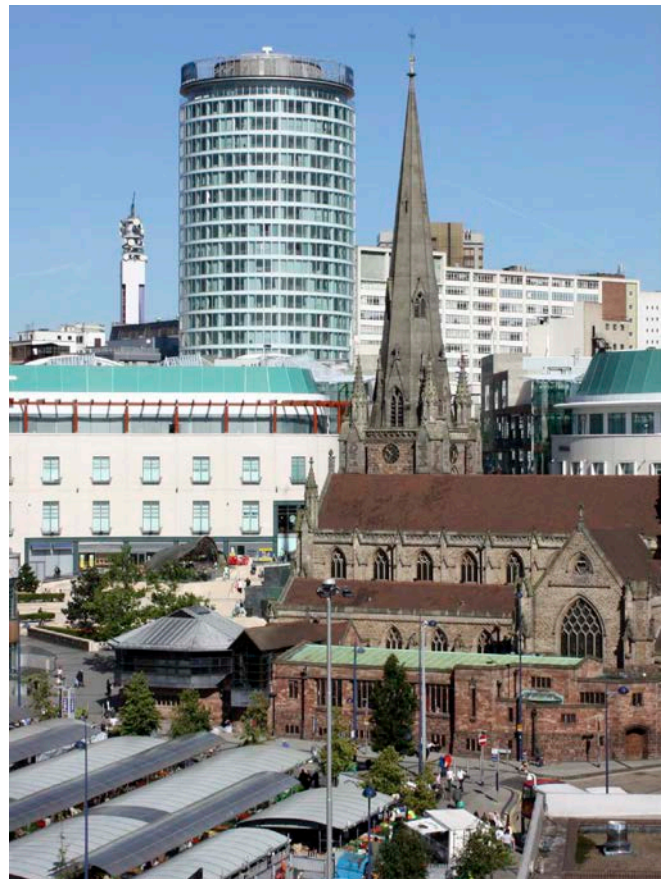




Historic England

Tall Buildings

Historic England Advice Note 4





Summary

This revised Historic England Advice Note (HEAN 4) provides advice on planning for tall buildings within the historic environment.

Its purpose is to support local planning authorities (LPAs), developers, communities and other stakeholders in dealing with tall buildings proposals within the legislative and planning framework relevant to the historic environment. It focuses on:

- Plan-making and the importance of a plan-led approach to tall building development;
- The information needed to support plan-making, and to assess and determine individual development proposals at application stage; and
- How to identify appropriate locations for tall buildings and define design parameters in relation to the historic environment.

Case studies from across England are included to provide insights and experience.

This edition updates Historic England’s advice in light of changes to national planning policy and guidance, and recent experience of planning for tall buildings in the historic environment. It also reflects research from ‘Assessing the Impact of Tall Buildings on the Historic Environment’ report (Node, 2021). This Historic England Advice note supersedes ‘Historic England Advice Note 4: Tall Buildings, first edition (2015)’.

Front cover

Left: Beetham Tower and Castlefield Congregational Chapel, Manchester.

Top right: Nottingham city centre viewed from the north east.

Bottom right: St. Martin's and The Rotunda, Birmingham.

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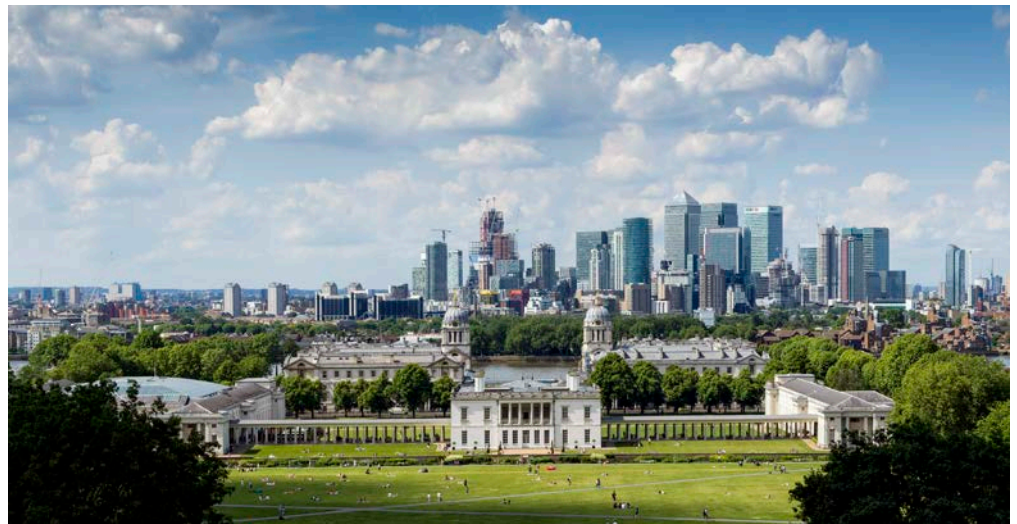
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1

Introduction

1.1 This Historic England Advice Note provides advice on planning for tall buildings within the historic environment. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.

Figure 1: View of Greenwich and Canary Wharf, London.
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1.2 This advice note is intended to support the implementation of relevant legislation, national planning policy and guidance. It aims to:

- Set out a proportionate approach to planning for tall buildings, with practical advice;
- Assist local planning authorities (LPAs), developers, planning consultants and other interested parties; and
- Support the application of Historic England's '[Good Practice Advice Note 3: The Setting of Heritage Assets](#)' on setting and views¹.

It should be read in conjunction with the relevant Historic England [Good Practice Advice in Planning and Historic England Advice Notes](#).

1 Historic England's Good Practice Advice Note 3: The Setting of Heritage Assets (GPA3) provides further details on understanding setting (including views) and how it contributes to the significance of heritage assets; and managing change within the setting of heritage assets.

Principles

1.3 When planning for tall buildings it is important to avoid or minimise impacts upon the significance of heritage assets. There are some principles to consider that will help do this:

- A plan-led approach to tall buildings to determine their location;
- An evidence base which explores alternative options for the location and heights of tall buildings²;
- Decision making informed by understanding of place, character and historic significance;
- Tall buildings proposals which take account of local context and historic character; and
- Early and effective engagement at plan-making and decision-taking stages including the use of design review panels.

2 See NPPF paragraph 35.

2

Policy and guidance background

2.1 Primary legislation, the ‘National Planning Policy Framework’ (NPPF), and the government’s ‘Planning Practice Guidance’ (PPG) set the backdrop against which new development is managed in relation to the historic environment. In addition, tall buildings are specifically addressed in the government’s ‘National Design Guide’(NDG)³, and ‘National Model Design Code’ (NMDC)⁴ including ‘Guidance Notes for Design Codes’⁵. This legislative and policy framework is implemented through the plan-making and the development management processes.

Plan-making

2.2 Development plans and planning decisions need to promote sustainable development. The NPPF (paragraph 8) defines the protection and enhancement of the historic environment as a key aspect of sustainable development’s environmental objectives. Therefore, tall building proposals that take account of the historic environment and are designed to avoid or effectively mitigate harm to it, would constitute sustainable development in heritage terms. The NPPF goes on to emphasise the importance of a plan-led approach (paragraph 15) which can be used to direct the location and development parameters of tall building development and help deliver sustainable development.

-
- 3 The National Design Guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. See: <https://www.gov.uk/government/publications/national-design-guide>.
 - 4 The National Model Design Code provides detailed guidance on the production of design codes, guides and policies to promote successful design. See: <https://www.gov.uk/government/publications/national-model-design-code>.
 - 5 Guidance Notes for Design Codes sets out possible contents for a design code, modelled on the ten characteristics of well-designed places set out in the National Design Guide. See: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957207/Guidance_notes_for_Design_Codes.pdf.

2.3 Tall building development by its nature can have transformational impacts upon a place. This can be achieved without harm to heritage primarily by focusing on sustainable locations and avoiding or effectively mitigating impact on the significance of heritage assets. The NPPF sets a clear direction on these matters:

- ‘Significant adverse impacts’ on sustainable development should be avoided and alternative options pursued (NPPF, paragraph 32);
- Heritage assets are ‘an irreplaceable resource’ (NPPF, paragraph 189);
- ‘Great weight’ should be given to the conservation of heritage assets, with assets of higher importance given greater weight (NPPF, paragraph 199); and
- When considering the impact of a proposal any conflict between a heritage asset’s conservation and any aspect of the proposal should be avoided or minimised (NPPF paragraph 195).

2.4 The development of tall buildings can have positive impacts upon an area, particularly if they are part of a wider regeneration scheme. Equally, there will be sites where the impacts upon the historic environment cannot be overcome or minimised. Such sites may be inherently unsuitable for tall buildings due to the harm they would cause to the significance of heritage assets.

