of evaluating designs. English Heritage is publishing *Conservation principles*, by which it will evaluate the impacts of development on the historic environment early in 2007.

## 2 Planning policy

### 2.1

The planning and design of tall buildings has to take into account many components of national, regional and local planning policy. *PPS1: delivering sustainable development*, which underlines the importance of good design in securing high-quality, inclusive, safe and sustainable developments that show respect for their surroundings and context, and *Planning policy guidance note 13 (PPG13): transport*, will always be relevant. *PPG15: planning and the historic environment* and *PPG16: archaeology and planning* are likely to be relevant in most cases. *PPS3: housing*, which requires the provision of high quality, well-designed housing in locations with good access to social and physical infrastructure, will apply to all new residential development. *PPS6: planning for town centres* will be relevant to office development. Meeting targets for carbon emissions and renewable energy, as set out in *PPS22: renewable energy*, regional and local planning policy, is also a particular challenge for tall buildings. Regional spatial strategies will also need to be taken properly into account. The *London Plan*, adopted in 2004, contains policies that relate directly to locations where tall buildings may be acceptable and the management of views in the capital. The emerging *London view management framework* supplementary planning guidance, which, when formalised, will supersede *Strategic view directions* (RPG Annex A November 1991), will be particularly important to explain how designated views are to be managed. The increasing recognition of the importance of design quality as a consideration within the planning system, referred to above, is set out in *PPS1* and *By design* (DETR/CABE 2000).

### 2.2

At present, local planning authorities in England vary in the extent to which specific tall buildings policies are contained in plans, or are amplified in supplementary planning documents. Where plans specifically address tall buildings, some identify geographical areas where tall buildings will or will not be appropriate based on thorough urban design analysis.

### 2.3

Government policy is to get the right developments in the right places. It states that all new development including tall buildings should be of excellent architectural quality and designed in full cognisance of its likely impact on the immediate surroundings and the wider environment. The government encourages local planning authorities to identify suitable locations where tall buildings are, and are not, appropriate, in areas where such developments are a possibility.

### 2.4

Both CABE and English Heritage strongly endorse this approach, and recommend that local planning authorities identify appropriate locations in development plan documents. These should be drawn up through effective engagement with local communities and with proper regard to national and regional planning policies and matters such as the local environment. Such an approach will ensure that tall buildings are properly planned as part of an exercise in place-making informed by a clear long-term vision, rather than in an ad hoc, reactive, piecemeal manner.

### 2.5

A development plan-led approach to tall buildings:

- enables areas appropriate for tall buildings to be identified in advance of specific proposals within the local development framework
- enables the spatial, scale and quality requirements for new tall buildings to be established within the local development framework
- ensures an appropriate mix of uses is considered
- enables proper public consultation at the plan-making stage on the fundamental questions of principle and design
- reduces the scope for unnecessary, speculative applications in the wrong places
- protects the historic environment and the qualities which make a city or area special
- highlights opportunities for the removal of past mistakes and their replacement by development of an appropriate quality
- sets out an overall vision for the future of a place.

### 2.6

Local planning authorities will need to consider the scope for tall buildings, where they are a possibility, as

part of strategic planning. This may include how they contribute to areas of change. In identifying locations where tall buildings would and would not be appropriate, local planning authorities should, as a matter of good practice, carry out a detailed urban design study. This should:

- take into account historic context through the use of historic characterisation methods of the wider area (the English Heritage publications *Conservation bulletin issue 4: characterisation, using historic landscape characterisation* and the forthcoming *Using urban characterisation*, provide useful guidance)
- carry out a character appraisal of the immediate context, identifying those elements that create local character and other important features and constraints, including:
  - natural topography
  - urban grain
  - significant views of skylines
  - scale and height
  - streetscape
  - landmark buildings and areas and their settings, including backdrops, and important local views, prospects and panoramas.
- identify opportunities where tall buildings might enhance the overall townscape
- identify sites where the removal of past mistakes might achieve a similar outcome.

### 2.7

Having identified the constraints and opportunities through an urban design study, specific policies and locations should be included in development plan and supplementary planning documents clearly identifying, in map-based form, areas that are appropriate, sensitive or inappropriate for tall buildings. In some places, historic environment considerations may be of such significance that no tall buildings will be appropriate.

### 2.8

In areas identified as appropriate, or sensitive, to tall buildings, local authorities should consider commissioning more detailed, three-dimensional urban design frameworks to be adopted as supplementary planning documents as support policies to core strategies and/or as area action plans. The potential impact of buildings of various heights and forms can be modelled to assess their effect on context including on other local authority areas, and on each other. This should help to inform the decision-making and place-making process.

