



# Review of Height and Tall Building Policies



## Summary

### ***Why does Guildford need a Heights Policy?***

*To protect*

- *Guildford's urban character, townscape, skyline, and public spaces from development that is excessive in scale and especially height.*
- *Guildford's heritage and sensitive historic areas, especially Guildford's town centre from inappropriate developments.*
- *Guildford's unique gap town setting with views to and from surrounding hills and countryside*
- *other centres in the Borough e.g. Villages from development that excessive in height, which can also impact surrounding country areas.*
- *Street environments where high buildings built without due consideration can make for pedestrian 'unfriendly spaces'*

*A heights policy will encourage greater consideration of the scale of new developments within their context and how their design quality can be maximised.*

*It should be noted high buildings can be inefficient in their use of land, particularly with the introduction of planning regulations to have two staircases above 18M. Careful design can provide equivalent densities at lower heights.*

*Currently Guildford is out of step with similar towns and cities by not having appropriate heights or tall buildings policies for today's development environment.*

### ***The Society's review***

*To assist understanding of Heights Policies and to assist decision makers, The Guildford Society have considered in detail Heights and Tall Building Policies and Guidance from Historic England and the National Design Code. We have assembled and analysed a number of Heights or Tall Building Policies from other towns or cities selected because of their relevance to Guildford. In many of these examples, the towns or cities have, similar to Guildford, considerable numbers of heritage buildings. The majority have historic town or city centres. A number also have varying or undulating topography not dissimilar to Guildford's.*

*Our full review of seven policies follows at 2. below. We have been particularly impressed by four policies Canterbury, Oxford, Winchester and Windsor and Maidenhead.*

### ***A summary of our analysis***

#### *a. Sophistication Required*

*Policies avoid simplistic blanket height restrictions as we have heard suggested for Guildford. Examined Policies take a wider approach to considering if and where 'tall buildings' should be permitted. They define their understanding of 'tall buildings'. Most require consideration of the context of a development and its impact on streetscapes, skylines, urban spaces, heritage, etc.*

*b. Definition of a tall building?*

*Tall of High Buildings are defined differently depending upon each city, town, (or village) requirements. In some a tall building is anything over 18 or 19 metres in others they are buildings with a height proportionately higher than their surrounding context. Note heights can be applied on a zonal basis e.g. Brighton has differing limits between Centre and Urban Area. See Section 3.1 for alternative methods for defining tall buildings.*

*c. Context can also influence height.*

*In addition to a definition of a tall building, policies often include a context height ratio (CHR), which expresses the degree of height of a building in relation to its local context. As an example if the local context is 4 storeys, a ratio of 1.25 would allow an extra floor to be added. See 3.1c below for more details.*

*d. Heritage*

*For applicable areas Heritage Assets are also recognised as limiting Height and Scale to avoid impacting heritage settings. This can also include incorporating views that require preservation. See Historic England Guidance in Section 1 below.*

**Production of Policies**

*Some of these towns and cities have produced Heights or Tall Buildings Policies as Supplementary Planning Guidance (SPGs) or Supplementary Planning Documents (SPDs) and some have included their policies in their local plans. It appears that some have developed and enhanced their policies over periods of time. Brighton and Hove started with a Tall Buildings Study, produced by consultants, then developed their Tall Buildings SPG which in turn has been incorporated in their Urban Design Framework SPD.*

**Other guidance**

*Guildford Society has considered other guidance. Two important sources for information are Historic England's Advice Note. 4 Tall Buildings and the National Model Design Code: Part 2. The first of these very helpfully sets out for planning authorities how to produce Tall Building Policies. See Sections 1 and 4 below.*

**Next Steps**

*If Guildford decides to progress with production of a Heights or Tall Buildings Policy it could produce an SPG, as possibly the quickest method of implementing a Heights Policy. It could assist the Council if it followed Oxford and Brighton by using consultants to produce the basis for an SPG. We believe the Council previously used consultants to prepare the Town Centre Views SPD.*

*Nic Allen February 2024 on behalf of The Guildford Society*

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## 1. HISTORIC ENGLAND GUIDANCE ON TALL BUILDINGS

The Guidance on Tall Buildings Advice Note published in 2015 by Historic England states:

*“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.”*

Helpfully this Historic England’s Advice Note. 4 Tall Buildings

<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/>

provides detailed advice for local authorities on how to prepare and structure their tall building’s policy. 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.