2.5 Setting clear development parameters can mitigate risk of harm to the historic environment as follows:

- **Location:** The NMDC states design codes should make provision for taller buildings by either indicating zones where tall buildings can be considered, or circumstances where exceptions to the height coding may be considered (see Built Form 52 ix and ‘Guidance Notes for Design Codes’ paragraph 116). ‘Guidance Notes for Design Codes’ advises that development plan policies on tall buildings take account of ‘Tall Building Principles’ including heritage assets, local historic character and conservation areas (paragraph 117). In addition, detailed assessment is needed when allocating sites in plans and deciding individual planning applications.
- **Heights:** ‘Guidance Notes for Design Codes’ sets out guidance to assist in the definition of tall buildings. It refers to characterisation studies and design strategies dealing with urban form, historic character, and local context to inform height parameters (paragraph 117). It is important to clarify that these are parameters that development should be designed within, and not a starting point for buildings heights to exceed. Where variations in height are needed within those parameters, for townscape and topography purposes and to add variety to skylines, policies should specify this.

Development management

2.6 Planning applications need to be supported by enough information so that the impacts of the development upon the historic environment can be properly understood (NPPF paragraphs 43 and 194) and dealt with speedily. Relevant supporting information describes the significance of heritage assets, the impact of proposals on significance, and intended sustainable development outcomes. Applicants can seek pre-application advice to help them understand and agree the sorts of supporting information that might be needed in advance of submitting their application.

2.7 Good design can ensure that tall buildings respond positively to the character of the surrounding area and the historic environment and can be used creatively to achieve sustainable outcomes. The NPPF gives ‘significant weight’ to design for proposals which promote high levels of sustainability or raise the standard of design more generally in an area ‘so long as they fit with the overall form and layout of their surroundings’ (NPPF, paragraph 134).

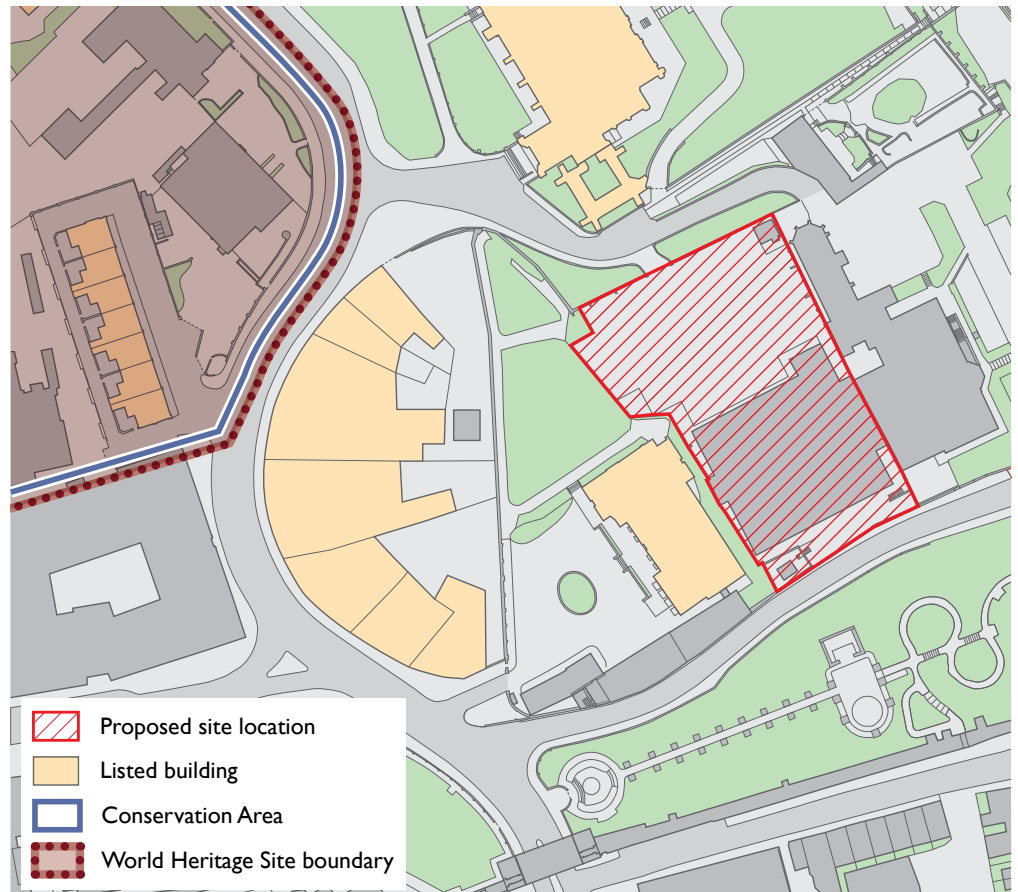
2.8 The importance of good design is reinforced through the NDG which promotes the creation of high-quality buildings and places. It sets out ten characteristics of good design including understanding and responding to context (paragraph 43), and valuing heritage, local history and culture (paragraph 46). It also provides guidance on tall buildings, emphasising the importance of design (paragraph 70), location, siting, context, local character and views (paragraph 71).

3

Tall buildings and their impacts

3.1 In the right locations tall buildings can support major change or regeneration while positively influencing place-shaping and conserving the historic environment. Special qualities such as design or use of new technologies have been recognised, with several tall buildings (including post-war examples such as the BT Communications Tower and Lloyd's building in London, and the Alpha Tower in Birmingham) now listed. In the right place well-designed tall buildings can make a positive contribution.

Figure 2: Map showing a potential tall building site in relation to surrounding heritage assets.
© Historic England.



3.2 If a tall building is not in the right place, by virtue of its size and widespread visibility, it can seriously harm the qualities that people value about a place. There will be locations where the existing qualities of place are so distinctive and the level of significance of heritage assets so great that tall buildings will be too harmful, regardless of the perceived quality of the proposal's design and architecture.

Case Study 1: 'York Central Historic Core Conservation Area Appraisal' (2014)

In the city of York, most buildings in the historic core are no more than four storeys high. The historic skyline is dominated by structures representing the Church and the State, in the form of the towers and spires of the parish churches and Minster, and the outline of the Castle. The city's views in and out are fundamental to its special character.

There are several isolated 20th century office and hotel buildings, of more than five storeys high, which impact the conservation area as they are out of scale with their surroundings. However, the demolition of the sugar beet factory removed the principal challenger to the Minster's pre-eminent position, safeguarding it as the 'defining and ancient image of the city' (page 100).

Figure 3: The York skyline seen from Clifford's Tower.
© Historic England.



In response to new tall buildings, guidance on new development and design in section 5.8 of the 'Conservation Area Appraisal' states 'there should be a presumption against buildings of more than 4 storeys high in the Conservation Area' (page 481), whilst identifying specific exceptions. The appraisal includes guidance relating to building heights and design, taking account of key views, skyline and local character. Policy D1 in the 'Publication Draft Local Plan 2018' reinforces this guidance, directing development to take account of York's special qualities and not challenge the visual dominance of the Minster or city centre roofscape.

3.3 The following factors need to be considered to determine the impacts a tall building could have upon the historic environment:

- **Quality of places:** the distinctive qualities and values of a place including historic character and context;
- **Heritage:** understanding the significance of the historic environment and the potential impact on this significance;
- **Visual:** the impact on the streetscape, town or cityscape and wider urban and rural landscapes, and views. This includes the setting of heritage assets;
- **Functional:** the design, embodied carbon and carbon cost, construction and operation;
- **Environmental:** the influence on local micro-climates such as creation of wind tunnels, canyon effect, over-shadowing, glare, and air quality and effect on heritage assets in terms of the impact these micro-climatic changes could have upon their fabric, and how they are experienced; and
- **Cumulative:** the combined impacts on heritage assets from existing, consented and proposed tall buildings.

Defining tall buildings

3.4 Tall buildings vary significantly in their impact depending on their height, mass and location. What might be considered a tall building will vary according to the nature of the local area. A five-storey building in a mainly two-storey neighbourhood could be considered tall, whereas in the centre of a large city it may not. By their nature tall buildings can have wide-ranging impacts on the historic environment.



Figure 4: Example of an isolated tall building surrounded by low-rise buildings.
© Historic England.

3.5 Definitions of tall buildings can vary, but in general they should be informed by local character. Other methods of definition may be appropriate depending on local circumstances. For instance, the ‘Guidance Notes for Design Codes’ defines a tall building as a structure that exceeds the general height guidance for a particular area type (paragraph 117). Whereas the ‘London Plan’ (2021)⁶ – which is a good example of a plan that sets out a clear strategy for the development of tall buildings – requires local authorities to define what is tall, based on evidence of the local context, and, for those situations where such a definition is absent, there is a minimum height threshold for the policy to be applied (Policy D9⁷).

6 The statutory spatial development strategy for the Greater London area.

7 The London Plan minimum definition of a tall building came from a Written Ministerial Direction dated 10 December 2020.

Case Study 2: 'London Plan 2021'

Policy D9 of the London Plan defines tall buildings as follows:

'Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.'

