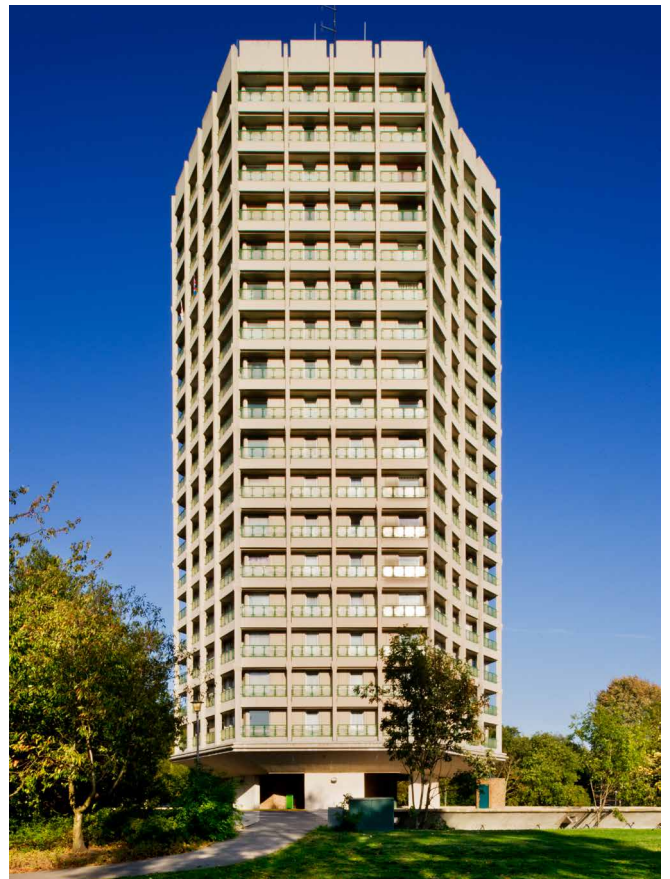
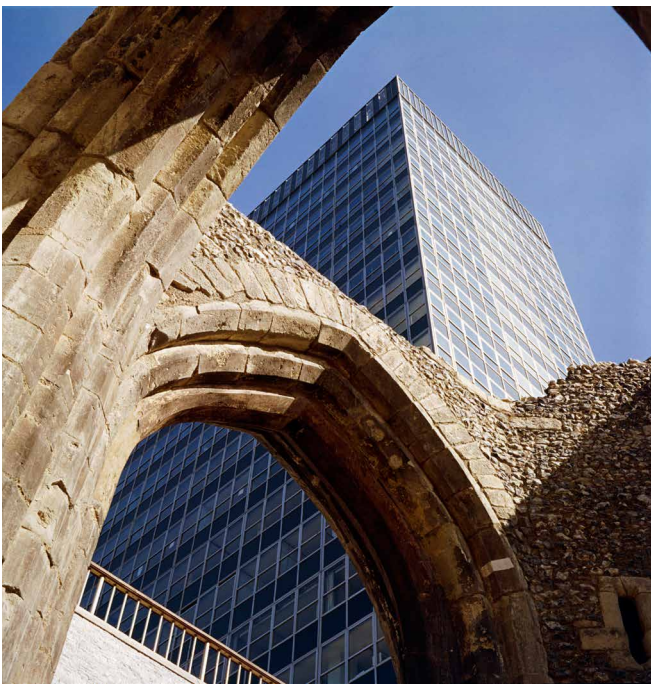




Historic England

Tall Buildings

Historic England Advice Note 4



Summary

This Historic England Advice Note updates previous guidance by English Heritage and [CABE](#), produced in 2007. It seeks to guide people involved in planning for and designing tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process. The advice is for all relevant developers, designers, local authorities and other interested parties.

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[HistoricEngland.org.uk/advice/planning](https://www.historicengland.org.uk/advice/planning)

Front cover

Top left: The ruins of St Alphage Church in the City of London with the then newly built (and now demolished) St Alphage House tower block in the background. Photographed by John Gay, c.1962.
Bottom left: Aerial view of Canary Wharf, London.

Top right: 20 Fenchurch Street, London ('Walkie Talkie') seen through Tower Bridge, London.
Right: The Grade II listed Point Royal tower block, Bracknell, Berkshire.

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Introduction

The purpose of this Historic England advice note is to support all those involved in dealing with proposals for tall buildings in implementing historic environment legislation, the relevant policies in the National Planning Policy Framework (NPPF), and the related guidance given in the Planning Practice Guidance (PPG). In addition to these documents, this advice should be read in conjunction with the relevant [Good Practice Advice in Planning and Historic England Advice Notes](#). Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives. The advice in this document may also be of use in the preparation of neighbourhood plans. This Advice Note supersedes the 'Guidance on Tall Buildings' which was produced by English Heritage and CABE in 2007, and reflects our practical experience of the impact of an increased number of completed tall buildings on the historic environment.