It helpfully includes a ‘Development Plan Tall Building Policy Checklist’.

## 2. REVIEW OF OTHER TOWNS AND CITIES HEIGHTS OR TALL BUILDINGS POLICIES

The Guildford Society have considered several policies and have selected seven for detailed review. Four we believe have particularly applicability, due to their approach, for Guildford:

### **2.1. Canterbury**

### **2.2. Oxford**

### **2.3. Winchester**

### **2.4. Windsor and Maidenhead**

The remainder have interesting elements and are presented at:

### **2.5. Brighton and Hove**

### **2.6. Cambridge**

### **2.7. Worthing**

Each of the councils of these towns and cities have adopted height control or tall building policies recognising the importance of controlling the height of new buildings. The approach taken differs between them. We have included these seven to provide a contrast between different approaches including the type of planning policy adopted and recognising some towns or cities have different characteristics to Guildford. Details of each of their policies and comments on these are included below. Following these is some analysis of these towns and cities policies.

## 2.1 Canterbury

Canterbury includes their heights/tall buildings' policies within their adopted 2017 Local Plan

<https://www.canterbury.gov.uk/sites/default/files/2022-10/Adopted%20Local%20Plan.pdf> .

Under the Urban Form and Scale section (p189) there are tight controls on height combined with the other relevant considerations for new development. Canterbury itself has a specific section. Extracts below illustrate their approach to tall buildings:-

*8.35 The scale and massing of development determines its visual impact and its effect on townscape. In assessing a proposed building's 'envelope' (height, width, massing and depth) consideration will be given to its relationship with heritage assets, local topography and the effect on skylines. Consideration will also be given to the effect that a proposed building's mass can have on amenity (including; overshadowing; loss of sunlight and daylight; and, creating an adverse micro-climate). **The general policy is that new buildings should be based on the heights of existing buildings, particularly in historic areas.** This relates to both the height of the building and also to the street enclosure ratio. Accommodating growth will require a relatively high density of development. **Tall buildings (over five storeys) are not considered necessary to achieve this and most parts of the District are not considered suitable for tall buildings. High density development does not have to involve building high or disrupting the urban grain. With skill and care it is possible to incorporate large modern uses within the grain of historic places.** Tall buildings (over five storeys) need to be designed with an appreciation of the context in which they are to be built. If proposals have a detrimental impact in terms of overshadowing, loss of sunlight, or would be overbearing on their surroundings they will be refused permission.*

*8.36 Planning applications for tall buildings (over five storeys) should be accompanied by accurate and realistic representations of the proposed building. These representations should show the proposed development in all significant views affected including the public realm, streets adjacent to the site and long distance views. The appearance of the building should be accurately rendered in a range of weather and light conditions including a night-time view.*

## 2.2 Oxford

Oxford is a relatively small city, hemmed in by its rivers, the Thames and Cherwell, and surrounded by green hills. From many places within the city it is possible to glimpse the surrounding countryside, so it has some similarities to Guildford.

Both Oxford's Adopted Local Plan 2036 at page 91

[https://www.oxford.gov.uk/downloads/file/7380/adopted\\_oxford\\_local\\_plan\\_2036](https://www.oxford.gov.uk/downloads/file/7380/adopted_oxford_local_plan_2036) and

Oxford's emerging Local Plan 2040 page 129

[https://www.oxford.gov.uk/downloads/file/8759/oxford\\_local\\_plan\\_2040\\_proposed\\_submission\\_draft](https://www.oxford.gov.uk/downloads/file/8759/oxford_local_plan_2040_proposed_submission_draft)

include policies on Tall Buildings. In the Adopted Plan Policy DH2 and in the 2040 Plan Policy HD9 both titled Views and Building Heights. These policies are supported by a detailed Technical Advice Note (TAN) Oxford High Buildings

[https://www.oxford.gov.uk/downloads/file/5085/high\\_building\\_study\\_-\\_technical\\_advice\\_note](https://www.oxford.gov.uk/downloads/file/5085/high_building_study_-_technical_advice_note)



It appears the City altered or relaxed its policies on tall buildings. The most recent version of the tall buildings policy is more versatile, opening up the possibility of new positive contributions to the skyline. This has been a controversial change, and the question as to whether new elements might be appropriately added to what is an iconic profile, is complicated.