Policy D9 provides a clear direction that tall buildings are located in areas that individual boroughs determine may be appropriate for tall buildings, subject to meeting the other requirements of the Plan.

The policy has a locational and criteria-based approach. The locational policy (Part B) is supported by procedural points on how tall building locations are to be identified. The procedural guidance sets out steps to sieve sites suitable for tall buildings, determine the heights of tall buildings in those locations and specify the locations and heights on maps in development plans.

Criteria-based aspects of the policy (Part C) provide a steer to LPA development management teams when determining tall building applications, guiding development proposals to address and respond to impacts relating to visual, functional, environmental and cumulative impacts.

Using locational and criteria-based policies helps direct tall buildings to locations defined as suitable in the development plan, with a consistent set of criteria-based tests for tall building proposals which engage with heritage considerations.

3.6 The London Plan's approach is a helpful example of a character and context-based definition that can also be applied by LPAs outside London. Defining tall buildings in this way aligns with Historic England's '[Good Practice Advice in Planning Note 3: The Setting of Heritage Assets](#)' which advises that 'An assessment of local character, which contributes to local context, helps to identify potential impacts in respect of proposed height, mass and location of tall buildings' (paragraph 7).

4

Tall buildings and the development plan

4.1 A plan-led approach for tall buildings within the historic environment includes preparation of a proportionate evidence base, consultation, design, location, and policy development. The following checklist summarises the main considerations for tall building policies, taking account of the historic environment.

Checklist 1: Development plan tall building policy checklist

1. Development plans should include:
 - a. A specific tall buildings policy accompanied by site-specific policies to support areas / sites identified as appropriate for tall buildings; or, where tall buildings proposals are the exception
 - b. A more general place-shaping policy, which includes building height, density and local context.
3. The tall building policy should:
 - a. Be underpinned by proportionate evidence to direct tall buildings to suitable locations where they make a positive contribution to the urban or rural landscape and ensure potential harm to the significance of heritage assets is avoided or minimised (see [Appendix 1](#)).
 - b. Be informed by a heritage impact assessment, views analysis, and existing conservation area appraisals.
 - c. Identify the potential impact of a tall building's height, mass and location through assessment of local context, historic character, the significance of heritage assets, and protected views which contribute to setting.
 - d. Ensure the protection of heritage assets, and conservation of the overall historic character that makes a place distinctive and special, avoiding or minimising harm to their significance.

- e. Form part of the development plan's positive strategy for the:
 - Conservation and enjoyment of the historic environment (NPPF, paragraph 190).
 - Areas prevailing character and setting (NPPF, paragraph 124).
 - Contribution to views and skyline (NDG, paragraph 70);
 - f. Form part of a coherent plan-led place-shaping strategy, contributing towards well-designed places sympathetic to local character and history, including the surrounding built environment and landscape setting (NPPF, paragraph 130).
 - g. Be informed by early and ongoing engagement with stakeholders and communities.
 - h. Specify tall building height parameters.
 - i. Make it clear that the existence of a tall building coming to the end of its lifespan does not automatically justify it being replaced by another tall building
 - j. Address the following:
 - Location and siting;
 - Relationship to context;
 - Impact on local character, views and sight lines;
 - Composition – how tall buildings meet the ground and sky;
 - Environmental impacts, such as sunlight, daylight, overshadowing and wind; and
 - The appropriateness, or otherwise, of clustering tall buildings and how design quality and pressure for expansion in these areas are dealt with.
3. In relation to proposed tall buildings affecting a listed building or conservation area, the LPA needs to comply with Section 66 (1) and Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Tall building-specific consultation issues

4.2 The proposed location of tall buildings may raise planning and conservation issues beyond the boundaries of an individual authority. As a minimum consultation should be carried out with neighbouring authorities in line with the NPPF (paragraph 35). There is also the opportunity to prepare joint evidence bases and jointly commission tall buildings evidence, working towards a collaborative policy position.

A proportionate evidence base

4.3 Assessment of the historic environment is an important part of the evidence base needed to underpin development plan policies. The more heritage sensitivities there are, the more detailed the evidence will need to be in order to produce robust policies and to provide clear expectations. In some cases, evidence can be produced for groups of sites in the same area and with similar issues to reduce the number of specific documents needed. Early engagement with statutory consultees can help determine the sorts of evidence that will be needed. [Appendix 1](#) lists the evidence that may be needed to inform development plan policies.

Design framework

4.4 Tall building policies can be informed by a design framework (including policies, Supplementary Planning Documents, and codes) which responds to evidence gathered for the development plan. Design frameworks should consider:

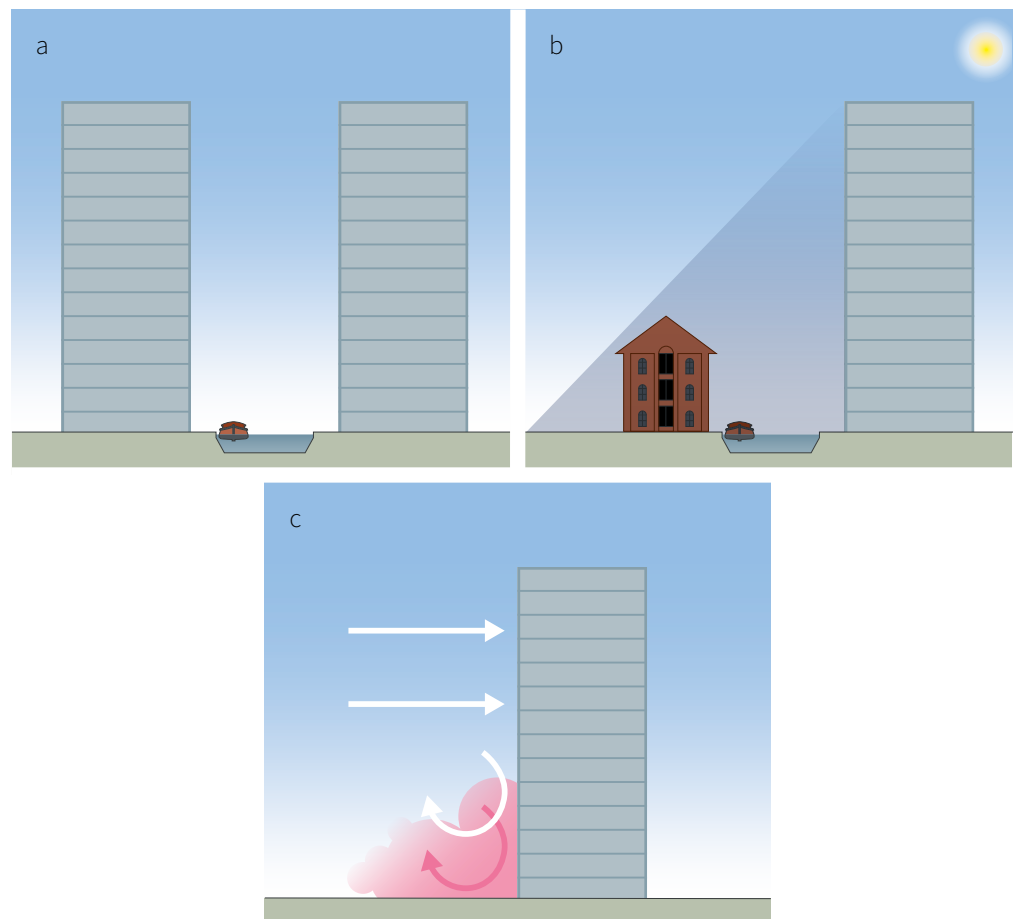
- Those elements that create local character⁸;
- Important features such as views, skylines, streetscape, building scale and materials, landmark buildings, and heritage assets;
- Opportunities where prominent or tall buildings may be appropriate and enhance overall townscape legibility; and
- Sites where the removal of harmful tall buildings could enhance the historic environment (see [Case Study 1](#)).

8 Historic England's Characterisation Thesauri including the recently published London Characterisation Thesaurus provides useful guidance on characterisation of the urban historic environment.

4.5 Using an understanding of the historic environment to inform the approach to tall building design can be achieved by:

1. **The response to local context:** understanding local context (including its evolution) is critical to achieving good design. This includes considering how the tall building relates to neighbouring buildings. It is important that the massing and scale of the building is appropriate in relation to its surroundings and responds to context to avoid or minimise harm to the significance of heritage assets. It is helpful to consider the relationship between the top, middle, and bottom sections of a tall building with their surroundings and the potential impact on streetscape, town/cityscape and skyline. Where tall buildings are proposed in regeneration areas, there may be opportunities to improve local character through design.
2. **The impact on the local environment:** people's experience of local character and the historic environment can be affected by factors such as wind and other microclimatic changes, overshadowing, and light pollution from the development of a tall building. In some cases, this has the potential to impact the physical fabric of heritage assets. It is important to test impacts on the local environment at design stage and present these through the application process to reduce the incidence of interventions being required to mitigate impacts post construction (which may in turn harm character and quality of a site, street or area).

