

Greater Cambridge Shared Planning

Appendix C: Policy Background

Final Report
November 2025



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1 Policy and Guidance

1.1 Introduction

1.1.1 This appendix presents national and local policy and guidance and discusses their relevance to tall buildings and this study. The topics covered are as follows:

- National Planning Policy Framework
- National Design Guide and Code
- Historic England Tall Buildings Advice Note
- Cambridge City and South Cambridgeshire District Council policies and guidance (including development plan documents, neighbourhood plans, planning frameworks and other relevant supplementary guidance)

1.2 NPPF

1.2.1 The 2024 National Planning Policy Framework (NPPF) sets out the government's objectives for new development. The NPPF does not have any specific policies on tall buildings, however, it sets out several more general design and planning principles which are relevant to the development of tall buildings.

1.2.2 The NPPF states that planning should be genuinely plan-led and local authorities should provide clear guidance on the quality of development expected within their area. There is a presumption in favour of sustainable development - a concept that promotes healthy urban environments that facilitate social cohesion, and urban design, character-based approach to development and the efficient use of land through developing at optimal densities, which support sustainable travel.

1.2.3 At a national level, the **NPPF (December 2024)** sets out that planning policy should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)



National Planning Policy Framework

(para 135.c). It also establishes that great weight should be given to the conservation of heritage assets, and clear justification would be needed for any harm to or loss of significance of a designated heritage assets from development within its setting, which should be wholly exceptional for assets of the highest significance.

1.3 National Design Guide and Code

1.3.1 The National Design Guide was published in October 2019 and is intended to illustrate how well-designed places that are beautiful, enduring and successful can be achieved in practice.

1.3.2 In respect of tall buildings, the National Design Guide states in paragraphs 69 and 70 that:

‘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.

‘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.’

1.3.3 The National Model Design Code was launched in January 2021 and provides detailed guidance on the production of design codes, guides and policies to promote successful design. It identifies a number of design aspects that are particularly relevant to tall buildings including the form of the building, design of the top and base, materials, public realm interface and microclimate.



1.4 Historic England - Tall Buildings Advice Note 4

1.4.1 Advice Note 4 (2nd edition) promotes a plan led and positive approach to the location and design of tall buildings. It sets out principles for an evidence-based approach which considers alternative locations, decision making informed by understanding of place, character and historic significance and tall building proposals which take account of local context and historic character (Historic England Advice Note 4, section 1.3).

1.4.2 The advice note states that tall buildings can have “wide-ranging impacts” on the historic environment, depending significantly on their height, massing, and location. It reinforces that “tallness” is a relative concept, noting that, for example, “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.” It further advises that “definitions of tall buildings can vary, but in general they should be informed by local character”.

1.4.3 Advice Note 4 states that the scale and form of development should be assessed as part of the formulation of the local plan. It suggests the use of characterisation and tall building studies as well as heritage and urban design assessments to designate appropriate locations and policies for tall buildings, their role in place shaping, and how to minimise potential impacts on local character and significance of heritage assets.

1.4.4 The advice note presents Cambridge Local Plan (2018) as a good-practice example of implementing a criteria-based tall buildings policy that considers the impact on the unique historic environment, skyline and “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”.



Tall Buildings

Historic England Advice Note 4



1.5 Greater Cambridge Policy context

Current local plans

1.5.1 Cambridge City and South Cambridgeshire District Councils operate a joint planning service for the entire Greater Cambridge area. The Councils are currently in the process of developing a joint Greater Cambridge Local Plan. The forthcoming joint Local Plan will include a tall buildings policy for the Greater Cambridge area, which will build upon the existing Cambridge policy and will establish a more robust approach to understanding and assessing taller buildings within South Cambridgeshire.

1.5.2 The area is currently covered by two separate Local Plans which are outlined below.

1.5.3 The South Cambridgeshire Local Plan was adopted in 2018 and does not have a general Tall Buildings Policy as it has not experienced pressure for tall buildings historically.

1.5.4 The Local Plan does set out context-specific height guidelines for two development sites:

- Cambourne West (Policy SS/8) which establishes that “building heights and landscaping will minimise the visibility of the settlement and the secondary school from adjoining roads to the north, west and south.”
- Cambridge Biomedical Campus Extension (Policy E/2) which sets out the requirement to “have building heights which are no higher than those on the adjoining part of the Cambridge Biomedical Campus and which provide a suitable transition in reflection of the site’s edge of settlement location.”

1.5.5 It is also jointly required by Policy TI/6 (SCDCLP) & Policy 37 (CLP) that any development within defined Air Safeguarding Zones will be the subject of consultation with the operator of the airport and the Ministry of Defence and restrictions in building heights may be necessary.