This is an extract from Conservation Wiki's article on Intensifying Development in Oxford [https://www.designingbuildings.co.uk/wiki/Intensifying\\_development\\_in\\_Oxford](https://www.designingbuildings.co.uk/wiki/Intensifying_development_in_Oxford)

*Looking at the present character of the city's residential suburbs, relatively low-rise housing, and sensing the pressures on the individual colleges and universities to improve their facilities, the city's planners began to consider tall buildings. Would it be possible to make good places for people with beautiful spaces around them without harming the skyline? The topography meant that building not very high in certain places would be substantially harmful to other places. It might, however, be possible to increase densities, building up with medium-density housing surrounded by exciting outdoor spaces, and not impact on the important views of the 'dreaming spires' or out from the city to its amphitheatre of surrounding hills.*

*Working with a local landscape architecture practice and engaging local stakeholders, the city council developed a policy supported by a technical advice note (TAN) for high buildings. Neither the TAN nor the policies that it supports seek to be prescriptive. The purpose is to establish a method that can be applied to each case to establish the impact that a design would have on important and protected views. The document is intended as a tool for positive, iterative design, based on an understanding of the impact of a design with regard to a building's height, mass and appearance.*

Oxford's Local Plan 2040 requirements for planning applications involving High Buildings are quite detailed and include use of VuCity:-

*Applications for any building that exceeds 15 metres (or the height that the High Buildings Technical Advice Note says may be impactful in that area if that is higher) will be required to provide extensive information so that the full impacts of any proposals can be understood and assessed, including:*

- e) a Visual Impact Assessment, which includes the use of photos and verified views produced and used in a technically appropriate way, which are appropriate in size and resolution to match the perspective and detail as far as possible to that seen in the field, representing the landscape and proposed development as accurately as possible (produced in accordance with the Landscape Institute's GLVIA 3d Edition and Technical Guidance note TGN 06 19 or updated equivalents); and*
- f) use of VuCity 3D modelling (or equivalent if updated by the City Council in future), shared with the City Council so that the impact of the development can be understood from different locations, including any view cone views that are affected; and*
- g) if harm is caused to a heritage asset or its setting, a full explanation of other options that have been considered that may be less harmful, a justification that the benefits outweigh the harm and open book viability assessment if relied upon in the explanation.*

## **2.3 Winchester**

Winchester's only current policies on building heights that were found are embodied in their Central Winchester Regeneration SPD adopted in June 2018

<https://www.winchester.gov.uk/planning-policy/winchester-district-local-plan-2011-2036-adopted/supplementary-planning-documents-spds/central-winchester-regeneration-spd>

This comprehensive and detailed SPD sets out the Planning and Urban Design Framework for the central area of Winchester. Specific guidance on Heights, Scale and Massing is covered in Section 3.10, page 63.

## **2.4 Windsor and Maidenhead**

This unitary authority's Adopted Borough Local Plan 2013-33 (adopted Feb 2022)

<https://www.rbwm.gov.uk/home/planning-and-building-control/planning-policy/development-plan/adopted-local-plan>

contains a Policy on Building Heights. Policy QP3 page 54, para 6.14 Building Height and Tall Buildings, sets out the Council's approach to tall buildings. It refers to their more recently completed Building Heights and Tall Buildings SPD

<https://www.rbwm.gov.uk/home/planning-and-building-control/planning-policy/planning-guidance/adopted-supplementary-planning-documents-spds/building-height-and-tall-buildings-spd>

This is a very well-considered document and could be a useful example for Guildford to follow.