Historic England is the government's expert adviser on the historic environment. The planning process in England requires Historic England to be consulted on the development of local plans and in relation to certain proposals that affect the historic environment. We recognise the importance of managing change in the built environment to continually improve its quality. Our advice focuses on how the value of heritage assets may be affected, and how the heritage conservation objectives within legislation and national policy can best be achieved.

Historic England strongly encourages early and continued engagement in the preparation of local plans and in the development of particular tall building proposals. This reduces risks to developers and increases the likelihood of successful sustainable development.

1 Why Do We Give Advice on Tall Buildings?

1.1 Towns and cities evolve, as do their skylines. Individually, or in groups, tall buildings can significantly affect the image, character and identity of towns and cities as a whole, and over a long period. In the right place well-designed tall buildings can make a positive contribution to urban life. Past examples show us that they can be excellent works of architecture, and some of the best post-war examples of tall buildings are now listed.

1.2 However, if the building is not in the right place and well designed a tall building, by virtue of its size and widespread visibility, can also seriously harm the qualities that people value

about a place. What might be considered a tall building will vary according to the nature of the local area. A ten-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. One of the principal failings in the design of certain tall buildings was a lack of understanding of the nature of the area around them, and the impact they would have on both specific features of the historic environment and its general character. There have been many examples of tall buildings that have had a lasting adverse impact through being unsuitably located, poorly designed, inappropriately detailed and badly built and managed.

2 National Planning Policy

2.1 The government's objectives for new development are set out in the National Planning Policy Framework (NPPF), which states that the purpose of the planning system is to contribute to the achievement of sustainable development. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment as well as in the economic and social aspects of people's quality of life (paragraph 9). Furthermore the core planning principles state that planning should always, amongst other things, seek to: secure high quality design; take account of the different roles and character of different areas; and conserve heritage assets for this and future generations (paragraph 17).

2.2 The NPPF makes it clear that new development should be plan-led, with an emphasis upon the Local Plan having clear policies on what will or will not be permitted, in order to provide clarity for the determination of development proposals (paragraph 154). The

NPPF also makes it clear that the Government attaches 'great weight' to the conservation of designated heritage assets, including their settings (paragraph 132), and 'great importance' to the design of the built environment (paragraph 56). The design policies in paragraphs 56 to 68 make several references to the importance of good design responding to local character and history, and integrating new buildings into the historic environment. In addition, the NPPF confirms that the significance of heritage assets derives not only from a heritage asset's physical presence, but also from its setting (paragraph 132).

2.3 An up-to-date local plan based on a sound evidence base will contain enough detail to allow the significance of heritage assets to be assessed and to secure a commitment to high quality design (paragraphs 169-170). This will help local planning authorities to identify in local plans areas where tall buildings would not be appropriate because of their adverse impact (paragraph 157).

3 Tall Buildings and Local Plans

3.1 In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of the local plan. Techniques such as characterisation and building height studies provide evidence to support a local height definition for tall buildings and the identification of appropriate locations in local plans. This can be used to create clear core strategic policies, site allocations and development management policies, supported by supplementary planning advice where appropriate.

3.2 These location- or site-specific policies need to be drawn up through effective engagement with local communities, relevant parties such as Historic England, and with proper regard to national planning policies and heritage protection law. In addition, local planning authorities in London will need to take into account policies in the London Plan (2015 and its future alterations) – such as those relating to tall buildings, and the management of strategic views – and associated supplementary planning guidance (eg the *London View Management Framework, and Guidance on Setting of World Heritage Sites*).

3.3 The NPPF highlights the need for public bodies to consider the duty to cooperate in planning matters (paragraphs 178-181). Some tall buildings will raise planning issues beyond the boundaries of an individual authority that will require consultation and co-ordination with its neighbours. Opportunities should be sought to work together to produce joint planning policies and strategies where appropriate.

