

I INTRODUCTION

1.1

In June 2001, English Heritage and the Commission for Architecture and the Built Environment (CABE) published a consultation document *Guidance on Tall Buildings*. Responses were received from a wide range of organisations and interests. The majority (64%) supported the guidance.

1.2

In November 2002 the Government responded to a Report of the Parliamentary Committee on Transport, Local Government and Regional Affairs on tall buildings. It resolved that as a substantial body of policy and advice already existed in relation to the design and location of new development, it did not consider that a separate policy on tall buildings was required. In updating *PPG1*, it will underline the importance of securing well-designed, safe and sustainable developments that show respect for their surroundings and context.

1.3

The Government also encouraged English Heritage and CABE to finalise their draft *Guidance on Tall Buildings* taking full account of the Committee's recommendations and the Government's response. It stated that this jointly developed good practice note would be capable of being a material consideration in the determination of planning proposals and would be of value to local planning authorities in drawing up their planning policies.

1.4

This guidance document is the result of the above process. Its purpose is to provide advice and guidance on good practice in relation to tall buildings in the planning process and to highlight other related issues which need to be taken into account. It sets out how CABE and English Heritage will evaluate proposals for tall buildings. CABE and English Heritage recommend that local authorities should use it as a basis for their own consideration of such projects and as a starting point when preparing local policies.

2 PLANNING POLICY

2.1

Tall buildings have to take into account many components of national and regional planning policy guidance as well as local policies. *PPG1: General policy and principles* and *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. Use-specific policies, such as *PPG3: Housing*, will apply in some cases, and, as many schemes will contain a mix of uses, as encouraged by *PPG1*, more than one of these planning policy guidance notes may be relevant. Regional planning guidance will also need to be taken properly into account; in London, *LPAC's Strategic Planning Advice on High Buildings and Strategic Views in London*, endorsed by the Government in November 1999, will be particularly important, until it is superseded by the Mayor's *London Plan*. The increasing recognition of the importance of design quality as a consideration within the planning system, referred to above, is set out in *PPG1* and the DETR/CABE publication *By Design*.

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 guidance. 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 tall buildings should be of the highest architectural quality and designed in full cognisance of their likely impact on their immediate surroundings and the wider environment.

The Government has encouraged 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 should carry this out as part of their plan-making functions. Where there is a possibility of such proposals, the locations where tall buildings are, or are not, appropriate should be identified in local authority development plans or, in future, when preparing development plan documents. These should be drawn up through effective engagement with local communities and with proper regard to Government 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 within the local development plan or framework;
- 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

In identifying locations where tall buildings would and would not be appropriate, local authorities should, as a matter of good practice, carry out a detailed urban design study. This should take into account historic context through a character appraisal. It should identify those elements that create local character and other important features and constraints, including streetscape, scale, height, urban grain, natural topography, significant views of skylines, landmark buildings and areas and their settings, including backdrops, and important local views, prospects and panoramas. Opportunities where tall buildings might enhance the overall townscape, or where the removal of past mistakes might achieve a similar outcome, should be highlighted.

2.7

Having identified the constraints and opportunities through an urban design study, specific policies should be included in local development plans (or, in future, development plan documents) clearly identifying, in map-based form, areas which are appropriate, sensitive or inappropriate for tall buildings. In some historic towns and areas, 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 as supplementary planning guidance in support of the policies in the plan. 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 placemaking process.

3 PLANNING APPLICATIONS

3.1

PPG1 sets out the requirement for proposals to be accompanied by a design statement, where appropriate. *By Design* provides good

practice guidance. 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 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, including a full character appraisal. *By Design* contains useful advice on the objectives of urban design and other considerations which should inform such a study. Where there are concurrent proposals for other tall buildings, or where others are likely to follow, the implications of these should be addressed by the study.

3.2

Developments in presentation techniques and technology have made it easier to present realistic photomontage views of new building proposals. Some planning applications have set very high standards of illustration using animations as well as still images. Future applications should match or improve upon this standard. All proposals for tall buildings should be accompanied by accurate and realistic representations of the appearance of the building 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. Often it may be helpful to include relative height studies, to see what a scheme would look like in context at varying heights.

3.3

Without representational material of this scope, quality, clarity and detail, it is not possible to carry out a proper assessment of the architectural quality of a tall building or of its effect on the immediate and wider context.

3.4

Proposals for significant tall buildings are likely to require a full Environmental Impact Assessment.

4 EVALUATING TALL BUILDING PROPOSALS

4.1

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.

4.2

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 which 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 necessarily 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.

4.3

Many of the arguments used to support proposals for new tall buildings, including design quality, were also put forward in favour of examples which are now regretted. That is why projects which

come forward now should be subject to the very closest scrutiny, and the very highest standards should be applied.

4.4

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.

4.5

The trend of recent and emerging policy, based on sustainability and demographic considerations, has been 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 are 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 term 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.

CRITERIA FOR EVALUATION

4.6

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 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. 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:

i) 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.

ii) The effect on the whole existing environment, including the need to ensure that the proposal will conserve, or not damage or detract from:

- World Heritage sites and their settings, including buffer zones
- Scheduled Ancient Monuments and their settings
- Listed buildings and their settings, including the foregrounds and backdrops to landmark buildings
- Conservation Areas and their settings
- Archaeology
- Historic parks and gardens, landscapes and their settings
- Other open spaces, including rivers and waterways, their settings and views from them
- Other important views, prospects and panoramas.

(iii) 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.

iv) 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.

v) The contribution that the development will make to external and internal public spaces and facilities 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 diversity, vitality, social engagement and 'sense of place'.

vi) 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.

vii) The contribution made to the permeability of a site and the wider area; opportunities to offer improved linkages on foot, and, where appropriate, the opening up, or effective closure, of views to improve the legibility of the city and the wider townscape.

viii) In so far as relevant to the planning decisions, function and fitness for purpose: the provision of a high-quality environment for those who use the buildings.

ix) The sustainability of the proposal: any tall building proposal must be sustainable in the broadest sense, taking into account its physical, social, economic and environmental impact based on whole life costs and benefits.

4.7

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 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.

4.8

Major building projects offer opportunities to enrich the public realm in terms of external and internal space. In many cases 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.

4.9

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 setting. It should produce more benefits than costs to the lives of those affected by it.

5 PROTECTION OF DESIGN QUALITY

5.1

Proposals for tall buildings should not be supported unless it can be demonstrated through the submission of fully worked-up proposals that they are of the highest architectural quality. For this reason neither CABE nor English Heritage consider that outline planning applications would be appropriate.

5.2

Where 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

As the national bodies charged, respectively, with promoting high standards in architecture and urban design and with the conservation and enhancement of the historic environment in England, both CABE and English Heritage have an important role to play in evaluating tall building proposals, which, by definition, are usually of more than local significance.

CONSULTATION WITH CABE

6.2

The letter from the Department of the Environment, Transport and the Regions (DETR) to planning authorities, of 15 May 2001 sets 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 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 and in its publication *Design review*.

6.3

CABE strongly encourages pre-application discussions at the earliest possible opportunity, and encourages local authorities to draw this to the attention of the promoters of projects.

CONSULTATION WITH ENGLISH HERITAGE

6.4

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 respective regional office to ensure that all the implications are fully understood and explicitly portrayed in supporting illustrative material. Applicants should justify fully how they believe these effects should be acceptable in the context of national, regional and local policies, and how they produce more benefits than costs to those who are affected.

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