Their Policy QP3 contains their definition of tall buildings:-

*Definition of Tall Buildings and their height*

*6.14.2 A tall building is an exceptional development that is significantly higher than the buildings in its surrounding context and that notably breaks the skyline. As such, 'tall building' is a relative term. A building is considered tall in relation to the height of its surroundings, which is called the 'context height'. The context height is the height that an observer would read as the typical or defining height of a particular area.*

*6.14.3 The relationship of height between a tall building and its context can be expressed as a factor of the prevailing context height. This is the context height ratio (CHR), which expresses the degree of height of a building in relation to its context. This provides a measure of the extent to which a building is 'outstanding' on the skyline considering the prevailing height and scale of the existing place.*

*6.14.4 Tall buildings with a height of 1.5 to 2.5 times the context height will be prominent and outstanding features in an area. Thus, any building exceeding 1.5 times the context height of the surrounding area (or a minimum of 4 storeys in a 2 storey area) will be defined as a tall building for the purpose of Policy QP3a.*

## **2.5 - Brighton and Hove**

Brighton and Hove is much larger, is a coastal city and therefore has different challenges although like Guildford it is on the edge of the Downs (South Downs) and has very undulating topography. but because of its extent does have opportunities to create zones for taller buildings.



What are their policies?:-

- Initially they commissioned a Tall Buildings Study. This was basis for
- Tall Buildings SPG (applicable to buildings over 18m (approximately 6 storeys)  
[https://www.brighton-hove.gov.uk/sites/default/files/migrated/subject/inline/downloads/localplan2001/15\\_SPGBHTall\\_buildings.pdf](https://www.brighton-hove.gov.uk/sites/default/files/migrated/subject/inline/downloads/localplan2001/15_SPGBHTall_buildings.pdf) .
- This SPG we understand has now been superseded by Urban Design Framework SPD17  
<https://www.brighton-hove.gov.uk/sites/default/files/2023-05/SPD17%20UDF%20low%20res.pdf>  
which includes a detailed section on tall buildings and tall building zones. This Urban Design Framework comprehensively covers all aspects of urban design. Although the tall buildings section focuses on buildings over 18m (approximately 6 storeys) it also states *‘Significantly taller buildings are those in excess of 15% taller than mean height of surrounding development within a radius of 100 metres in all directions from the proposed footprint.’*

## **2.6 - Cambridge**

Cambridge is a city with a considerable number of heritage buildings. In 2006 the Council produced its initial Tall Buildings and the Skyline policy as part of their Local Plan.

<https://files.cambridge.gov.uk/public/ldf/coredocs/RD-SPD-240.pdf>

Their 2018 Local Plan now incorporates as Policy 60, Tall Buildings and the Skyline in Cambridge with detail in Appendix F, page 327

<https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf>

This is a very well-considered policy which is part of a comprehensive set of policies under their Local Plan. Section Seven: Protecting and enhancing the character of Cambridge includes this statement on tall buildings:

*7.18 There are a large number of designated heritage assets within the historic core, including a significant number of highly graded heritage assets of great national importance. Accordingly, the potential impact that a proposal for a tall building have on the significance of those assets will be a critical factor in the consideration of the proposal. For this reason, it is very unlikely that there would be many instances or scope for introducing new tall buildings in or around the historic core. P187*

*In the Cambridge context, a tall building shall be defined as:*

*“Any structure that breaks the existing skyline and/or is significantly taller than the surrounding built form.” P329*

## **2.7 - Worthing**

Worthing Borough Council in their adopted Worthing Local Plan 2023-2036 include a policy that covers tall buildings. This is in their Development Management Policies, Policy DM5 page 111 Quality of the Built Environment

<https://www.adur-worthing.gov.uk/media/Media,169492,smxx.pdf>

It states:-

*The relatively compact form of the borough and the constrained nature of the surrounding areas means that pressure to build upwards is likely to continue. To ensure that efficient use is made of available land the Council will positively consider applications for tall buildings on sites that can appropriately accommodate buildings of height. Whilst this form of development can contribute towards meeting housing needs it is acknowledged that tall buildings can be assertive and dominant due to their visibility. In response to this, the Council has published a Tall Building Guidance Supplementary Planning Document (SPD) which helps to lead taller buildings to the most appropriate sites and sets out the criteria by which the quality of developments will be assessed and controlled.*