## 2.9

Local planning authorities will have to address issues relating to tall buildings as part of the strategic environmental assessment (SEA) of their plans and programmes in areas where significant levels of development are proposed.

## 3 Planning applications

### 3.1

The Planning and Compulsory Purchase Act (2004) sets out the requirement for applications for both outline and full planning permissions to be accompanied by a design and access statement. This must explain and justify proposals and may be used as a basis to control any matter reserved by planning condition or reserved matters approval. The statement accompanying outline applications must also explain the process and principles that will be followed at reserved matters stage. *Design and access statements: how to write, read and use them* (CABE 2006) and *Circular 01/06: guidance on changes to the development control system* (DCLG 2006) provide guidance on matters to be covered by the statement. The greater the size and impact of a project, the more comprehensive this statement needs to be. Because of the intensity of land use which they represent, and because of the degree of change to the environment which their construction will bring about, both CABE and English Heritage look to local planning authorities to require all applicants for major tall buildings to present their proposals in the context of their own urban design study for the immediate and wider areas affected, and to demonstrate how their proposals respond to local planning authority studies where they exist, including a character appraisal. *By design* contains useful advice on the objectives of urban design and other considerations which should inform such a study, and on the preparation of a design and access statement. Where there are concurrent proposals for other tall buildings, or where others are likely to follow, the potential cumulative effect of these should be addressed by the study.

### 3.2

Without representational material of appropriate scope, quality, clarity and detail, it is not possible to assess the architectural quality of a tall building or its effect on the immediate and wider context. Local planning authorities should therefore advise applicants during pre-application discussions what visual material will be required to determine any application, identifying views they consider significant and defining appropriate visualisation techniques. In many cases, studies showing what a scheme would look like in context at

varying heights or a physical model of a tall building in relation to the wider area may be helpful. The level of detail and range of material required will depend on the size and effect of the proposals, and the stage reached in the design process.

### 3.3

All proposals for tall buildings should be accompanied by accurate and realistic representations of the appearance of the building. These representations should show the proposals in all significant views affected, near, middle and distant, including the public realm and the streets around the base of the building. This will require methodical, verifiable 360 degree view analysis. Where a tall building is justified by its relationship to a cluster, the proposals should be illustrated in the context of proposed and approved projects where this is known, as well as the existing situation. The appearance of materials should be accurately rendered in a range of weather and light conditions, although applicants and local planning authorities should be aware that visualisation techniques will not precisely replicate how the proposals will appear to the human eye.

### 3.4

Planning applications for tall buildings are likely to require a full environmental impact assessment (EIA). The planning authority must ensure that the environmental statement that will normally accompany applications addresses the likely significant environmental effects of a tall building proposal and must be confident that a proper analysis has taken place.

### 3.5

On the rare occasions where outline applications may be acceptable (see 5.1 below), the environmental statement may still require a significant amount of detail. Outline planning applications for tall buildings will need to include a comprehensive assessment of the site context and a visual impact assessment based on maximum and minimum scale parameters as part of the EIA. A separate further EIA may also be required for reserved matters applications.

## 4 Criteria for evaluation

### 4.1

Criteria for evaluating tall building proposals are set out in this section. It is not considered useful or necessary to define rigorously what is and what is not a tall building. It is clearly the case that a 10-storey building in a mainly two-storey neighbourhood will be thought of as a tall building by those affected, whereas in the centre of a large city it may not. The criteria below are

relevant to buildings which are substantially taller than their neighbours and/or which significantly change the skyline. The criteria are not listed in order of importance; the relative importance will depend on the circumstances of the site and the project. In the case of exceptionally tall buildings, some of the criteria will apply over a wide geographical area, and it will be necessary for the applicant's urban design study, referred to above, to address this. Applicants seeking planning permission for tall buildings should ensure therefore that the following criteria are fully addressed:

**4.1.1 The relationship to context**, including natural topography, scale, height, urban grain, streetscape and built form, and the effect on the skyline. Tall buildings should have a positive relationship with relevant topographical features and other tall buildings; the virtue of clusters when perceived from all directions should be considered in this light.

**4.1.2 The effect on the whole existing environment**, including the need to ensure that the proposal will preserve and/or enhance historic buildings sites, landscapes and skylines. Tall buildings proposals must address their effect on the setting of, and views to and from historic buildings, sites and landscapes over a wide area including:

- World Heritage sites and their settings, including buffer zones
- Scheduled ancient monuments
- Listed buildings
- Registered parks and gardens, and registered battlefields
- Archaeological remains
- Conservation areas
- Other open spaces, including rivers and waterways
- Other important views, prospects and panoramas.