Figure 5: Tall building micro-climate diagram
a: Example of tall buildings creating a canyoning effect.
b: Example of overshadowing.
c: Example of wind tunnelling effect at ground level from a tall building.
© Historic England.



3. **Architectural quality:** consideration can be given to whether a distinctive landmark design or a restrained architectural response is more appropriate in terms of the likely impact on the historic environment. High-quality architecture involves designing a tall building ‘in the round’ so it is coherent from all directions taking account of a building’s scale, form, massing, proportions, silhouette, façade materials and detailed surface design. It is important to note that not all tall buildings can be landmarks, and not all landmarks need to be tall buildings.
4. **Functional design:** façade treatment and finishes, external lighting, placement of plant, servicing and use of advertising screens are all important considerations in locations where locally distinct features are vulnerable to change in local context and character. The functional design of new buildings needs to consider and respond carefully to the historic environment. Historic environments often demonstrate strong street-based urban design qualities. Tall buildings often need to balance a range of needs, including greater servicing demands for ground floors. However, the design of tall buildings should reflect or reference local street-based qualities, such as active frontages and human scaled design at street level.
5. **Sustainable design and construction:** opportunities to enhance the appearance of an area and reduce harm to the historic environment through the re-development or retrofit of a tall building can be explored. Considerations may include different massing options; improvements to the base of the building and public realm; using durable high-quality materials; and whole life carbon costs.
6. **A well-designed inclusive environment:** the way tall buildings are experienced at ground level is an important consideration as tall buildings can have a significant impact on the historic streetscape and public realm. In some cases, redevelopments may create opportunities to enhance elements of the significance of heritage assets by opening lost views or revealing historic street patterns.

Three-dimensional modelling

4.6 Designing and planning for tall buildings can be enhanced by, and in some cases may require, the use of three-dimensional digital modelling. Such models support the development of options analysis evidence for tall building policies as they allow:

- Spatial assessment incorporating heritage designations;
- The ability to test multiple scenarios and urban design approaches;
- Analysis of views; and
- Consideration of other environmental factors such as wind, daylight/sunlight and pollution.

4.7 Three-dimensional digital models are helpful sources of evidence to support site allocation policies, and they can be used to support digital plan-making. They can also be an effective visual way to communicate proposals to all audiences, especially communities, making plan-making more inclusive.

Understanding impacts on views

4.8 There is a distinction between setting and views⁹:

- **Setting** is more comprehensive and can include contextual elements which deal with the relationship of an asset to its surroundings both in the present and in the past. This includes the way a heritage asset or place is experienced and perceived today.
- **Views** are a more defined element of setting, and not every heritage asset will have significant views associated with it. Nonetheless, views can make a vital contribution to the setting of heritage assets and constitute part of an asset's significance, for example Liverpool's Cathedrals, Oxford's 'dreaming spires' or London's protected views of St Paul's Cathedral, the Palace of Westminster and the Tower of London.

Townscape and landscape can be enlivened by views which are integral to how the historic environment is experienced and draws visitors, so it is important to understand the significance they have.

9 See Historic England's [Good Practice in Planning Advice Note 3: The Setting of Heritage Assets](#).

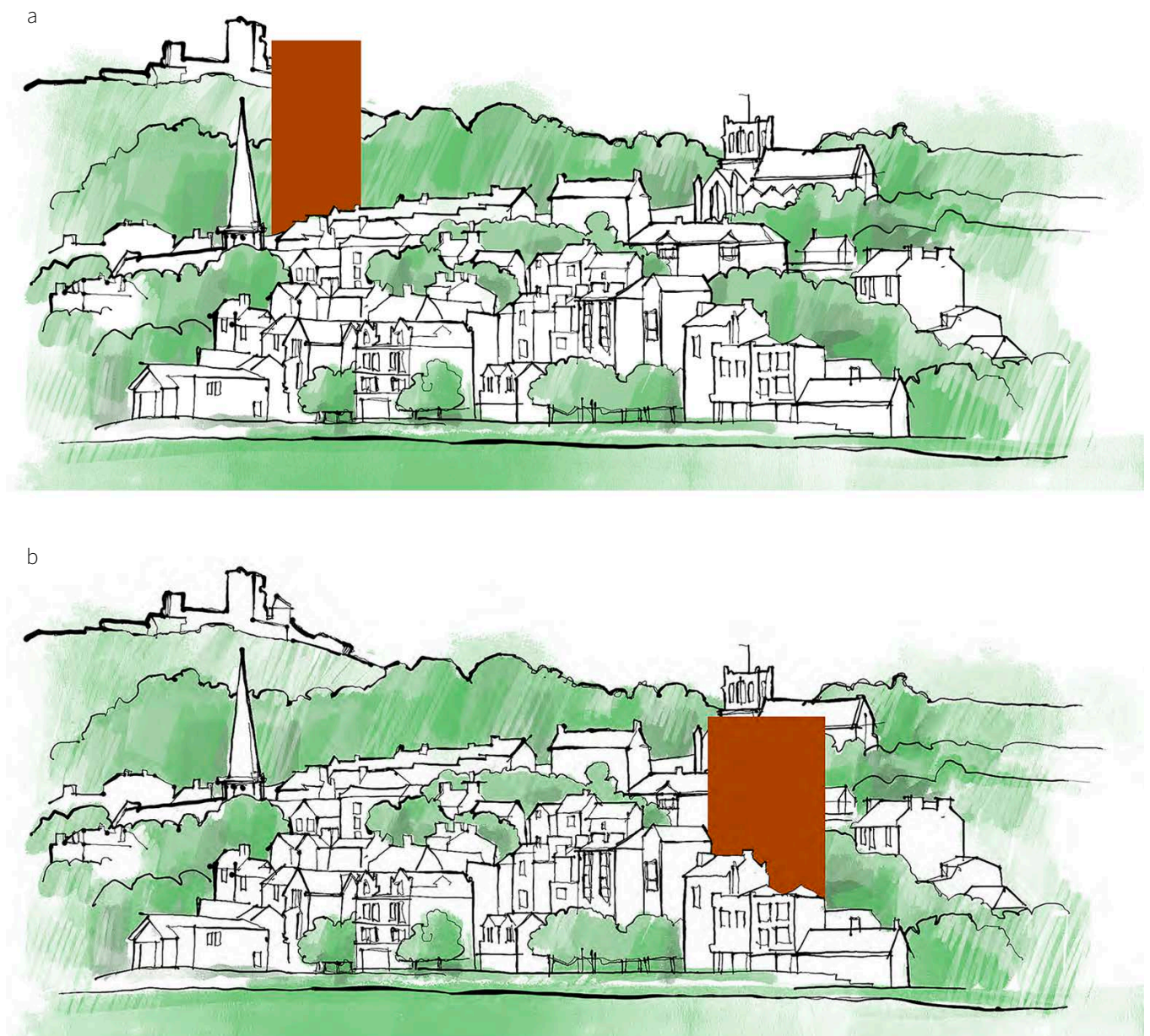


Figure 6: Examples of how tall buildings affect views, heritage assets and setting.
a: Example of a tall building visually competing with heritage assets and impacting the skyline.
b: Example of a tall building visually obstructing and visually competing with heritage assets.
© Historic England.

Case Study 3: 'Oxford High Buildings Technical Advice Note' (2018) and 'Assessment of the Oxford View Cones Study' (2015)

The Oxford High Buildings Technical Advice Note 'seeks to identify and protect what is important and provide opportunity for positive change and growth'. The Note helpfully defines a series of visual tests for tall buildings which may affect key views, areas, and/or heritage assets. These tests are:

- Visual obstruction;
- Visual competition/complement;
- Skyline; and
- Change of character.

Further analysis of assessments can help to establish the threshold at which a new building would begin to impact upon specific sensitive receptors.

The 'Oxford High Buildings Technical Advice Note' is informed by the 'Assessment of Oxford View Cones Study (2015)' and sets out the importance of key heritage views within the city to facilitate their preservation. The assessment method combines the five-step process for understanding setting and heritage significance set out in GPA3, and the practices of the Landscape Institute's 'Landscape and Visual Impact Assessment'.

Case Study 4: 'London View Management Framework' (LVMF)

The LVMF defines a three-step assessment process for managing strategically important views. It sets out information requirements and detailed technical guidance regarding visualisation tools.

The LVMF identifies and protects key views that include some of the capital's most significant historic landmarks. In so doing the LVMF considers some matters relevant to the historic environment and helps with some issues of setting. While it provides a useful starting point, matters relating to setting and significance of the historic environment still need to be addressed within heritage impact assessments.

4.9 Proactive policies that seek to manage views help demonstrate a positive strategy for the conservation and enhancement of the historic environment, especially in relation to tall buildings. Evidence from local views studies can be used to determine the suitability of sites and the appropriate scale or form for tall buildings. The evidence can also be used to identify opportunities where views can be enhanced informing urban design led approaches to managing townscape form.