The support details for this policy are in their Tall Buildings Guidance SPD <https://www.adur-worthing.gov.uk/media/Media,117751,smxx.pdf>

### 3. ANALYSIS OF SOME KEY POINTS IN THESE HEIGHT/TALL BUILDING POLICIES

3.1. Definitions of Tall Buildings

3.2. Policy considerations

3.3. Assessment criteria for planning submissions involving tall buildings

#### **3.1 Definition of Tall Buildings**

##### **a. Definition by Height**

Most of these policies include a definition of tall buildings. Some are referenced above. A number consider buildings 18-19m or over (approximately 6 storeys) as tall buildings although some have lower heights. Brighton and Hove has a lower height for its suburbs:

*Within the suburbs, buildings of four storeys and above (assuming a flat roof with no rooftop plant and a height of 13m above ground level) will automatically trigger the need to address the criteria set out within the guidance.*

##### **b. Definition by Datum Height**

Some refer also to datum heights such as Winchester:

*The majority of new development within the site may be limited to a maximum datum height of 52.4m Above Ordnance Datum (AOD), which is the height of the ridgeline of the Woolstaplers' Hall (approximately 15.7m above ground level in its location on the site).*

### **c. Definition by Context**

Many of these policies use the surrounding context for a proposed building as the most important factor in defining heights for tall buildings. This seems a logical approach.

Historic England states:

*The Guidance on Tall Buildings Advice Note published in December 2015 by Historic England states: "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."*

Examples of the policies in considering heights by context:

#### Brighton and Hove

*'Significantly taller buildings are those in excess of 15% taller than mean height of surrounding development within a radius of 100 metres in all directions from the proposed footprint.'*

#### Canterbury

*In assessing a proposed building's 'envelope' (height, width, massing and depth) consideration will be given to its relationship with heritage assets, local topography and the effect on skylines.*

#### Oxford

*The height at which a building is considered to be high will be dependent on its surrounding context and is likely to vary across the city. Even an increase in height of a single storey may constitute a high building that could include consideration of some of this guidance. An understanding of context is critical.*

#### Windsor and Maidenhead

*A tall building is an exceptional development that is significantly higher than the buildings in its surrounding context and that notably breaks the skyline. As such, 'tall building' is a relative term. A building is considered tall in relation to the height of its surroundings, which is called the 'context height'. The context height is the height that an observer would read as the typical or defining height of a particular area.*

*The relationship of height between a tall building and its context can be expressed as a factor of the prevailing context height. This is the context height ratio (CHR), which expresses the degree of height of a building in relation to its context. This provides a measure of the extent to which a building is 'outstanding' on the skyline considering the prevailing height and scale of the existing place.*

*Tall buildings with a height of 1.5 to 2.5 times the context height will be prominent and outstanding features in an area. Thus any building exceeding 1.5 times the context height of the surrounding area (or a minimum of 4 storeys in a 2 storey area) will be defined as a tall building for the purpose of Policy QP3a*

### Worthing

*There is no clear-cut definition of what a tall building is, as any interpretation could be regarded as relative. For instance, a five-storey building might be a tall building in a predominantly two-storey suburban area, but of a common height within Worthing town centre. Furthermore, tall buildings do not only consist of landmark buildings and skyscrapers. Even a relatively low building could be considered 'tall' if it is located on elevated ground, breaks the established skyline, or impinges upon an established backdrop. Thus, tall buildings must be considered in relation to their local context.*

## **3.2 Policy Considerations**

All of these policies provide details of constraints on heights of tall buildings in their town or city. Some allow a degree of flexibility whilst others are quite restrictive of tall buildings as noted below:

### Cambridge

*There are a large number of designated heritage assets within the historic core, including a significant number of highly graded heritage assets of great national importance. Accordingly, the potential impact that a proposal for a tall building have on the significance of those assets will be a critical factor in the consideration of the proposal. For this reason, it is very unlikely that there would be many instances or scope for introducing new tall buildings in or around the historic core.*

