

Tall Buildings
Historic England Advice Note 4
Second Edition: CONSULTATION DRAFT

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Summary

This Historic England Advice Note updates previous advice produced in 2015, based on the English Heritage and CABE guidance from 2007. It seeks to guide people involved in planning for and designing tall buildings so that these may be delivered sustainably through the development plan and development management processes. The advice is for developers, designers, local authorities, neighbourhood forums and other interested parties. It reflects Historic England's experience of the processes of planning for tall buildings and the impacts that an increased number of completed tall buildings are having on the historic environment, individually and cumulatively.

Introduction

The purpose of this Historic England Advice Note is to support everyone involved with the planning and design of tall buildings in implementing historic environment legislation, the relevant policies in the National Planning Policy Framework (NPPF), and the related guidance given in the Planning Practice Guidance (PPG). In addition to these documents, this advice should be read in conjunction with the relevant [Good Practice Advice in Planning and Historic England Advice Notes](#). Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.

Historic England is the government's expert adviser on the historic environment. We recognise the importance of managing change in the built environment to continually improve its quality. The planning process in England requires Historic England to be consulted on the development of local and neighbourhood plans and in relation to certain proposals that affect the historic environment.¹ Our advice focuses on how to

¹ For further details on when to consult or notify Historic England about a planning application see: <https://historicengland.org.uk/content/docs/planning/proposals-for-development-management/>.

conserve the significance of heritage assets and pursue sustainable place-making to ensure that the character of our historic towns, cities and places is sustained and enhanced for future generations.

Historic England strongly encourages early and continued engagement between developers, planners, specialists in conservation and urban design, and local communities and civic groups in the preparation of plans and relevant development proposals. This is especially important for tall building proposals given their greater potential impacts. Such engagement reduces risks to developers and communities, and increases the likelihood of achieving successful sustainable development.

1 Tall Buildings and their impacts

1.1 Towns and cities evolve, as do their skylines. Individually, or in groups, tall buildings can dramatically affect the image, character and identity of towns and cities as a whole, and once they are built will do so for a long time. Some of the most important buildings in our historic towns and cities are, or were when they were built, the tallest. Be they church towers, town halls or industrial structures, such as chimneys, these buildings often remain prominent local landmarks, informing the sense of place. Although more modern tall buildings are not universally admired, some of the finest post-war examples are now listed in recognition of their special quality of design or use of new technology. In the right place well-designed tall buildings can make a positive contribution to urban life.

1.2 However, a tall building, by virtue of its height, bulk and widespread visibility, can seriously harm the qualities that people value about a place if it is not in the right place and not well designed. There will be some locations where the existing qualities of a place are so distinctive or sensitive that new tall buildings will cause harm regardless of the perceived quality of the design.

1.3 One of the principal failings in the location and design of certain tall buildings has been a lack of understanding of the nature of the area around them, and the impact they would have on heritage assets and historic character of places: the very things that make places distinctive and that people cherish. There have been many examples of tall buildings that have had a lasting adverse impact due to their unsuitable locations, poor design, construction and management. Modern construction techniques enable taller buildings than ever before, with greater impacts on surrounding areas, and so it is especially important that impacts are fully considered.

1.4 What might be considered a tall building will vary according to the prevailing character 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 where the general building heights are taller, it may not. Similarly a building in a hill-top location, or on the crest of a ridge of higher ground, may gain prominence and an appearance of height. Height may also be experienced differently depending on the location of the viewer. Definitions of tall buildings that are based on evidence assessing the local context help when developing planning policy and are more likely to encourage appropriate developments.

Examples of this context-led approach to defining a tall building can be seen in Cambridge and Oxford. In Cambridge, the City Council defines a tall building as any building 'that breaks the existing skyline and/or is significantly taller than the surrounding built form'. In practice this means buildings above 6 storeys in the historic core are subject to tall buildings policies, as buildings in this part of the City tend to range in height from 3-5 storeys. In the suburbs, which are characterised by lower buildings, a lower threshold is applied, with buildings over 4 storeys subject to the tall buildings and skyline policy.

Similarly, in Oxford, a city famed since the 19th century for its skyline of dreaming spires, and where much of the historic character is medieval, the Council traditionally defined anything above the parapet height (18.2m) of the Grade II listed Carfax tower as tall. Locally-specific technical advice has been developed to support densification while protecting what is important. It notes that 'an understanding of context is critical' as in some locations 'even an increase in height of a single storey may constitute a high building.'

