

Tall buildings in national policy and the approach of the Secretary of State



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What are “tall buildings”?

- Undefined in national policy
- Definitions in local plans vary
- In London:

- Extant London Plan

“Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor [$>30\text{m}$ or $>150\text{m}$ in City]”

- Publication London Plan

“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”

What does the NPPF say about tall buildings?

- Nothing! However...
- Requires “good design” (124-132)
- Requires efficient use of land/appropriate densities

“Planning policies and decisions should support development that makes efficient use of land , taking into account the desirability of maintaining an area’s prevailing character and setting..., or of promoting regeneration and change” (122)

“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site... plans should contain policies to optimise the use of land in their area” (123)

NPPF continued

- Sets Green Belt “release conditions”

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it... optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport (137)

- And sets a series of other relevant national policies e.g. the heritage tests in 195-196

NPPF changes consultation

- Supports character assessments, codes and masterplans to ensure land is used efficiently whilst creating “beautiful and sustainable places”
- Express support for design codes in Chapter 12, and a requirement to give “*significant weight*” to development reflects local and national design guidance and/or “*outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings*”

PPG on design

- Again no direct guidance on tall buildings
- Indicates that policies should be based on “appropriate evidence of the defining characteristics of the area” including its “townscape character”
- Refers to the National Design Guide (as a tool for assessing and improving design quality) and the benefits of design codes

National Design Guide (2021)

“70 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.

71 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.”

Design codes

- National Model Design Code (consultation)

“Tall buildings: In many areas codes will need to make provision for taller buildings. Some city area types may include no limit on height. However, in most area types codes can either indicate zones where taller buildings can be considered or indicate the circumstances where exceptions to the height coding might be considered”

Guidance Notes for Design Codes

“115. 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.

116. 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 and amenity space.*

117. 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 53.”

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.”

Other guidance?



Historic England

Tall Buildings

Historic England Advice Note 4



Secretary of State's approach: overview

- Call in and recovery (and holding directions)
- Approach on determinations
 - Importance of heritage impacts
 - Internal design advice
 - Politics?
- Plan directions – see next talk!

Thank you for listening

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