### Canterbury

*Accommodating growth will require a relatively high density of development. Tall buildings (over five storeys) are not considered necessary to achieve this and most parts of the District are not considered suitable for tall buildings. High density development does not have to involve building high or disrupting the urban grain. With skill and care it is possible to incorporate large modern uses within the grain of historic places.*

### Windsor and Maidenhead

*Buildings with heights above 2.5 times the context height rise up into the sky and have a more detached relationship with the lower rise context. Such a relationship is only justifiable in places with highly urban and central characteristics where this increased height forms part of the place character, supports intensification and visually marks a place of district-wide importance on the skyline. The only place in the Royal Borough where a building of such increased height may be acceptable is within the town centre of Maidenhead. In the remainder of the Royal Borough, heights of above 2.5 times the context height will not generally be appropriate.*

### **3.3 Assessment Criteria For Planning Submissions Involving Tall Buildings**

Many of the policies set out Assessment Criteria for considering planning applications for tall buildings. They have detailed requirements for planning applications specific to tall building applications. Some of their requirements are relatively demanding because tall buildings are potentially of significance within these towns and cities and may be challenging, controversial and need to be subject of considerable scrutiny if they are to be approved.

Examples:-

#### **Cambridge**

##### ***POLICY 60: TALL BUILDINGS AND THE SKYLINE IN CAMBRIDGE***

*Any proposal for a structure that breaks the existing skyline and/or is significantly taller than the surrounding built form will be considered against the following criteria:*

- a. location, setting and context – applicants should demonstrate through visual assessment or appraisal with supporting accurate visual representations, how the proposals fit within the existing landscape and townscape;*
- b. impact on the historic environment – applicants should demonstrate and quantify the potential harm of proposals to the significance of heritage assets or other sensitive receptors (view of, backdrop and setting), assessed on a site-by-site basis but including impact on key landmarks and viewpoints, as well as from the main streets, bridges and open spaces in the city centre and from the main historic approaches, including road and river, to the historic core. Tall building proposals must ensure that the character or appearance of Cambridge, as a city of spires and towers emerging above the established tree line, remains dominant from relevant viewpoints as set out in Appendix F;*
- c. scale, massing and architectural quality – applicants should demonstrate through the use of scaled drawings, sections, accurate visual representations and models how the proposals will deliver a high quality addition to the Cambridge skyline and clearly demonstrate that there is no adverse impact;*
- d. amenity and microclimate – applicants should demonstrate that there is no adverse impact on neighbouring buildings and open spaces in terms of the diversion of wind, overlooking or overshadowing, and that there is adequate sunlight and daylight within and around the proposals; and*
- e. public realm – applicants should show how the space around tall buildings will be detailed, including how a human scale is created at street level.*

*Further advice on tall buildings and the skyline and the requirements of the assessment criteria for proposals is set out in Appendix F and further guidance is contained in ‘The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)’ published by Historic England in December 2017 (or its successor document).*

#### ***APPENDIX F (as referred to in Policy extract above)***

##### ***ASSESSMENT CRITERIA – OVERVIEW***

*F.25 The assessment criteria outlined on the following pages are intended to help provide a framework for informing a detailed, evidence-based process to help address the policy*

*requirements in Policy 60. The criteria are widely used in similar guidance, policies and strategies across the country and should, if properly understood and applied, provide an objective, factual and realistic portrayal of proposals for tall buildings.*

*F.26 Applicants need to work through the assessment criteria as they consider proposals for buildings that can be considered ‘tall’ and which are likely to impact on the Cambridge skyline. Ultimately, applicants need to submit a document that addresses all of the assessment criteria as part of the design and access statement or heritage impact assessment. As part of any planning application for a new tall building, applicants will be expected to provide a clear justification for building tall within the design and access statement accompanying the application.*

*F.27 Submissions for planning applications involving tall buildings will need to include written and illustrative material which provides the evidence-base and policy justification for the proposed building(s). Planning applications for alterations to existing tall buildings which result in major changes to their external appearance will also need to use the assessment criteria identified in this guidance.*