Selecting tall building locations

4.10 A sifting process informed by mapping analysis and evidence set out in [Appendix 1](#) can be used to identify areas and sites for tall buildings. This approach takes account of factors such as character, townscape and landscape value and significance of heritage assets. The process can be used to identify locations where risk of impact on the historic environment from tall buildings proposals is either avoided or minimised. Sifting out sites to avoid planning for harm to heritage, based on a justified and sustainable approach, can help reduce risks to a plan's soundness and deliver good place-shaping.

Development plan policies

4.11 Policies that propose tall building development in specific locations should demonstrate that potential impacts on the historic environment have been considered. This should be justified through an appropriate strategy, taking into account reasonable alternatives (NPPF, paragraph 35). The London Plan (2021) includes a good example of a tall building policy that provides a clear direction for locating tall buildings (see [Case Study 2](#) of this advice note).

4.12 It is also important for tall building policies to emphasise the importance of avoiding and mitigating heritage impacts and to include specific criteria to do this.

Case Study 5: 'The Cambridge Local Plan' (2018)

Policy 60b is a good example of a policy that includes a clear criterion that requires applicants to consider the impact on the historic environment stating that, '...applicants should demonstrate and quantify the potential harm of proposals to the significance of heritage assets or other sensitive receptors, assessed on a site-by-site basis...'

The policy refers to key locally specific issues, such as requiring proposals to ensure that the character and appearance of Cambridge, as a city of spires and towers, remains dominant from identified viewpoints across the urban and rural landscape. The policy also specifies the sorts of assessments needed upon application.

Considering alternatives

4.13 Tall buildings are often a policy response to the need to deliver high density development. However, it is possible to deliver high density development using low to mid-rise building typologies as an alternative to tall buildings. Exploring how densities can be intensified through ‘gentle densification’ can help deliver multiple spatial planning objectives i.e. the delivery of housing and good place-shaping while still conserving the historic environment. Historic England’s research on ‘[Increasing Residential Density in Historic Environments](#)’ explores the factors that can contribute to delivering developments which successfully increase residential density in historic environments.

Re-development opportunities

4.14 When planning for regeneration or exploring redevelopment opportunities, the presence of an existing tall building that has been proven to have harmful impacts will not necessarily justify its replacement with a new tall building of the same or greater scale. Evidence may show that an area can be improved, or a heritage asset enhanced, by the replacement of a tall building with a lower building or a different solution altogether which re-integrates development into the historic street pattern and responds to the significance of nearby heritage assets. Alternatively, refurbishment of an existing tall building may be more appropriate than demolition and new build depending on local context and impact on the historic environment.

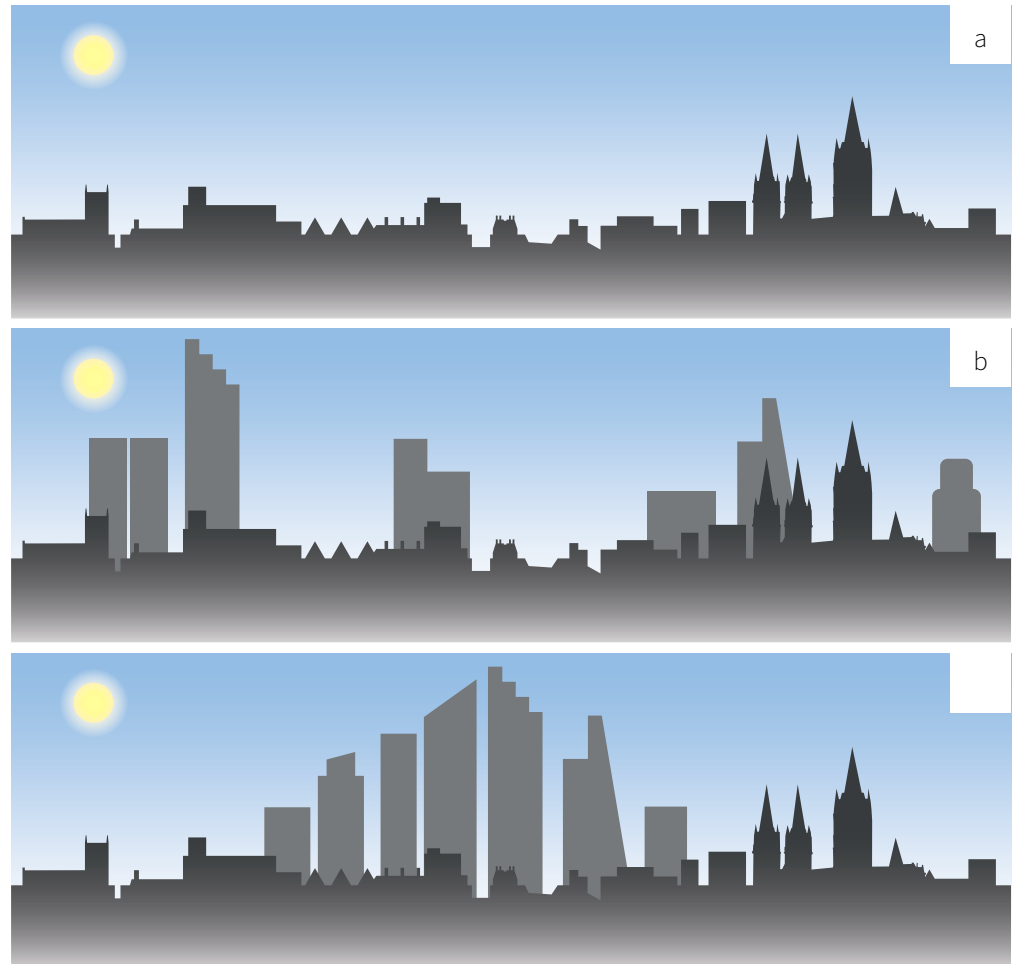
Tall building clusters

4.15 Strategically planning for tall buildings in clusters can bring townscape benefits while avoiding or reducing the potential impacts upon the historic environment. When considering the formation of tall building clusters, it is important to take account of:

- Maximum building heights and horizontal extent;
- Variations of building heights e.g. to allow the stepping down of heights towards the edges of the cluster, or to create layering of buildings that can add townscape interest;
- Cumulative impacts;
- Profile, silhouette and edges;
- Impact on and response to the historic environment; and
- How the townscape benefits of the cluster can be maintained.

Figure 7: Impact of tall buildings on a townscape / cityscape.

a: a town / city skyline.
b: dispersed tall buildings.
c: a tall buildings cluster.
© Historic England.



4.16 Establishing a consolidated form of tall buildings as a cluster can bring some benefits if it is well-defined, well-designed, integrated, and managed. Without careful consideration and long-term management there is a risk that the cluster could sprawl. If appropriately managed as an integrated whole, clusters can deliver high densities while minimising cumulative impacts that may be harmful to the historic environment. Policy and design guidance can be used to enable the curation of the cluster.

Case Study 6: 'Reading Local Plan (2019)'

Reading was experiencing development pressures with tall buildings being developed in multiple locations rather than in a single concentrated tall building zone. A dispersed distribution of tall buildings can result in an increased perception of mass and can have greater implications for heritage assets and setting.

Local Plan policy CR10 defines tall buildings and identifies several zones or clusters alongside locations where a maximum capacity for scale has already been reached and there is no longer scope for tall buildings. This provides a proactive, policy basis for the future

planning of tall buildings so that existing harm is not compounded and reduces adverse cumulative effects. This helps to optimise rather than dilute the townscape benefits of planned tall buildings.

The policy sets out detailed principles in relation to the clusters including identification of a primary cluster, space between buildings, design quality and stepping down in height from the centre of the cluster towards the edges. This helps ensure that future tall building development is delivered in a strategic way to provide townscape benefits and reduce potential illegibility that could be caused by an unchecked dispersal of tall buildings across the city.

5

Developing proposals for tall buildings

5.1 It is crucial to have a good understanding of the significance of any heritage assets that may be affected by a proposal, as well as the character of the place, at the earliest possible stage. This understanding should inform the design process so that tall building development can respond effectively to the historic environment and overcome potential issues that might arise further along the application process.

5.2 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise, and so the development plan should be the starting point for applicants developing tall building proposals.

Pre-application stage

5.3 Early pre-application engagement with local authorities, communities, and statutory consultees is strongly encouraged (NPPF, paragraph 39). This will help identify issues early in the process so that resolution can be sought prior to application to aid speedy and efficient decision-making. Pre-application advice can help applicants:

- Understand the policy position of the LPA including which areas are suitable for tall buildings and where there are historic environment considerations.
- Agree what illustrative material and digital models are available and likely to be needed, so that the impact of a tall building on the historic environment can be fully assessed by the LPA.
- Verify the zone of visual influence of a proposal, utilising digital tools, to agree the extent and type of impact assessment required (see Historic England's [Good Practice Advice Note 3: The Setting of Heritage Assets](#), paragraph 21).
- Understand the local character of areas that may be affected by the proposal.
- Determine which heritage assets are likely to be impacted by development proposals.