2 National Planning Policy

2.1 The government's objectives for new development are set out in the National Planning Policy Framework (NPPF). The Framework seeks to promote sustainable development, in part through the creation of high quality buildings and places, with developments that add to the overall quality of an area, are visually attractive and 'sympathetic to local character and history, including the surrounding built environment and landscape setting'.² New development should make a positive contribution to local character and distinctiveness, and 'poor design that fails to take the opportunities available for improving the character and quality of an area' should be refused.³

2.2 The NPPF has strong policies to protect and enhance the historic environment including the 'great weight' that should be attached to the conservation of designated heritage assets. It recognises that the setting of a heritage asset can contribute to its significance.

2.3 The NPPF also introduces policies to promote the effective and efficient use of land which should be achieved 'while safeguarding and improving the environment', and by taking into account 'the desirability of maintaining an area's prevailing character and setting...and the importance of securing well-designed, attractive and healthy places'.

2.4 The NPPF is clear that new development should be plan-led, and that all policies should be underpinned by relevant and up-to-date evidence. Local authorities need to develop their overall strategy for development, taking into account reasonable alternatives, and basing their approach on proportionate evidence. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, while making provision for the conservation and enhancement of the natural, built and historic environment.⁴

² Paragraph 127

³ Paragraph 130

⁴ Paragraph 20.

2.5 The supporting [Planning Practice Guidance](#) and the accompanying [National Design Guide \(NDG\)](#) also promote the creation of high quality buildings and places. The NDG sets out ten characteristics of good design; and first amongst them is an understanding and response to context:

‘Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones. Some features are physical, including:

- the existing built development, including layout, form, scale, appearance, details, and materials;
- local heritage... and local character...’ (paragraph 40).

2.6 Paragraphs 69 and 70 deal specifically with tall buildings:

‘Well-designed tall buildings play a positive urban design role in the built form. They act as landmarks, emphasising important places and making a positive contribution to views and the skyline’ (paragraph 69).

and

‘Proposals for tall buildings (and other buildings with a significantly larger scale or bulk than their surroundings) require special consideration. This includes their location and siting; relationship to context; impact on local character, views and sight lines; composition - how they meet the ground and the sky; and environmental impacts, such as sunlight, daylight, overshadowing and wind. These need to be resolved satisfactorily in relation to the context and local character’ (paragraph 70).

2.7 The NDG will be supplemented by a National Model Design Code. The Code will set a baseline standard of quality and practice across England which local planning authorities will be expected to take into account when developing their own local design codes and guides and when determining planning applications, such as those for tall buildings.

2.8 Thus, the importance of plan-makers developing clear policies that protect and enhance the historic environment, including the settings of designated assets, while promoting high-quality design, responding to local context, is a key planning objective running through from primary legislation to government guidance. The NPPF makes it clear that councils should put in place strategic policies that set out an overall strategy for the pattern, scale and quality of development, whilst making provision for the conservation and enhancement of the natural, built and historic environment.

3 Tall Buildings and the Development Plan

3.1 In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of policies in the development plan.

Benefits of taking a plan-led approach

3.2 Including tall buildings policies in plans promotes transparency and confidence in the sustainable management of development for proposals that could

become contentious with local communities and other stakeholders. Developing clear and well evidenced policies supports planning authorities to:

- a) Identify the role and contribution of tall buildings, where appropriate, as part of an overall place-making strategy
- b) Ensure early public engagement on the principles of development in relation to place, context and design and consideration of the impact on, and contribution to, the aspirations of local communities
- c) Protect designated heritage assets and their settings, where this contributes to their significance, as well as the overall historic character that makes a place distinctive and special
- d) Identify areas that might be, and definitely are not, appropriate for tall buildings in advance of specific proposals, reducing unnecessary, speculative applications in the wrong places
- e) Demonstrate that in selecting areas for tall buildings due consideration has been given to alternative sites or forms of development to meet identified local needs, and to the impacts on land outside the local authority's area
- f) Express the clear expression of spatial scale and design quality requirements for new tall buildings
- g) Highlight opportunities for the removal of past inappropriate developments and their replacement by development of an improved quality and scale.