#### Oxford

*Planning permission will be granted for developments of appropriate height or massing, as demonstrated by the following criteria, all of which should be met:*

- a) design choices regarding height and massing have a clear design rationale and the impacts will be positive; and*
- b) any design choice to design buildings to a height that would impact on character should be fully explained, and regard should be had to the guidance on design of higher buildings set out in the High Buildings Study TAN . In particular, the impacts in terms of the four visual tests of obstruction, impact on the skyline, competition and change of character should be explained; and*
- c) it should be demonstrated how proposals have been designed to have a positive impact through their massing, orientation, the relation of the building to the street, and the potential impact on important views including both in to the historic skyline and out towards Oxford’s green setting .*



# 4 TALL BUILDINGS PRINCIPLES

## 4.1 INTRODUCTION

- 4.1.1 Ten key principles have been identified to guide the approach and design of tall buildings in the Royal Borough.
- 4.1.2 Developers and designers should use the principles and contained guidelines to inform their approach to the location, layout and design of a tall building.
- 4.1.3 Tall Buildings in the Royal Borough should meet all relevant key principles to be considered appropriate. Local authority planners will use these principles when assessing the suitability of a tall building proposal in a planning application.
- 4.1.4 The key principles are explained in more detail on the following pages.

### KEY PRINCIPLES:

**BE PART OF A PLAN-LED, PLACE MAKING APPROACH**

Tall buildings should be part of a comprehensive, plan-led place making approach, be integrated into larger developments and street blocks.

**HAVE A CLEAR PURPOSE**

Tall buildings should have a clear role and purpose to act as a landmark, as part of a cluster or deliver vital infrastructure.

**SUPPORT INTENSIFICATION AND A MIX OF USES**

Tall buildings should contribute to a mix of uses and the intensification of accessible, central areas.

**PROTECT AND ENHANCE HERITAGE ASSETS, PROTECTED LANDSCAPES AND THEIR SETTINGS**

Tall buildings must demonstrate that they minimise or avoid harm to heritage assets and landscapes.

**PRESERVE AND INTEGRATE WITH THE LOCAL TOWNSCAPE**

Tall buildings should respond sensitively to local townscape and character.

**PROTECT AND ENHANCE KEY VIEWS AND THE SKYLINE**

Tall buildings should generally minimise their impact on the skyline and views, and tall building clusters should be limited and confined.

**DELIVER HIGH QUALITY PLACES TO LIVE**

Tall buildings must create an appropriate microclimate, and good indoor and outdoor amenity levels.

**A POSITIVE RESPONSE TO THE STREET SPACE**

Tall buildings should enhance permeability, provide appropriate enclosure, active frontage and quality public realm.

**BE OF THE HIGHEST QUALITY ARCHITECTURAL DESIGN AND APPEARANCE**

Tall buildings must be attractive and clearly articulate the base, shaft and top of the building.

**BE SUSTAINABLE AND INNOVATIVE DEVELOPMENTS**

Tall buildings should be designed to minimise emissions, adapt to climate change and incorporate blue and green infrastructure.

## 4. NATIONAL MODEL DESIGN CODE: PART 2 (2021)

Below is an extract from the National Model Design Code's Guidance Notes on building heights.

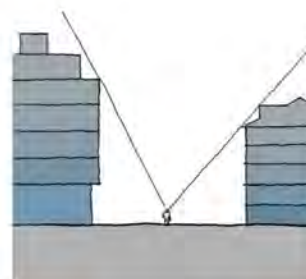
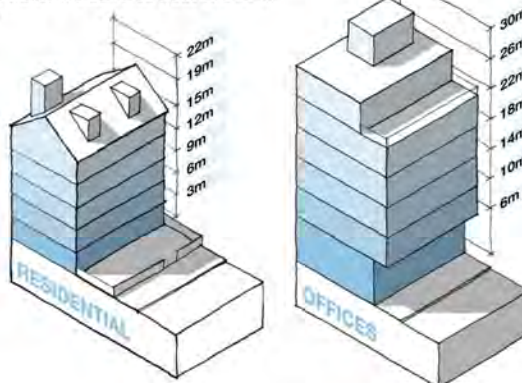
### B.2.iii Height

113. Building heights influence the quality of a place in terms of its identity and the environment for occupiers and users. Consistent building heights, or variation within a relatively narrow range, can help to make an area type feel coherent. Large variations in height can make an area feel dynamic.