1.5.6 The Cambridge Local Plan was also adopted in 2018 and sets the strategic vision for the city until 2031. The Local Plan has a clear strategic objective to “protect and, where appropriate, enhance

the character and quality of the Cambridge skyline”. The Local Plan also sets out the strategic approach for the city and region “based upon significant growth located on the edges of Cambridge and the delivery of new settlements in South Cambridgeshire” which has been jointly prepared with South Cambridgeshire District Council.

1.5.7 The Local Plan requires that new development respond to its context (Policy 55), including in terms of scale and massing of new buildings and be of high quality that creates a positive impact on their surroundings (Policy 56). It also seeks to ensure the conservation and enhancement of Cambridge’s historic environment” through Policy 61, the protection of local assets (Policy 62) and open spaces (Policy 67).

1.5.8 The Plan has a robust policy on Tall Buildings and the Skyline in Cambridge (Policy 60 and Appendix F) which sets out the criteria that must be met for “any proposal for a structure that breaks the existing skyline and/or is significantly taller than the surrounding built form”.

Appendix F provides additional guidance to support Policy 60; it clarifies that this policy would be automatically triggered for proposals over 6 storeys (19m) within the City Centre (though depending on context could be required for buildings of lesser height) and 4 storeys (13m) within the suburbs. The application of this policy is analysed in greater detail in Section 4.2 Defining Tall Buildings in Greater Cambridge.

1.5.9 The aim of this policy is not to identify locations for tall buildings but to provide a consistent and thorough approach to the assessment of any proposals that can be considered tall against the thresholds provided. In this way, the policy aims to guide development to ensure that the qualities and unique characteristics of the Cambridge skyline are enhanced as the city continues to grow and develop. Appendix F states as the specific overall aims to:

- maintain the character and quality of the Cambridge skyline;
- ensure that tall buildings, as defined in this guidance, which break the

established skyline are well considered and appropriate to their context;

- support only new buildings which are appropriate to their context and contribute positively to both near and distant views; and
- provide clarity to the public and the development industry about the expectations of the Council when considering tall buildings.

1.5.10 The policy specifies the criteria and/or assessments required for any tall building application, including:

1.5.11 Visual assessment or appraisal to demonstrate how the proposals fit within the existing landscape and townscape;

1.5.12 Assessment on the impact to heritage assets and other sensitive receptors, including the impact on the historic character, the skyline character, 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.

1.5.13 Demonstration that “the proposals will deliver a high quality addition to the Cambridge skyline and clearly demonstrate that there is no adverse impact”

1.5.14 Micro-climatic considerations including wind, overlooking, overshadowing, sunlight and daylight assessments

1.5.15 Public realm design demonstrating high-quality and human scale at street level.

1.5.16 This policy and guidance has been largely informed by a series of previous Local Plan policies, Policy 3/13 of the 2006 Cambridge Local Plan, and the Tall Buildings and Skyline Guidance produced by the City Council (see Section 2.5.5).

Area Action Plans/ Development Frameworks

1.5.17 Within Cambridge, there are a number of adopted and emerging Area Action Plans and Development Frameworks that have been prepared to guide development on the edge of city fringe growth sites that have been allocated through previous and the current adopted Local Plan. It is expected that the majority of growth will happen in these locations.

- Cambridge East Area Action Plan which identifies the potential for approximately 10,000 to 12,000 homes on the land at Cambridge airport, north of Cherry Hinton and north of Newmarket Road. This AAP states that this development may include taller buildings given they respect the historic skyline of Cambridge

- North West Cambridge Area Action Plan which will deliver key worker housing for university staff, student housing, new faculty buildings and research facilities, together with a significant amount of private housing and associated community facilities for the University of Cambridge on the land between Maddingley Road and Huntingdon Road.

Supplementary Planning Documents

1.5.18 Within South Cambridgeshire, there are 11 adopted Supplementary Planning Documents which include height guidance for specific villages and new towns. In general, the height guidance in these SPDs typically relates to guiding contextual development that is in keeping with the existing heights and/or below established tree lines to maintain the village character.

1.5.19 Within Cambridge there are 8 adopted Supplementary Planning Documents that include specific height guidance for development sites within the plan area. In general these documents set out an expectation that the height of new buildings should be contextual and respond to key views, skyline, heritage assets and other sensitivities. Many of these also include a potential for taller buildings given they are in alignment with Policy 60: Tall Buildings and the skyline in Cambridge and associated assessment protocol.