3.4 The advantages of including tall building policies in local plans include:

- a. Identifying the role and contribution of tall buildings, where appropriate, as part of an overall vision for a place
- b. Maintaining protection of the setting of any designated heritage assets and the overall historic character that makes a city or area distinctive and special
- c. Identifying areas appropriate for tall buildings in advance of specific proposals
- d. Demonstrating that in selecting areas for tall buildings due consideration has been given to the impacts on land outside the local authority's area
- e. The clear expression of spatial scale and design quality requirements for new tall buildings
- f. Encouraging an appropriate mix of uses that meets local needs
- g. Ensuring early public consultation on the principles of development in relation to place, context and design
- h. Reducing unnecessary, speculative applications in the wrong places, thereby avoiding wasting resources and hindering the delivery of appropriate developments
- i. Highlighting opportunities for the removal of past mistakes and their replacement by development of an improved quality and scale

- j. Setting out energy use targets and the requirements for a waste and water strategy
- k. Linking to the transport strategy for the area (the relationship to transport infrastructure, aviation constraints, the capacity of public transport, the quality of links between transport and the site, and the feasibility of making improvements, where appropriate, all need to be part of the wider consideration of tall buildings)
- l. Consideration of the impact on, and contribution to, local communities

3.5 As part of plan-making, the assembly of the evidence base provides the opportunity for a more thorough upfront heritage assessment and urban design analysis, which will be tested through the options appraisal, environmental impact assessment, consultation and, where relevant, the duty to cooperate (NPPF paragraphs 169-170). This will create a stronger and more realistic policy base, which is beneficial to the applicant and local authority alike in guiding site selection and design. A heritage assessment and urban design framework will help to identify the potential locations for tall buildings and can usefully be reflected in local plan policies and adopted as supplementary planning documents.

3.6 The NPPF seeks to secure high quality design as a core planning principle. To achieve this in plan-making for an area where tall buildings are to be encouraged, it is recommended that the potential impact of buildings of various heights and forms is modelled to assess their impact on surrounding heritage assets and the general historic character of the areas that may be affected (including areas beyond the local authority boundary).

3.7 A successful urban design framework will identify the various roles and characters of different areas, including their heritage interest, and thereby enable the conservation of heritage assets in a manner appropriate to their significance in accordance with the core planning principles in paragraph 17 of the NPPF. The design framework can:

- a. Identify 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 and character assessment (including the history of the place)
 - Materials
 - Landmark and historic buildings and areas and their settings, including backdrops, and important local views, prospects and panoramas
- b. Identify opportunities where tall buildings might enhance the overall townscape
- c. Identify sites where the removal of past mistakes might also achieve such an enhancement

3.8 The NPPF design policies stress that poor design ‘that fails to take the opportunities available for improving the character and quality of an area and the way it functions’ should be refused (paragraph 64). So, 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, as it may improve the area to replace it with a lower building. A rigorous process of analysis and justification will be needed in each case. Nor will an existing single tall building naturally justify further tall buildings so as to form a cluster. Each building will need to be considered on its merits, and its cumulative impact assessed. There may be good planning reasons to seek an increased development density in an area, but tall buildings represent only one possible model for delivering higher density development. Alternative forms may relate more successfully to the local context.

4 Making a Planning Application

4.1 Before making an application, it is good practice to discuss proposals with the local planning authority (LPA) and other relevant parties, such as Historic England (NPPF paragraphs 188-195). These consultations will help to:

- a. Identify the zones of visual influence of a proposal, which then help to understand the character of the areas that may be affected and determine which individual heritage assets are likely to be affected (this includes considering recognised views and the settings of heritage assets)
- b. Guide and improve design. Design Review is an established tool for the assessment of impact at the pre-planning and planning application stages, and can inform the Design and Access Statement. The greater the impact, the more detailed and comprehensive the Design and Access Statement needed. The same is true in relation to the heritage assessment
- c. Understand what illustrative material is likely to be needed in terms of the quality, accuracy, clarity and detail, so that the impact of a tall building can be properly and objectively assessed

4.2 Submitting a detailed planning application will require the applicant to provide sufficient information to enable the local planning authority to assess the impact and planning merits in taking a decision. Outline applications are only likely to be justified in exceptional cases where the impact on the character and distinctiveness of local areas and on heritage assets can be assessed without knowing the detailed form and finishes of the building. This is likely to be rare. If an outline application is sought in these circumstances it is important to ensure that the parameters for development are derived from a thorough urban design analysis that clearly demonstrates impact.

4.3 Applicants may find the checklist below useful when preparing an application. Further information is provided in the paragraphs which follow.

Checklist when preparing an application

- a. Design and Access Statement
- b. Heritage assessment
- c. Assessment of context (local and town- or city-wide)
- d. Assessment of cumulative impacts
- e. Environmental Impact Assessment
- f. Satisfaction of the following design criteria:
 - Architectural quality
 - Sustainable design and construction
 - Credibility of the design
 - Contribution to public space and facilities
 - Consideration of the impact on the local environment (and particularly at ground level)
 - Provision of a well-designed inclusive environment

4.4 A Design and Access Statement should accompany all tall buildings proposals. The principles established within the Design and Access Statement will need to satisfactorily demonstrate high quality in urban design and architecture, as well as respond to and take full account of the evaluation of heritage assets.