Evidence base

3.3 As part of plan-making, the assembly of the evidence base provides the opportunity for a more thorough upfront heritage assessment and urban design analysis, which will be tested through the options appraisal, environmental impact assessment, and consultation. This will create a stronger and more realistic policy base, which is beneficial to applicants and local authorities alike in guiding site selection and design. The amount of evidence necessary to support appropriate locations for tall buildings will be proportionate to the nature of the area. Types of evidence needed to support plan-making could include:

- Statements of Heritage Significance
- Conservation Area Appraisals
- Characterisation Studies
- Inter-visibility Studies
- Urban design and townscape analysis
- Master-plans
- Three dimensional (3D) modelling
- Views studies

A Statement of Heritage Significance, reviewing which assets could be affected by tall building development, and then describing what is special about those assets to a level of detail sufficient to assess likely impacts, will underpin any sifting exercise that seeks to identify the potential locations for prominent or tall buildings. Historic England's Advice Note 12: [Statements of Heritage Significance](#) provides a framework to support this analysis. Additional analysis may be required if there are particularly sensitive heritage assets that might be affected by potential policies and allocations, such as World Heritage Sites where Heritage Impact Assessments complying with the International Council on Monuments and Sites' [Heritage Impact Assessment](#) methodology are likely to be necessary.

3.4 Techniques such as characterisation and building height studies, inter-visibility studies and conservation area appraisals, also help identify areas of increased sensitivity to tall buildings, and can provide evidence to inform guidance or design coding on building heights across a plan area. This can include defining areas where different scales will be expected, as well as supporting local height definitions for tall buildings. Such definitions may vary within the plan area, based on the local character. Studies informing the potential of areas for tall buildings should consider the impacts of any existing tall buildings. This may include the locations of prominent historic buildings, the role they play (either positive or negative) in the surrounding townscape, or the contribution they make to local character, vistas or views.

To support the management of the York Centre Historic Core Conservation Area the City of York Council commissioned a conservation area appraisal to support decision making. The appraisal of York's special local character includes assessments that demonstrate that settings and views, including important views several miles from the city centre, can be sensitive to tall buildings, requiring a broader analysis than might be expected. This illustrates the importance of having evidence and clear published guidance to help guide development proposals. For more details on conservation area appraisals see Historic England's Advice Note 1: [Conservation Area Appraisal, Designation and Management](#).

3.5 Factors to consider when assessing the suitability of land for tall building development include the impact on the overall character in an area of acknowledged high townscape or landscape value (such as a conservation area or within protected views) or more specific impacts to heritage assets and their settings. It will provide certainty in decision making and clarity for would-be developers if areas recognised as having particular heritage sensitivities are clearly identified as inappropriate for tall buildings within the development plan. This would be considered part of a positive strategy for the conservation and enjoyment of the historic environment (NPPF paragraph 185). When identifying areas appropriate or inappropriate for tall buildings, the findings will need to be carefully reasoned and supported by the evidence base.

Urban design framework

3.6 Tall buildings policies may form part of a wider urban design framework. A successful urban design framework will identify the various roles and characters of different areas, including their heritage interest, and thereby enable the conservation of heritage. An urban design framework can:

- a) Identify those elements that create local character and other important features and constraints, including:
 - Natural topography
 - Urban grain
 - Significant views of skylines
 - Scale and height
 - Streetscape and character assessment (including the history of the place which draws out the characteristics that are particularly significant to its identity)

- Materials
 - Landmark and historic buildings and areas and their settings, including backdrops, and important local views
- b) Identify opportunities where prominent or tall buildings might be appropriate, for example by enhancing overall townscape legibility by drawing attention to important urban or transport nodes.
- c) Identify sites where the removal of past mistakes might also achieve an enhancement.

3.7 In areas where significant regeneration is planned, a master-planning process can provide a more detailed urban design framework based on an assessment of options, reconciling various interests and providing clarity. While larger regeneration schemes are likely to have a major impact on their surrounding context, this still needs to be sympathetic to local character and history. Understanding the heritage significance of the area and its surroundings are an important step to take before establishing the overall aspirations of the area, as imposing precise targets on an area before considering its sensitivities can lead to unrealistic expectations.