Neighbourhood Plans

1.5.20 There are currently seven adopted ('Made') Neighbourhood Plans within Greater Cambridge. There are a further fifteen Neighbourhood Planning areas that have been designated and are in the process of developing and/or adopting their plans.

1.5.21 Most of the adopted Neighbourhood Plans include height guidance, which in general guide heights to respond to the existing characteristics of the neighbourhood in relation to roof lines, height, scale and massing.



WATERBEACH
NEIGHBOURHOOD DEVELOPMENT PLAN
2020 TO 2031
MADE PLAN
MARCH 2022



1



1.6 Review of Former Greater Cambridge Tall Building Policy

Cambridge Planning Proposals: A report to Cambridgeshire County Council, 1950

1.6.1 Tall buildings have been a topic of interest, concern and debate in Cambridge for many years. One of the first important written works on the subject was “Cambridge Planning Proposals: A report to Cambridgeshire County Council” by William Holford and Myles Wright (1950). This publication suggested that building height limits be imposed near the centre of Cambridge with a maximum height limit of 55 feet (approximately 17m).

Dreaming Spires and Teeming Towers: The Character of Cambridge, 1963

1.6.2 The second important written work on the subject was “Dreaming Spires and Teeming Towers: The Character of Cambridge” by Thomas Sharp (1963). This report was published as a guide for developers in Cambridge. It examined the character and scale of the city centre and advocated for caution with all building proposals in the city centre.

Cones of View Plan (1996)

1.6.3 Cones of view that were considered important were identified in the 1996 Local Plan and were “regarded so important to the character of Cambridge to be regarded as Defining Character.” (Cambridge Landscape Character Assessment, 2003)

Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)

1.6.4 Policy 3/13 of the Cambridge Local Plan (2006), established that “New buildings which are significantly taller than their neighbours and/or rooftop plant or other features on existing buildings, will only be permitted if it can be demonstrated that they will not detract from: a. Local residential amenity; b. Ancient monuments and their settings; c. Listed Buildings and their settings; d. Conservation Areas and their settings; e. Historic landscapes and their settings; and f. Key vistas, the skyline and views within, over and from outside the City”.

Public Debates, 2009 & 2010

1.6.5 In September 2009 and March 2010, two consultation events were held jointly with Cambridge City council to debate the role of tall buildings in the city. These events “revealed a range of views on the potential benefits and drawbacks of tall buildings and their impact on the Cambridge skyline. During these events, it was generally concluded that a ‘tall building’ is a relative term”. There was general consensus that “a more proactive “strategy” was needed in order to avoid the potential for a piecemeal approach to the location of tall buildings across the City” with the intention of “preserving the special character of Cambridge” rather than promoting tall buildings. It was felt that a zoning-based approach could be detrimental to this intent as it could target areas for excessive development. (Cambridge Skyline Guidance, 2012).

Cambridge Skyline Guidance, 2012

1.6.6 The Cambridge Skyline Guidance document was published in 2012 to provide guidance on Policy 3/13 of the Cambridge Local Plan (2006). The guidance acknowledged that ‘tall’ is relative to the context. The guidance did not set out a tall building or skyline strategy, but rather was ‘intended to provide an understanding of the skyline and then provide a robust set of criteria to assess applications with a view to preserving the special character of Cambridge.’

1.6.7 The guidance document established height thresholds, above which the application would automatically trigger the need to address the tall building criteria within the planning application. Within the historic core, this threshold was set at six-storey or above (19m above ground level); within the suburbs this was set at four-storey or above (13m above ground level).

1.6.8 The guidance also set out assessment criteria that must be applied by any tall building application. Prior to this guidance, the Council did not have any guidance beyond Policy 3/13 to address tall building applications.

1.6.9 This Policy and associated guidance document have directly influenced the current Local Plan Policy 60 and Appendix F guidance.

1.7 Existing evidence studies

1.7.1 This section explores a variety of different approaches to guiding tall buildings. In general, there are a variety of typical ways in which tall buildings are controlled in Local Plan policy and supplementary guidance. These approaches are often used in tandem to provide a more robust and holistic approach to guiding tall buildings development.

Defining Tall Buildings

1.7.2 Tall buildings are often either identified by the:

- i) relative definition of ‘tallness’ in relation to the surrounding character and context; and/or
- ii) establishment of minimum threshold heights, over which the tall building policy requirements are automatically triggered.