4.5 A high quality scheme will have a positive relationship with:

- a. Topography
- b. Character of place
- c. Heritage assets and their settings
- d. Height and scale of development (immediate, intermediate and town- or city-wide)
- e. Urban grain and streetscape
- f. Open spaces
- g. Rivers and waterways
- h. Important views including prospects and panoramas
- i. The impact on the skyline

4.6 Careful assessment of any cumulative impacts in relation to other existing tall buildings and concurrent proposals will also be needed to fully understand the merits of the proposal. The existence of a built or permitted tall building does not of itself justify a cluster or additions to a cluster. Where a proposal is promoted as part of a cluster, a successful design will have a positive relationship within the cluster; the altered impact of a cluster itself needs to be considered. The use of modelling and visual aids is recommended to fully assess a proposal's impact on the surrounding area.

4.7 Planning applications for tall buildings are likely to require an environmental impact assessment (EIA), which would be expected to address matters in respect of both the proposed building and its cumulative impact, including:

- a. Accurate and realistic representations of the proposal
- b. Consideration of the character of surrounding areas and the settings of heritage assets
- c. Consideration of impact on significant views
- d. Consideration of impact on townscape and public realm
- e. Other relevant environmental issues, particularly sustainability and environmental performance, eg the street level wind environment

4.8 A successful application will have fully addressed a range of design criteria. Delivering architectural quality involves a consideration, amongst other things, of the building's:

- a. Scale
- b. Form and massing
- c. Proportion and silhouette
- d. Facing materials
- e. Detailed surface design
- f. Relationship to other structures
- g. Impact on streetscape and near views
- h. Impact on cityscape and distant views
- i. Impact on the skyline

4.9 Tall buildings need to set exemplary standards in design because of their scale, mass, wide impact and likely longevity. Good design will take the opportunities available for improving the character and quality of an area and respond to local character and history (NPPF paragraphs 58 and 64). It is important that the required high standard of architectural quality is maintained throughout the process of procurement, detailed design, and construction, through the use of conditions and reserved matters.

4.10 Given their likely impact on a wide area, it is important that social and environmental effects are also assessed. Consideration needs to be given to a tall building's contribution to public space and facilities. This applies both internally and externally, including the provision of a mix of uses (especially on the ground floor of towers), as part of a well-designed public realm. Consideration of the impact on the local environment is also important, including microclimate, overshadowing, night-time appearance, light pollution, vehicle movements, the environment and amenity of those in the vicinity of the building, and the impact on the pedestrian experience. Well-designed tall buildings provide an inclusive environment, both internally and externally, taking opportunities to offer improved permeability, accessibility and, where appropriate, the opening up or effective closure of views to improve the legibility of the wider townscape.

5 Assessing Proposals

5.1 Many of the issues associated with determining an application for a tall building proposal are the same as for other applications with heritage implications and should therefore be **approached in the same way**. The advice on policy, process and material considerations set out in sections 2 and 4 is also of relevance to local planning authorities in their consideration of applications. Some aspects of tall buildings proposals raise particular issues, however, and these are discussed below.

5.2 Where relevant, the LPA will need to consider the impact on world heritage sites. The statement of significance and the management plan prepared for each World Heritage Site (which may include a buffer zone to help protect its setting) are material considerations in the planning process.

5.3 It is important that the planning authority is satisfied that the applicant has checked with the Civil Aviation Authority whether flight paths to airports and heliports are affected, and if this has then been evaluated and mitigated.

5.4 Where full planning permission for a tall building is to be sought, suitable planning conditions and obligations can be used for the detailed design, materials and finishes, and treatment of the public realm, as well as for achieving proportionate public and community benefits.

5.5 When considering any proposal that has an adverse impact on a designated heritage asset through development within its setting, ‘great weight should be given to the asset’s conservation’, with any harm requiring a ‘clear and convincing justification’ (NPPF paragraph 132). In assessing this justification, and in weighing any public benefits offered by a tall building proposal, local planning authorities will need to pay particular regard to the policies in paragraphs 8 and 9 of the NPPF that state that economic, social and environmental gains are to be sought jointly and simultaneously in order to deliver positive improvements in the quality of the built, natural and historic environment. This may involve the examination of alternative designs or schemes that might be more sustainable because they can deliver public benefits alongside positive improvement in the local environment. If a tall building is harmful to the historic environment, then without a careful examination of the worth of any public benefits that the proposed tall building is said to deliver and of the alternative means of delivering them, the planning authority is unlikely to be able to find a clear and convincing justification for the cumulative harm.

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