- Gain an early understanding of the significance of these heritage assets, including the contribution made by their setting. This will mean the impact of the proposal on significance, and the ability to appreciate that significance, can be adequately assessed.
- Agree an approach for design review – a design review panel is one established tool to assess design proposals at the pre-application and application stages.
- Identify what supporting information may be required, for example, heritage impact assessment for World Heritage Sites¹⁰ (see [checklist 2](#)).
- Explore ways to positively respond to the historic environment.

Design stage

5.4 Chapters 12 and 16 of the NPPF emphasises the importance of good design which contributes positively to local character and distinctiveness. A high-quality development will have a positive relationship with topography, unique character of place, heritage assets and their settings, height and scale of development (immediate, intermediate, and town- or city-wide), urban grain and streetscape, skyline and existing prominent or tall buildings of importance or merit, green and blue spaces, and important views.

Visualisations

5.5 Using visualisations can help communicate the proposed appearance of new developments. Done well they can give a clear understanding of how a tall building sits within its context. Visualisations are essential for assessing the impacts of proposals in visual, heritage and townscape terms.

5.6 Visualisations are also effective ways to show and assess the cumulative impact of a development alongside other existing and proposed tall buildings. Such visualisations are useful to indicate the scale of impact on and change to the historic environment.

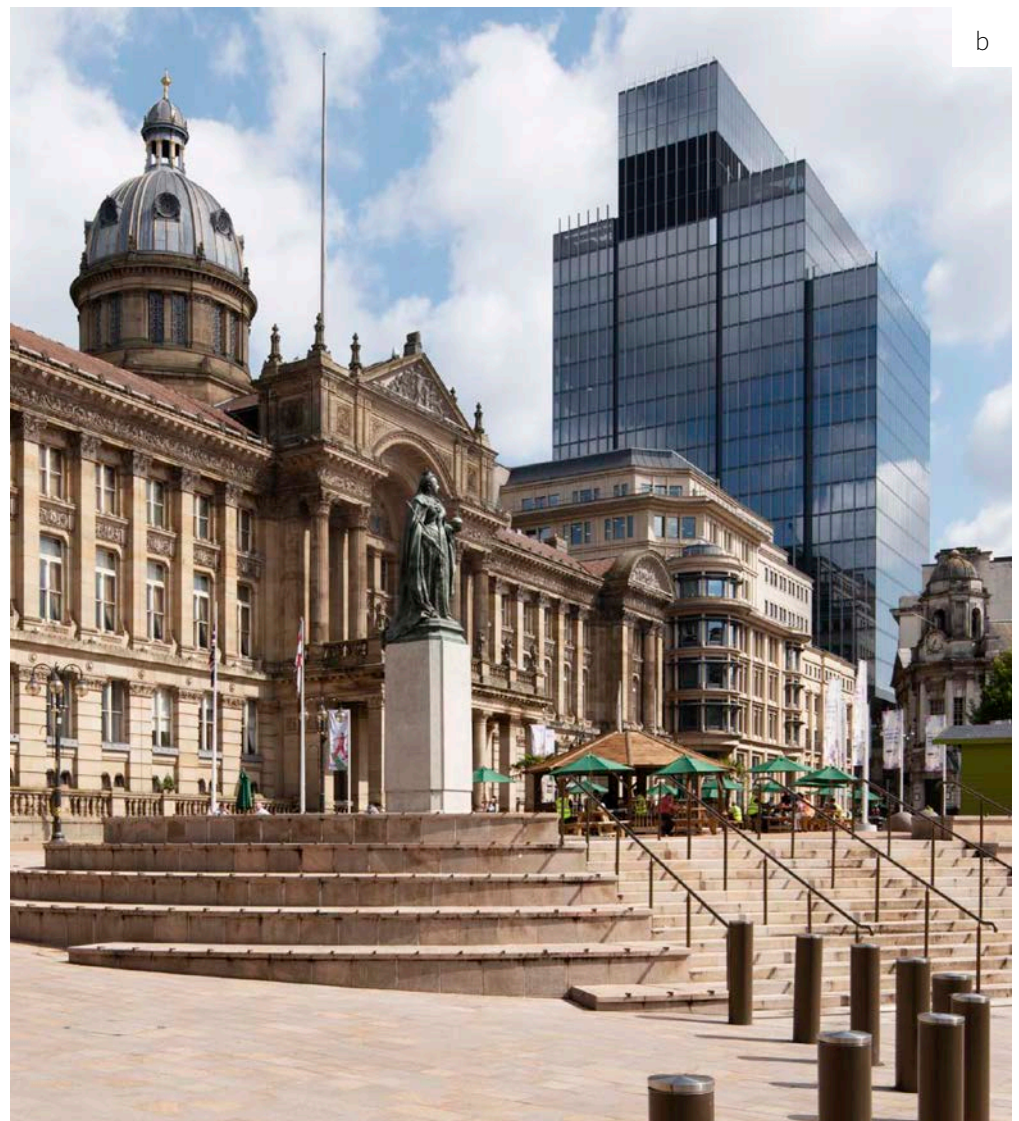
5.7 When preparing visualisations, a key point to consider is how best to reflect the human visual experience, especially that from street level. The ‘Guidelines for Landscape and Visual Impact Assessment’ (GLVIA3) recommend achieving this by setting a height for eye-level of 1.5m, although up to 1.7m would be acceptable. Representing the human visual experience also informs the choice of camera equipment alongside the perspective chosen¹¹. It is good practice for visualisations

10 Planning Practice Guidance 053 ID: 18a-035-20190723

11 <https://www.landscapeinstitute.org/technical-resource/landscape-visual-impact-assessment/>

to be prepared showing different seasons, night and day, and different weather conditions, including illustrating the maximum effects or 'worse case' scenario.

Figure 8: Birmingham.
a: Visual representation of Colmore Row at night.
© Sterling Property Ltd.
b: Photograph of Colmore Row in daylight.
© Historic England.

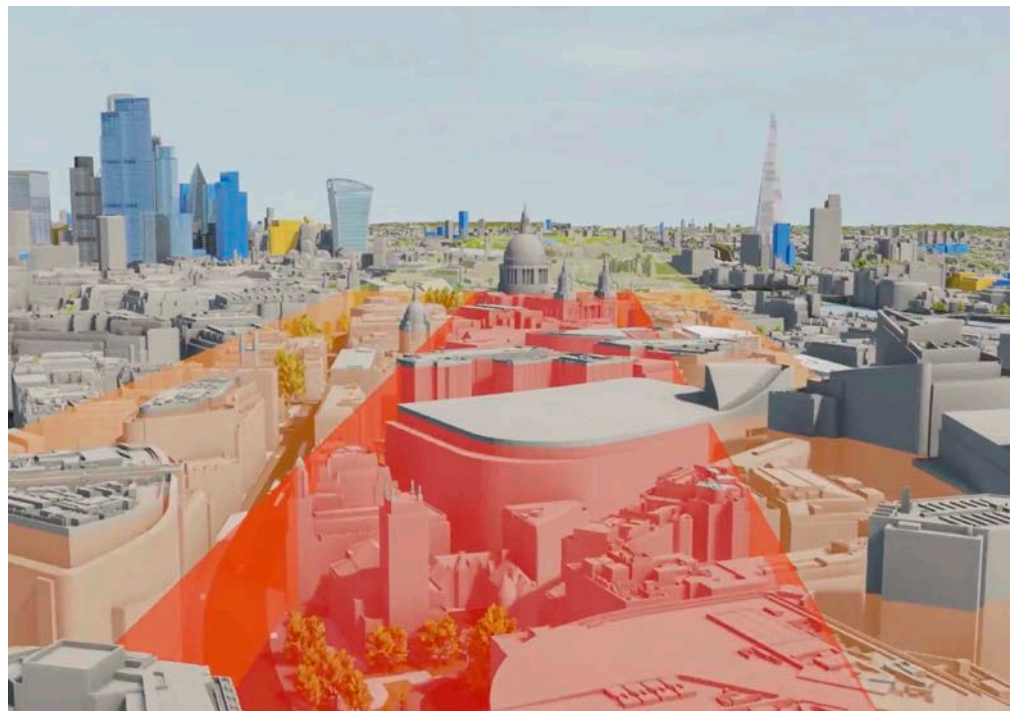


5.8 There are various types of illustrative material which could be submitted alongside proposals:

- **Technical drawings:** these form an essential part of the planning application. Architectural drawings with heights expressed in metres (not just storey heights), above ground level and Above Ordnance Datum (AOD), assist decision makers by clearly describing heights. It is good practice for full elevations/sections to be supplemented by details in section and elevation at an appropriate scale.
- **Accurate visual representations and three-dimensional models:** photography (taking account of good practice visual representation techniques in the Landscape Institute’s ‘Technical Guidance Note’¹²) helps describe a proposal’s impact by illustrating the context. Where available and appropriate, images produced using computer models are helpful supplementary information to technical drawings, providing an opportunity to illustrate what the development would look like. Proposals can be viewed dynamically within the programme environment and alternative options can be tested. It is important to differentiate between representations created for technical assessment and those produced for marketing purposes.