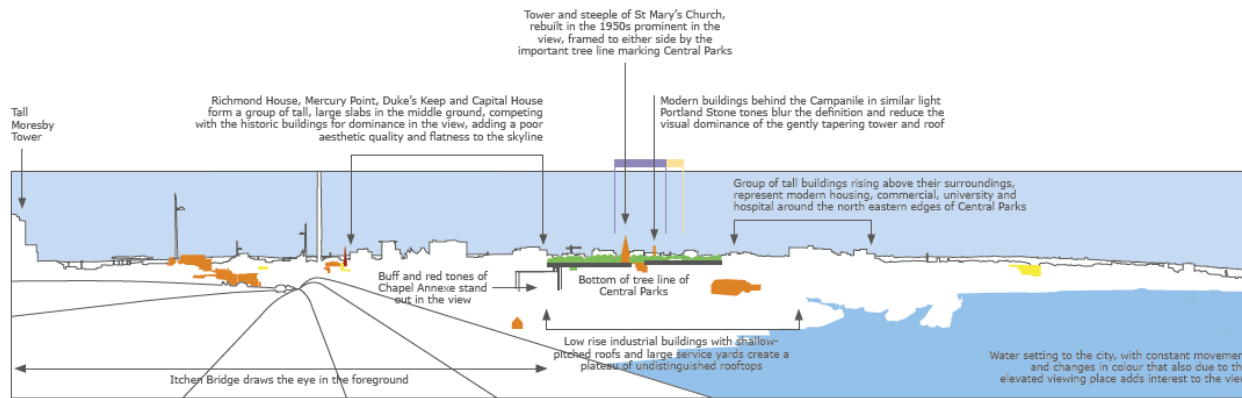
1.7.3 These approaches can be used successfully either independently or together to establish what is a tall building.

1.7.4 For instance, the Royal Borough of Windsor and Maidenhead policy and the draft SPD use a relative definition of tall buildings as anything 1.5x above the defined context height. This approach provides a context specific understanding of what will be perceived as ‘tall’ in differing contexts.

1.7.5 Oxford uses ‘indicative threshold heights’, which provides only an “indication of heights at which high building proposals

are likely to start to change the character and composition” These are used as a reference for consideration but are not used to automatically trigger tall building policy requirements.

1.7.6 Meanwhile, “Bristol City Council requires that buildings over 27m (approximately 9 floors) automatically trigger the need for applicants to address the assessment criteria set out within their Tall Building Supplementary Planning Document (SPD). The SPD also notes that buildings between six to nine storeys located within the City centre would be addressed on a case-by-case basis.” This approach is very similar to the current Cambridge approach.



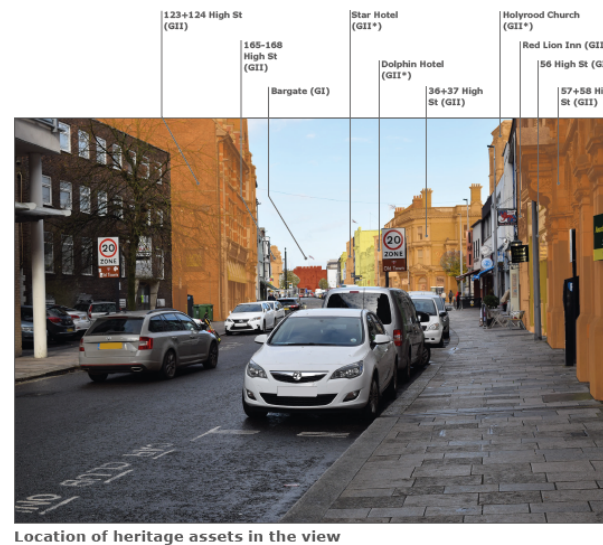
Sensitivities-based approach

1.7.7 A sensitivities-based approach can be beneficial in instances where there are existing sensitivities that must or should be protected and/or enhanced by tall buildings. Often, these are formed around sensitive features of the place such as heritage assets, views, vistas, skyline features or existing residential uses. When this approach is used in isolation, the effect can be a protectionist approach to tall buildings that does not holistically guide tall building development.

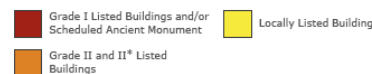
1.7.8 For instance, this type of approach was used for the Southampton Study (2017) which utilising a detailed approach of identifying view cones and heritage assets that are 'Highly Sensitive' and 'Sensitive' to tall buildings and setting out sensitivity assessments that should be carried out for tall building applications.



Existing View



Location of heritage assets in the view



Extract from the Southampton Study, that is based on a sensitivity based approach

Criteria-based approach

1.7.9 A criteria-based approach to planning for tall buildings establishes criteria that can be promoting factors for tall buildings and should be met by tall building applications, such as proximity and access to public transport, the role of the site in the place hierarchy, and the alignment with local policy on growth and regeneration areas. A criteria-based approach is often used in tandem with a sensitivity-based approach to ensure a balanced consideration of tall buildings impacts.