**4.1.3 The effect on World Heritage sites.** The government has an international obligation to protect the outstanding universal value of World Heritage sites as defined by their specific statement of significance. Part of this obligation is the adoption of a management plan for the World Heritage site, including the buffer zone, by stakeholders. The statement of significance and the management plan are key material considerations in the planning process.

**4.1.4 The relationship to transport infrastructure**, aviation constraints, and, in particular, the capacity of public transport, the quality of links between transport and the site, and the feasibility of making improvements, where appropriate. Transport is important in relation to tall buildings because of the intensity of use, as well as density, that they represent.

**4.1.5 The architectural quality of the building** including its scale, form, massing, proportion and silhouette, facing materials and relationship to other structures. The design of the top of a tall building will be of particular importance when considering the effect on the skyline.

**4.1.6 The sustainable design and construction** of the proposal. For all forms of development, good design means sustainable design. Tall buildings should set exemplary standards in design because of their high profile and local impact. Proposals should therefore exceed the latest regulations and planning policies for minimising energy use and reducing carbon emissions over the lifetime of the development. The long-term resource and energy efficiency of tall buildings will be enhanced if their design can be adapted over time.

**4.1.7 The credibility of the design**, both technically and financially. Tall buildings are expensive to build, so it is important to be sure that the high standard of architectural quality required is not diluted throughout the process of procurement, detailed design, and construction. Location, use, the commitment of the developer, and ability and expertise of the consultant team will have a fundamental bearing on the quality of the completed building.

**4.1.8 The contribution to public spaces and facilities**, both internal and external, that the development will make in the area, including the provision of a mix of uses, especially on the ground floor of towers, and the inclusion of these areas as part of the public realm. The development should interact with and contribute positively to its surroundings at street level; it should contribute to safety, diversity, vitality, social engagement and 'sense of place'.

**4.1.9 The effect on the local environment**, including microclimate, overshadowing, night-time appearance, vehicle movements and the environment and amenity of those in the vicinity of the building.

**4.1.10 The contribution made to the permeability** of a site and the wider area; opportunities to offer improved accessibility, and, where appropriate, the opening up, or effective closure, of views to improve the legibility of the city and the wider townscape.

**4.1.11 The provision of a high-quality environment** for those who use the buildings including function and fitness for purpose, as far as this is relevant to planning decisions.

## 4.2

In addition to these criteria, and going beyond the powers of their planning responsibilities, local authorities

will need to consider a range of broader issues including access, means of escape and public safety requirements. Applications should demonstrate that these issues have been taken into account as part of the overall design and development process.

#### 4.3

Major building projects offer opportunities to enrich the public realm in terms of external and internal space. In the case of many significant tall building proposals, it will be desirable to dedicate substantial parts of the ground floors, and possibly other lower levels, of tall buildings to public uses. Where appropriate, it should also be possible for members of the public to enjoy the views afforded from tall buildings. However, it may not be possible to achieve all of the desired benefits within the confines of the planning application site – for example, when the proposed building fills the site. In many cases, planning agreements (section 106 agreements) will be an important mechanism for delivering the public benefits, including the public realm treatment, of tall building proposals. Such agreements will often be the only way of ensuring that a tall building is integrated with its immediate surroundings in a satisfactory way at the lower levels.

#### 4.4

To be acceptable, any new tall building should be in an appropriate location, should be of first-class design quality in its own right and should enhance the qualities of its immediate location and wider setting. It should produce more benefits than costs to the lives of those affected by it. Failure on any of these grounds will make a proposal unacceptable.

## 5 Protection of design quality

#### 5.1

Proposals for tall buildings should not be supported by local planning authorities unless it can be demonstrated through the submission of fully justified and worked-up proposals that they are of excellent architectural quality and in the appropriate location. For this reason CABE and English Heritage consider that outline planning applications are appropriate only in cases where the applicant is seeking to establish the principle of a tall building as an important element within a robust and credible masterplan for an area to be developed over a long period of time. In those cases, it is critical that the planning authority makes the principles established in the design and access statement a condition of planning approval to ensure that high quality can be achieved through proactive control of reserved matters.

#### 5.2

Where full planning permission for a tall building is to be granted, the detailed design, materials and finishes, and treatment of the public realm should be secured through the appropriate use of planning conditions and obligations, including section 106 agreements, where appropriate. Adequate guarantees are essential to maintain the original architectural quality and ensure that inferior details and materials are not substituted at a later date.

## 6 Consultation with CABE and English Heritage

#### 6.1

CABE and English Heritage have an important role to play in evaluating tall building proposals, which are usually of more than local significance. Both organisations recognise the importance of managing change in the built environment to continually improve its quality. Their different roles and remits are complementary. In assessing major proposals for tall buildings, the two bodies liaise and take into account each other's views when arriving at their own conclusions. However, there may be occasions on which the two bodies arrive at different conclusions about a particular proposal.