3.8 Modelling various heights and forms of development to assess their impact on heritage assets and the historic character of places that might be affected (including those beyond the plan boundary) at the plan-making stage can help identify the most appropriate approach to use land most efficiently. In many urban locations the use of 3D digital models can support this process by providing easily understandable images that illustrate likely impacts. Developed by planning authorities, universities, as proprietary software, or architects considering the context for their designs, 3D models are increasingly available for towns and cities across England. Such models are particularly efficient if the user can turn on different layers of data, such as heritage designations or views, and allow scenarios to be built and tested. 3D models can also facilitate the appreciation of dynamic experiences (using walk-through video montages), and allow for the consideration of other environmental effects such as wind, daylight/sunlight or pollution.

Views

3.9 Given the potential visual impacts of tall buildings, tall buildings policies are likely to interact with any policies intended to protect views of particular importance. It is advisable to prepare evidence to support such policies together and to associate them closely within the plan. Evidence describing the value of important views will be an important consideration when considering the suitability of sites for tall buildings, as well as identifying the desirable scale or form that might be adopted to ensure potential development enhances the ability to appreciate views. Historic England's Good Practice in Planning Note 3: [The Setting of Heritage Assets](#) includes more advice on managing views.

Case study: Due to its distinctive topography London benefits from expansive cityscape views. Planning policies have evolved to ensure that the public can appreciate these much-loved prospects, including the London Views Management Framework (LVMF). This includes a variety of tools to protect the ability to appreciate key historic landmarks such as the Westminster World Heritage Site, St Paul's Cathedral and the Tower of London. Historic England's [London's Image and Identity](#) report studied the effectiveness of these policies and why they are deeply important to London's identity. While generally successful in protecting the views of landmark buildings and encouraging development, these policies highlight the need for clear evidence and for rigorous application as part of a joined-up strategic approach to tall buildings.

Development Plan Policies

3.10 To justify policy that proposes tall buildings it will need to be demonstrated that potential impacts on the historic environment have been considered, based on proportionate evidence, and that reasonable alternatives have been taken into consideration to avoid or minimise harm (NPPF paragraph 35). This approach will enable the creation of clear strategic policies, site allocations and development management policies, supported by supplementary planning advice where appropriate.

3.11 Clearly identifying areas and sites where tall buildings would be considered appropriate in principle is likely to be the most effective way of ensuring development is genuinely plan led. This applies particularly to areas within towns and cities where tall buildings are promoted by the planning authority or in places where there is a reasonable expectation that tall building proposals will come forward during the life of the plan. This approach also actively supports the requirement for a positive strategy for the conservation and enjoyment of the historic environment (NPPF paragraph 185).

3.12 In the absence of allocations or areas identified as appropriate for tall buildings development plans, and in places where tall building development is likely, there will need to be criteria to assess speculative proposals, including the sustainable management of the historic environment. As with site-specific policies, criteria based policies require proportionate evidence to justify the approach taken (NPPF paragraph 31).

3.13 These site-specific or criteria based policies both need to be drawn up through effective engagement with local communities, statutory consultees such as Historic England, and with proper regard to national planning policies and heritage protection legislation.

3.14 In areas with a regional level plan, local planning authorities will need to take into account strategic level policies relating to tall buildings and the management of strategic views, for example in the London Plan (2020 (tbc) and its future alterations) and its associated supplementary planning guidance including the [London View Management Framework](#), and [London's World Heritage Sites Guidance on Setting](#).

3.15 The existence of a tall building in a particular location will not of itself justify its replacement with a new tall building on the same site or in the same area, as it may

improve the area to replace it with a lower building. Nor will an existing tall building (or buildings) itself justify further tall buildings so as to form a cluster. Clusters can result in individually well-designed tall buildings becoming hidden behind less special ones, and can have greater cumulative visual impacts and possible unexpected impacts on microclimatic conditions. Conversely, when each building in a cluster is designed to stand out visually, the result can be buildings that relate poorly to one another.

3.16 While tall buildings are one model for increasing densities to support the efficient use of land, higher density development can be delivered by alternative built forms that may respond better to existing local character. Historic England's research on [Increasing Residential Density in Historic Environments](#) explores the factors that can contribute to successfully delivering developments which increase residential density in historic environments.

3.17 The NPPF highlights the need for public bodies to consider the duty to cooperate in planning matters (NPPF paragraphs 24-27). Some tall buildings will raise planning issues beyond the boundaries of an individual authority that will require consultation and co-ordination with its neighbours. Opportunities should be sought to work together to produce joint planning policies and strategies where appropriate.