Digital models which include historic environment data can assist with the testing of alternative configurations, layout, scale and massing to inform plan-making and planning applications. Use of such technologies should be proportionate to the scale of the proposal and the significance of heritage assets.

Figure 9: Example of a 3D city model of London showing protected vistas of the London Views Management Framework, and designated heritage assets.
© Vucity.



12 See Landscape Institute TGN 06/19.

- **Zones of Visual Influence (ZVI), also known as Zones of Theoretical Visibility (ZTV)¹³:** these are a useful model to show the visual ‘line of sight’ or catchment area from which a development can potentially be seen. At pre-application stage ZVI/ZTV are a useful initial tool for understanding the potential impact of a tall building. As they use terrain models, important elements like trees or existing buildings may be excluded. but they remain a useful aid.

A heritage site assessment can usefully support the selection of viewpoints and guide the extent of the initial catchment area for ZVI/ZTV modelling, so that areas for environmental impact testing are not drawn with too small a radius around the immediate site. This approach is particularly helpful for places where tall buildings might affect suburban conservation areas whose significance and character lies in their isolation from the city centre.

Case Study 7: ‘Hadrian’s Tower, Newcastle’

Hadrian’s Tower is a 26-storey residential building completed in December 2020. The site is located within the Central Conservation Area of Newcastle and is within the setting of listed buildings, scheduled monuments and locally listed buildings.

The planning application for Hadrian’s Tower was supported by a broad range of visualisations which assisted in determining the application, including:

- Identification of a zone of theoretical visibility and zone of visual influence;
- Important aspects of the development’s potential effects conveyed through variant options such as views at night and seasonal views; and
- Depiction of cumulative effects using blocks to communicate the volume of combined proposals and associated change to the character of the area.

However, in some images the tower was depicted using increased transparency, reducing its visual prominence within the view. This highlights the potential for variation between visualisations and completed schemes.

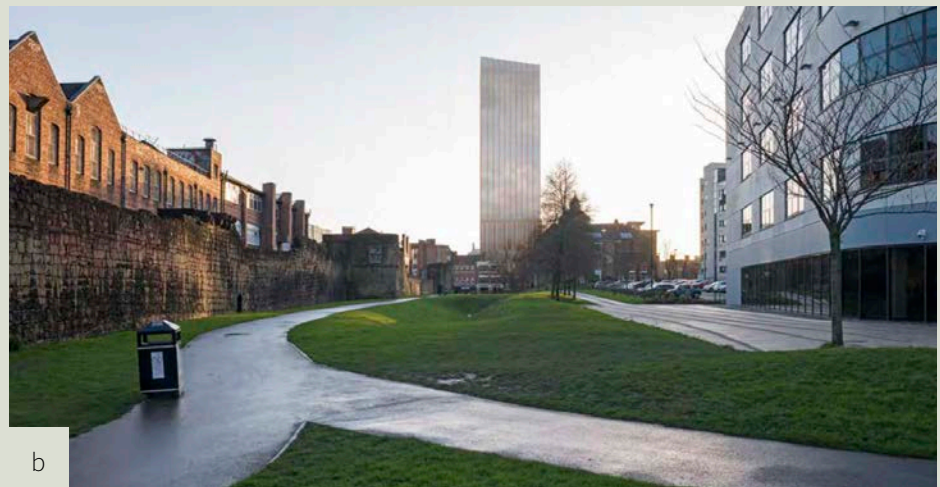
13 Zone of Theoretical Visibility (ZTV)/ Zone of Visual Influence (ZVI) assessments are computer generated models using specialist software to identify the visibility of a development and can provide a ‘heat map’ of visibility around the site. ZTV / ZVI assessments are a part of the Landscape and Visual Impact Assessment output and provide a method for determining viewpoint locations. Along with site visits, they allow viewpoints to be selected based on actual and not assumed visibility.

Figure 10: Hadrian's Tower, Newcastle.

a: Visualisation showing the proposed tall building during spring / summer.

b: Photograph showing the tall building (as built) during the winter.

© The High Street Group / Faulkner Brown Architects



Identifying viewpoints

5.9 The number of views selected for analysis should be based on the specifics of the development proposed and potential impacts that may occur relative to the significance of heritage assets that may be affected. Viewpoint analysis can make use of the following:

- **Fixed views:** views from a defined, single point are a helpful starting point when considering the impacts upon designed views or views identified in development plans and conservation area appraisals. Designed views can include those intended to be seen from within buildings as well as through designed gardens and landscapes.
- **Kinetic views:** also known as dynamic views, kinetic views allow a more experiential representation of the potential impacts by indicating how moving through a place can change the visibility of a tall building. Kinetic views can allow an appreciation of hidden and revealed views which often add interest to character of an area and can improve the appreciation of the historic environment. These can better reflect the experience of heritage assets and their settings.

Mitigation

5.10 Developing tall buildings in the right locations and at the right heights can have a positive influence on place-shaping with minimal or no impact on the historic environment. However, it is acknowledged that there may be some circumstances where potential impacts on the historic environment will occur; these can be reduced through mitigation measures.

5.11 Mitigation measures can involve:

- Locating taller elements of a development on less sensitive parts of a site, by carefully considering layout;
- Creating a human scale experience by setting tall buildings back from the street and/or ensuring that the base of the tall building enhances or better reveals heritage assets, historic street patterns and spaces;
- Designing the tall building to be sympathetic within the local context using materials, massing, and discrete or subtle architectural and functional features;
- Minimising the bulk of tall buildings, especially at their tops, to help reduce the overall perception of mass; and
- Designing the tall building to take account of the profile and silhouette of a cluster, and prominence of the cluster within the historic town or cityscape.

Figure 11: An example of a tall building set back from the street. View from Angel Row looking towards Beast Market Hill, Nottingham.



Planning applications and supporting information

5.12 When submitting a planning application for a tall building, proportionate supporting information is required to describe the impacts on the historic environment.

5.13 Having precise and accurate supporting information is critical for decision-making for LPAs and improves the efficiency of the process. Checklist 2 below, sets out the supporting information needed for tall buildings applications which have a potential impact on the historic environment.

5.14 Preparing separate Heritage Impact Assessments (which include heritage-related visuals) and Townscape Visual Impact Assessments can help ensure that heritage significance is effectively described. Having separate assessments can ensure that impacts are understood and assessed in relation to harm to the significance of the historic environment, and effects on townscape character. Historic England's Good Practice Advice in Planning Note 2: [Managing Significance in Decision-Taking in the Historic Environment](#) and 3: [The Setting of Heritage Assets](#) provides useful guidance on understanding the significance of heritage assets.

5.15 Where an Environmental Impact Assessment (EIA) is required, it is good practice to consider alternatives through the iterative design process. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹⁴ set out a clear direction in cases where alternative options for a development proposal have been considered. The legislation requires 'the applicant to include in their Environmental Statement a description of the reasonable alternatives studied (for example in terms of development design, technology, location, size and scale) and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects¹⁵.'

14 Paragraph 2, Schedule 4 of the 'Town and Country Planning (Environmental Impact Assessment) Regulations 2017'.

15 PPG paragraph 041 ID:4-041-20170728

Checklist 2: Tall Building Application – Supporting Information

Supporting Information	Purpose	Timing
Statement of Heritage Significance	Description/Information	Prepared early in the design process to allow a good understanding of the heritage significance of individual assets, and the wider character of the area. A Statement of Significance is often a necessary component of more explorative impact assessments.
Heritage Statement	Understanding impact	The purpose of these is to explain proposals, tie them back to significance, and justify the scheme put forward in order to aid decision making.
Heritage Impact Assessment Separate ICOMOS Heritage Impact Assessments or World Heritage Sites (WHS)	Understanding impact	<p>These are carried out most often at the earliest possible stage and are used to inform the design process rather than justifying it post-design.</p> <p>The Operational Guidelines for the Implementation of the World Heritage Convention (2019) stress the importance of Heritage Impact Assessment, noting at paragraph 118 that these should ‘be a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property.’</p> <p>For World Heritage Sites these are necessary at the beginning of the design process to avoid negative impacts on Outstanding Universal Value.</p>
Character/Landscape Assessment Townscape and Visual Impact Assessment (including zones of visual influence / zones of theoretical visibility).	Assessment and justification	<p>Depending of the specific characteristics of a site, these may be need at plan-making stage in order to support site allocations.</p> <p>Generally, they are prepared during the early stages of the design process to inform the tall building’s relationship with its context. They are also refined as the design process progresses so they can be used at application stage to illustrate the potential impacts and appearance of a development.</p>
Planning and Tall Building Statement	Assessment and justification	Prepared and submitted alongside the application.
Design and Access Statement	Justification	Prepared and submitted alongside the application.
Environmental Impact Assessment/Statement (subject to LPA confirmation).	Understanding impact	To commence at the start of the application process and be submitted alongside the application.
Accurate technical drawings	Description/information and assessment	<p>These must be submitted upon application and are ultimately what is quoted on any decision notice.</p> <p>Drawings are likely to be subject to continued review until a final scheme is approved or refused.</p>

5.16 The following case study provides an example of the types of supporting information prepared alongside a tall building application, to understand the impact of proposals on the historic environment and refine proposals in response to local context.