#### 6.2

The statutory function of CABE is to promote high standards in architecture and the design of the built environment across England. CABE is a non-statutory consultee in the planning process. When reviewing projects, CABE provides expert advice on whether a tall building proposal, in the round, is an excellent piece of architecture and urban design. CABE is producing *Design review-ed: tall buildings* (due for publication 2007), a document that will draw lessons from tall building projects it has reviewed.

#### 6.3

English Heritage's statutory responsibilities include the preservation and enhancement of the historic environment, and it is a statutory consultee in the planning process. As the government's advisor on the historic environment, its remit will be to assess whether the impact of the proposal is acceptable in terms of its effect on the wider local environment. That assessment should first establish whether the site is an appropriate one for tall buildings and only then address other factors including design quality as a response to its context.

## Consultation with CABE

### 6.4

A letter from the Department for Communities and Local Government to planning authorities (December 2006) and *DCLG Circular 01/06* (para 76) set out the criteria for consulting CABE about new building proposals. Most tall building projects are likely to come within one or more of these criteria, which include 'proposals which are significant because of their size'. Details of this, and of the operation of CABE's design review function, are given on CABE's website, [www.cabe.org.uk](http://www.cabe.org.uk), and in its publication *Design review*.

### 6.5

CABE strongly encourages pre-application discussions at the earliest possible opportunity, and will always seek to involve local authority planning departments at that stage. Local authorities are encouraged to draw this to the attention of the promoters of projects.

## Consultation with English Heritage

### 6.6

Many tall buildings will have an effect on the wider historic environment as well as local contexts. In every case, early pre-application consultation should be carried out with English Heritage staff in the appropriate regional office to ensure that all the implications are fully understood and explicitly portrayed in supporting illustrative material. Applicants should justify fully why these effects should be acceptable in the context of national, regional and local policies that relate to the management of change in the historic environment, and supplementary guidance by English Heritage. Details of English Heritage contacts are given on [www.english-heritage.org.uk](http://www.english-heritage.org.uk) and in the publication *Planning and development in the historic environment: a charter of English Heritage advisory services* (English Heritage 2005).

## Further reading

*Planning policy statement 1: delivering sustainable development*  
(Office of the Deputy Prime Minister, 2005)

All relevant national planning guidance can be found on [www.communities.gov.uk](http://www.communities.gov.uk)

*By design: urban design in the planning system: towards better practice*  
(Department for Environment, Transport and the Regions/CABE, Thomas Telford, 2000)

*Circular 01/06: guidance on changes to the development control system* (DCLG 2006)

*Design and access statements: how to write, read and use them* (CABE, 2006)

*Protecting design quality in planning* (CABE, 2003)

*Design review-ed: tall buildings*  
(CABE, due for publication 2007)

*Building in context*  
(CABE/English Heritage, 2002)

*Conservation bulletin issue 47: characterisation*  
(English Heritage 2005)

*Using historic landscape characterisation (HLC): English Heritage's review of HLC applications 2002/3* (English Heritage and Lancashire County Council 2004)

*Using urban characterisation*  
(English Heritage, due for publication 2007)

*Planning and development in the historic environment: a charter of English Heritage advisory services.*  
(English Heritage, 2005, to be updated 2007)

*Conservation principles, policies and guidance consultation* (English Heritage, February 2007)

The Historic Environment Local Management (HELM) website [www.helm.org.uk](http://www.helm.org.uk) provides accessible information for all those whose actions affect the historic environment.

This document sets out how CABE and English Heritage evaluate proposals for tall buildings. It also offers advice on good practice in relation to tall buildings in the planning process. Both organisations recommend that local planning authorities use it to inform local plan policy making and, if necessary, to evaluate planning applications for tall buildings where the appropriate policies are not yet in place. The government has supported the two organisations in producing this guidance. It should be treated as a material consideration in the determination of planning applications.

Commission for Architecture and the Built Environment

The government's advisor on architecture, urban design and public space

1 Kemble Street  
London WC2B 4AN  
T 020 7070 6700  
F 020 7070 6777  
E [enquiries@cabe.org.uk](mailto:enquiries@cabe.org.uk)  
[www.cabe.org.uk](http://www.cabe.org.uk)

English Heritage

The government's statutory advisor on the historic environment

1 Waterhouse Square  
138-142 Holborn  
London EC1N 2ST  
T 020 7973 3000  
F 020 7973 3001  
[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

If you would like to discuss this consultation document, please call Charles Wagner at English Heritage, telephone 020 7973 3826 email [tall.buildings@english-heritage.org.uk](mailto:tall.buildings@english-heritage.org.uk)



ENGLISH HERITAGE