114. The identity of an area type may be influenced by building heights, including its overall scale, its skyline, key views and vistas and the relative prominence of landmark buildings. Building height may also have an impact on local environmental conditions in neighbouring properties, amenity spaces and public spaces in terms of daylight, sunlight, overshadowing, wind and micro-climate. The placing of tall buildings needs to maximise user comfort of spaces between buildings by taking into account their impact on orientation and overshadowing of public and private spaces, quality of external spaces at ground level, wind tunnel effect, noise pollution and enable safe dispersion of pollutants.

115. The number of storeys is a common way to estimate the height of residential development in suburban and rural area types. In urban area types and for commercial development, a more precise measure

**42. Heights:** A design code may regulate one or more of the following: eaves or parapet height, roof height and total height. Many building types have projections that rise above the general height of a roof. A code may either allow for projections above a roof height or define a total height including for projections. In both cases the area of any projections may need to be defined in the code.



**43. The Street Section:** The eaves height will contribute to the apparent height of buildings and therefore the character of the street.

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**Eaves or parapet heights:** In simple terms multiplying the storey height by the number of storeys will generate the eaves or parapet height. This is the height of the building's walls excluding the roof. The eaves or parapet height will usually be the apparent height of the building from the street and so determine the cross-section of the street. A code may set out a maximum and possibly a minimum eaves or parapet height for each area type and type of street.

**Measuring height:** It is also important to specify how building height is to be measured. Typically this will be the height above pavement level. An alternative approach is to use AOD (Above Ordnance Datum) measurements. These are likely to be more appropriate in area types with slopes, or where ground levels may be reconfigured.

**Variances:** There may be situations or locations where it is appropriate for a building to be taller than those in its immediate context, to create a local landmark or, in certain area types, a tall building (see overleaf). A design code may define criteria to allow exceptions to height parameters in specified circumstances.

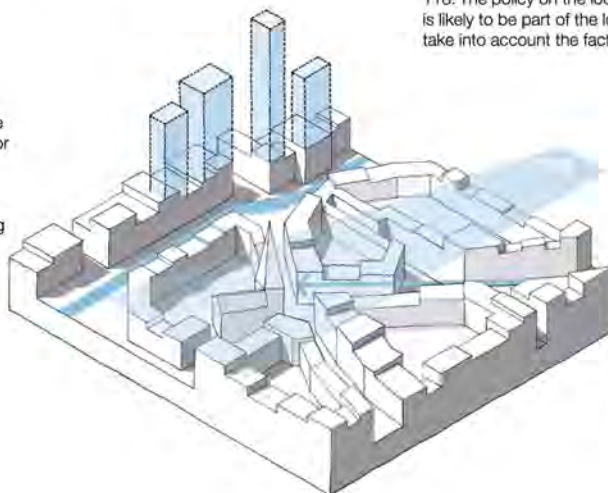
### Tall Buildings

116. Tall buildings can be considered in design codes. It may be appropriate to include criteria for the locations of tall buildings in some area types.

117. A tall building for the purpose of the code would be any structure that exceeded the general height guidance for a particular area type. Tools that can assist with this include:

- Accessibility measures such as distances and travel times to key facilities, including public transport stops or hubs;
- Characterisation studies and design strategies, dealing with issues such as urban form, historic character, building typologies, prevailing sunlight and daylight levels, green infrastructure, amenity space and quality of external spaces at ground level.

118. The policy on the location of tall buildings is likely to be part of the local plan and would take into account the factors in Figure 44.



### 44. Tall Building Principles:

Topography, characterisation studies, heritage assets, local historic character and conservation areas, transport accessibility, identified long views and skylines to be protected, sensitive local views, vistas and gateways.

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