Supplementary Planning Documents

3.18 Given the wide range of issues that tall building development can raise, supplementary planning documents can be important tools to help planning authorities to deliver good design. By providing greater clarity about how the planning authority will interpret policies, more considered proposals are likely to come forward. SPDs, presented graphically, can be particularly useful in communicating local heritage evidence and urban design analysis that has informed the policy development.

4 Making a Planning Application

4.1 The following advice seeks to support designers as they consider a range of issues to help achieve exemplary design for new tall buildings. While good design on its own does not justify a tall building in the wrong location, tall buildings need to set the highest standards in design because of their wide impact and likely longevity. Good design will take the opportunities available for improving the character and quality of an area (NPPF paragraphs 127 and 130).

4.2 Before making a planning application, it is good practice to discuss proposals with the local planning authority and other relevant parties, such as Historic England (NPPF paragraphs 39-46). These consultations will help to:

- a) Identify the zone of visual influence of a proposal, which can then help to understand the character of the areas that may be affected and determine which heritage assets are likely to be affected (this includes considering recognised views and the settings of heritage assets). This will inform the Statement of Heritage Significance and townscape/landscape assessments, and where necessary the environmental impact assessments, which will accompany the planning application.

- b) Guide and improve design. Design Review is one established tool for the assessment of impact at the pre-planning and planning application stages, and can inform the Design and Access Statement. Historic England encourages local authorities and the providers of design review panels to ensure that a broad range of specialists are included on panels, including heritage specialists where it seems likely a proposal will affect heritage assets. The greater the impact, the more detailed and comprehensive the Design and Access Statement needed. The same is true in relation to the Statement of Heritage Significance.
- c) Understand what illustrative material is likely to be needed in terms of the quality, accuracy, clarity and detail, so that the impact of a tall building can be properly and objectively assessed.
- d) Identify additional material that may be required. For example, for applications that may affect a World Heritage Site, a Heritage Impact Assessment will be required, which provides sufficient information to enable assessment of the potential impact on the Outstanding Universal Value of the site, and can be used to inform the scale and design of the building (NPPG 035 Reference ID: 18a-035-20190723).

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

4.4 Applicants may find the good-practice checklist below useful when preparing an application. Where there is an impact on the historic environment, the level of detail should be proportionate to the importance of the affected heritage asset(s) and no more than is sufficient to understand the potential impact of the proposal on their significance. Further information is provided in the paragraphs which follow.

Checklist When Preparing an Application

- a) Design and Access Statement
- b) Statement of Heritage Significance
- c) Assessment of context (local and town or city-wide)
- d) Assessment of cumulative impacts
- e) Environmental Impact Assessment (when required by the local planning authority)
- f) World Heritage Site Heritage Impact Assessment (where proposals might affect the Outstanding Universal Value of a World Heritage Site)
- g) Satisfaction of the following design criteria:
 - Architectural quality
 - Sustainable design and construction
 - Credibility of the design
 - Contribution to public space and facilities

- Consideration of the impact on the local environment (and particularly at ground level)
- Provision of a well-designed inclusive environment
- h) A 3D digital model that can be shared with stakeholders

4.5 A Design and Access Statement should accompany all tall buildings proposals. The principles established within the Design and Access Statement will need to satisfactorily demonstrate high quality in urban design and architecture, as well as respond to and take full account of the impacts on heritage assets. Further details on Statements of Heritage Significance as part of a Design and Access Statement can be found in Historic England's Advice Note 12: [Statements of Heritage Significance](#).

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

- a) Topography
- b) Unique character of the place
- c) Heritage assets and their settings
- d) Height and scale of development (immediate, intermediate and town or city-wide)
- e) Urban grain and streetscape
- f) The impact on the skyline and on the role of existing prominent buildings of importance or merit

And, where relevant:

- g) Open spaces
- h) Rivers and waterways
- i) Important views including prospects and panoramas

4.7 Careful assessment of any cumulative impacts in relation to other existing tall buildings and concurrent proposals will also be needed to fully understand the merits of the proposal. Where a proposal is promoted as part of a cluster, a successful design will have a positive relationship within the cluster, and the altered impact of a cluster itself also needs to be considered.

4.8 3D models and Accurate Visual Representations using photography are recommended to fully assess a proposal's impact on the surrounding area. It is essential to understand the nature of images that are developed. Images produced solely using computer models, or for marketing purposes, may not provide the level of detail or accuracy required to understand what the development would look like once constructed.