Case Study 8: St Michaels, Manchester

St Michael's is a major city centre regeneration scheme in Manchester located close to the city's Grade I listed Town Hall. A planning application was registered in January 2017 proposing the clearance of the site and the development of two tall buildings.



Figure 12: Proposals for St. Michaels viewed from Albert Square Manchester.

a: Initial proposal.

b: Revised proposal.

© Hodder + Partners

The scheme is located within the Deansgate/Peter Street Conservation Area, with several Grade II listed buildings in the immediate setting of the site and Grade I and Grade II* listed buildings located in the wider context. Within the site boundary the unlisted former Bootle Street police station and the Sir Ralph Abercromby pub were considered to have heritage merit. Concerns were raised about the original scheme design, including that the two tall buildings would harm the significance of highly graded listed buildings such as the Town Hall and Library.

Following concerns from the public and consultees, the scheme was fully re-designed to consider its townscape, visual and heritage impact. Revised proposals were approved in 2018.

The revised application was submitted with:

- A Design and Access Statement;
- Planning and Tall Buildings Statement informed by advice from Historic England's Advice Note 4 Tall Buildings;
- Environment Statement (which included a townscape visual impact assessment);
- A Heritage Statement informed by advice from Historic England's Good Practice in Planning 3 'The Setting of Heritage Assets'; and critically
- Kinetic verified views from different directions walking towards the Town Hall and Library in order to fully understand the impact of the proposed development on the setting of these highly significant civic buildings.

The revised design retained important unlisted heritage assets, proposed only a single tower which was pushed further away from the Town hall and Library and rotated 90 degrees in order to reduce its visual impact in key views. The detailed supporting information was comprehensive and critical in understanding the impact of the scheme on the historic environment. In particular, the visualisations and kinetic verified montage methodology showing the changing experience of the scheme, at human scale informed the changes to the tall building element of the proposal.

6

Assessing proposals

6.1 Historic England’s Good Practice Advice in Planning Note 2 provides advice on ‘[Managing Significance in Decision Taking](#)’ which is of relevance to LPAs when deciding applications. Many of the heritage implications that arise with proposals for tall buildings are the same as for other applications. However, tall buildings proposals frequently raise the following issues:

- Location and height parameters;
- Context and local character;
- High quality design;
- Significance and risk of harm to the significance of the heritage asset; and
- Cumulative impacts.

6.2 Local validation checklists can support consistency in the level of supporting information required.

6.3 When assessing planning applications, it is important that any public benefits cited are carefully appraised. PPG paragraph 20¹⁶ defines public benefits. Key considerations for LPAs are the ability to secure public benefits from tall building development in the first place, their longevity and the ability to preserve stated benefits in the future through the planning process.

6.4 A comprehensive review of the extent and nature of any public benefits, the means of their delivery, and their justification will be carried out by decision makers in light of potential harm and long-term impacts on the significance of heritage assets and the integrity of historic townscapes. The conservation of the historic environment is itself a public benefit and secures its existence for future generations.

16 <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>
Paragraph: 020 Reference ID: 18a-020-20190723

Assessing cumulative impact

6.5 It is important for LPAs to consider cumulative impacts of tall building proposals with other existing tall buildings, to fully understand the impacts they might have so that:

- Where harm already exists, it is not compounded;
- The positive relationships that exist between existing tall buildings and the wider area are not compromised by new tall buildings; and
- Legibility does not become confused and tall landmarks do not begin to compete.

Policy gaps

6.6 In the absence of tall buildings policies and site allocations, tall building proposals should be assessed against the NPPF (including the historic environment policies in chapter 16) and have regard to the statutory duties in the Planning (Listed Buildings and Conservation Areas) Act 1990. Development plan sustainable development policies and place-shaping policies relating to building height, massing and scale can also be used to inform decision-making.

7

Appendix 1

Development plan heritage and tall buildings evidence

Evidence	Use	Information sources
<p>Site Specific/Area Based Heritage Assessments</p> <p>(Can be completed for individual sites or groups of sites or areas).</p>	<ul style="list-style-type: none"> ■ To support the inclusion of tall buildings allocations and policies in relation to the historic environment. ■ To evidence and justify the exclusion tall buildings from these locations. ■ To inform detailed development guidance and justify heritage and design policies in development plans and SPDs. 	<p>Historic England Good Practice Advice in Planning 2: Managing Significance in Decision Taking in the Historic Environment</p> <p>Historic England Good Practice Advice Note 3: The Setting of Heritage Assets</p> <p>Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans</p>
<p>Statement of Heritage Significance</p> <p>(Can be completed for multiple heritage assets).</p>	<ul style="list-style-type: none"> ■ To form part of an assessment rather than being a standalone document. ■ Informed by mapping to identify the location and significance of heritage assets above and below ground. ■ To inform the identification and mapping of protected views. 	<p>Historic England Advice Note 12: Statements of Heritage Significance</p> <p>Historic England Good Practice Advice Note 3: The Setting of Heritage Assets</p>
<p>Conservation Area Appraisals</p>	<ul style="list-style-type: none"> ■ To understand significance, special local character and context. ■ To inform tall building height, mass, and design. ■ To inform analysis of protected views. 	<p>Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management</p>
<p>World Heritage Site – Heritage Impact Assessments</p>	<ul style="list-style-type: none"> ■ To evidence and justify exclusion of World Heritage Sites from tall building development. ■ To inform site specific policies and area designations in plan-making and tall building policy development. ■ To inform the identification and mapping of protected views. ■ To consider impacts on Outstanding Universal Value. 	<p>International Council on Monuments and Sites: Guidance on Heritage Impact Assessments 2011</p> <p>Historic England Good Practice Advice Note 3: The Setting of Heritage Assets</p>
<p>Sustainability Appraisal/ Integrated Assessment</p>	<ul style="list-style-type: none"> ■ Evaluation and discounting of options for the location of tall buildings. 	<p>Historic England Advice Note 8: Sustainability Assessment and Strategic Environment Assessment</p>

Evidence	Use	Information sources
Tall Buildings Study/ Urban Design and Townscape Analysis	<ul style="list-style-type: none"> ■ To identify high landscape or townscape value. ■ To inform tall building policies and guidance including building height, mass and design. ■ To identify protected views. 	National Design Guide (2021) National Model Design Code (2021)
Landscape and Townscape Visual Impact Assessment/ Views Assessment/ Inter-visibility Study	<ul style="list-style-type: none"> ■ To test protected views and options for the location of tall buildings. ■ To inform tall building policies and guidance including building height, mass and design. 	Guidelines for Landscape and Visual Impact Assessment (2013, Landscape Institute) Historic England Good Practice Advice Note 3: The Setting of Heritage Assets
Characterisation Studies	<ul style="list-style-type: none"> ■ To understand local character. ■ To set the existing contextual height and inform the local definition of a tall building. ■ To identify areas of potential impact to significance from tall building proposals. ■ To inform guidance or design coding on building heights across a development plan area. 	National Design Guide National Model Design Code (and Guidance Note) Historic England's Characterisation Thesaurus
Masterplans	<ul style="list-style-type: none"> ■ To understand local character and context. ■ To assist with options analysis. ■ To inform design and tall buildings policies. 	National Design Guide National Model Design Code (and Guidance Note)
3D Modelling (LPAs may have access to city-wide 3D models).	<ul style="list-style-type: none"> ■ To support understanding of potential impacts from tall building proposals. ■ To assist with the options analysis for the location, building mass and height of tall buildings. ■ To inform the risk of harm to the historic environment from the location, height and mass of tall buildings. ■ To inform protected views analysis. 	Visualisation of Development Guidance (2019, Landscape Institute)
Early engagement and consultation reports.	<ul style="list-style-type: none"> ■ To ensure local community, including Neighbourhood Plan groups, input into plan-led tall building policies and development. 	NPPF PPG
Duty to Co-operate reports.	<ul style="list-style-type: none"> ■ To assist with cross boundary engagement on tall buildings proposals and the historic environment in neighbouring local authority areas. 	NPPF PPG

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