4.9 Planning applications for tall buildings often require an Environmental Impact Assessment, which would be expected to address matters in respect of both the proposed building and its cumulative impact, including:

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

Design quality considerations

4.10 Well designed tall buildings provide an inclusive environment, both internally and externally, taking opportunities to offer improved permeability, accessibility and, where appropriate, the opening up or effective closure of views to improve the legibility of the wider townscape. A successful application will have fully addressed a range of design criteria. Delivering architectural quality involves the consideration, amongst other things, of the building's:

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

4.11 Given their likely impact on a wide area, it is important that social and environmental effects are also assessed. Consideration needs to be given to a tall building's contribution to public space and facilities. This applies both internally and externally, including the provision of a mix of uses, especially on the ground floor of tall buildings to allow for active engagement with the street and public realm. Consideration of the impact on the local environment is also important, wind and other microclimatic effects, overshadowing, night-time appearance, light pollution, vehicle movements, the environment and amenity of those in the vicinity of the building, and the impact on the pedestrian experience.

4.12 The long term maintenance and potential for future retrofit are important factors to consider in terms of the safety and appearance of the building, as well as its sustainability and viability. With older tall buildings in need of refurbishment, there will be a range of environmental and fire safety considerations, including the original fire strategy, which will need to be considered as part of the design process. Opportunities to enhance the appearance of unsympathetic tall buildings, reducing negative impacts the building may have on the local area, should also be explored.

5 Assessing Proposals

5.1 Many of the issues associated with determining an application for a tall building proposal are the same as for other applications with heritage implications. Historic England's Good Practice Note 2 provides advice on [Managing Significance in Decision Taking](#). The advice on policy, process and material considerations set out in sections 2, 3 and 4 of this advice note is also of relevance to local planning authorities in their consideration of applications. Some aspects of tall buildings proposals raise particular issues, however, and these are discussed below.

5.2 The government gives considerable importance to the quality of design of all new development and the need to improve the character and quality of an area, supporting the creation of high quality buildings and places. The need to conserve and enhance the historic environment, means the need to achieve high quality design is especially important. This may require a particular set of design responses for new tall buildings, and technical input from a range of specialists including urban

designers and specialist heritage advisers in making assessments and recommendations.

5.3 Where proposals are likely to impact on heritage assets and affect the character and appearance of an area, it is particularly important for decision makers to visit the site in person whenever possible to get a direct understanding of the effects. Technology is becoming increasingly useful in assessing the impacts of proposals, for example virtual reality headsets can be helpful when on site to illustrate more complex development proposals and test the impacts.

5.4 Where relevant, the local planning authority will need to consider the impact on World Heritage Sites. The Statement of Outstanding Universal Value and the World Heritage Site Management Plan are material considerations in the planning process.⁵

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

5.6 Where full planning permission for a tall building is sought, suitable planning conditions and obligations can be used for the detailed design, materials and finishes, and treatment of the public realm, as well as for achieving proportionate public and community benefits. This will help ensure that the required high standard of architectural quality is maintained throughout the process of procurement, detailed design, and construction.

5.7 When considering any proposal that has an adverse impact on a designated heritage asset through development within its setting, 'great weight should be given to the asset's conservation', with any harm requiring a 'clear and convincing justification' (NPPF paragraphs 193 and 194). Where proposals would affect a conservation area, either directly or indirectly, it will be necessary to demonstrate that decision have been taken with special attention paid to the desirability of preserving or enhancing the area's character or appearance.

5.8 In assessing this justification, and in weighing any public benefits offered by a tall building proposal, local planning authorities will need to pay particular regard to the policies in paragraphs 8 and 9 of the NPPF. These state that overarching economic, social and environmental objectives need to be pursued in mutually supportive ways and in ways which contribute to protecting and enhancing the built, natural and historic environment. This assessment may involve the examination of alternative designs or schemes that might be more sustainable in that they deliver public benefits while avoiding harm to the built environment.

5.9 Due to the profound and long term impacts that tall buildings can have on the significance of heritage assets, and the integrity of historic townscapes, it is especially important that the extent and nature of any claimed public benefits are fully and carefully scrutinised by decision makers.

⁵ Further guidance on World Heritage Sites is available within the Planning Practice Guidance (<http://planningguidance.communities.gov.uk>). Planning authorities in London will need to have regard to the London Plan policies for the management of World Heritage Sites and the Supplementary Planning Guidance: London World Heritage Sites Guidance on Settings (2012).