1.7.10 For instance, the draft Liverpool Tall Buildings SPD establishes theoretical areas that promote tall buildings and sets out four 'appropriate tests' to determine if the proposal meets the criteria to support a tall building. These criteria are:

- 1 A tall building should have a clear purpose and role in directly supporting regeneration and legibility;
- 2 The height of a tall building should be proportionate to the role or function of a place within the urban hierarchy;

- 3 The tall building is situated in and positively contributes to an existing or emerging character that can successfully assimilate the building with its mass and activities; and,
- 4 The impacts of the tall building on sensitive aspects in the city have been fully considered, tested, alternatives explored and appropriately mitigated.

5 POTENTIAL LOCATIONS AND TESTS FOR TALL BUILDINGS

5.1 THEORETICAL AREAS FOR TALL BUILDINGS

5.1.1 Local Plan Policy UD6 on Tall Buildings states that "Proposals will be supported where it can be fully demonstrated via a planning application that these positive benefits will be delivered in terms of the social, economic and environmental sustainability and regeneration of the City."

AREAS OF SEARCH

5.1.2 Figure 5.1 identifies three specific land use categories within Liverpool that potentially could accommodate tall buildings based on their theoretical ability to deliver social, economic, and environmental sustainability, and regeneration. In practice these are mixed use areas, the commercial centre, retail centres. These are the types of areas that in theory have the ability to assimilate tall buildings and have the potential to gain wider benefits from their social, economic, environmental and regenerative role. For the purposes of this study, these areas are called 'Areas of Search', and the rationale for including them is described below in more detail.

MIXED USE AREAS

5.1.3 In these areas a mix of different uses is encouraged; Local Plan Policy EC6 'Mixed Use Areas and Sites for Various Types of Development' promotes development which can make a significant

contribution to the regeneration of the local economy, providing enhanced employment prospects and opportunities for environmental improvement. By their nature mixed-use areas have greater activity levels and a sense of urbanity, and are more likely to assimilate tall buildings as part of their character. A tall building in a mixed use area could contribute to place making, enhance legibility by marking a special place, or contribute to intensification and increased densities to support vitality and regeneration.

THE CITY'S MAIN OFFICE AREA

5.1.4 This is the commercial heart of Liverpool. Tall buildings here could help deliver (directly or indirectly) more Grade A floor space (Local Plan Policies CC1 & CC1a), support the area's vitality and complement the existing cluster of tall buildings.

DESIGNATED LOCAL AND RETAIL CENTRES

5.1.5 Centres are the focus of places and neighbourhoods and provide a vital local retail and service function. As diverse areas with a mix of uses they often assimilate tall buildings of an appropriate scale to the local character. Tall buildings here could help to enhance legibility by marking an important location, help intensify the centre and support local business.

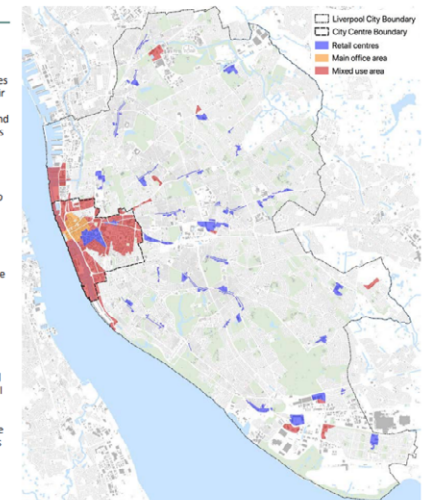


Figure 5.1: Areas of Search
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LIVERPOOL CITY COUNCIL

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OTHER AREAS

5.1.6 Apart from above functional areas tall buildings may also potentially be considered in other areas that have an existing character that can successfully assimilate the scale, height and activities of a tall building.

5.1.7 This, for example, could include a large scale comprehensive regeneration scheme that delivers an urban character with a mix of uses; the intensification of a research, education or health campus; or the transformation of an industrial area into a mixed use employment hub. A tall building in these cases could help to enhance legibility, concentrate activities in central places, be part of a place making approach and contribute to a distinct character.

PUBLIC TRANSPORT ACCESSIBILITY

5.1.8 Tall buildings are an intense form of development that will need to be adequately served by existing or future infrastructures (Local Plan Policy TP1). Tall buildings should generally only be located in areas of high public transport accessibility where they are connected with the wider conurbation by sustainable modes of travel. Areas that are broadly considered to have good accessibility to public transport are those that are within a 800m walkband of the city centre rail and bus stations and Liverpool South Parkway, a 400m walkband around other

rail stations, and along the city's main bus corridors.

5.1.9 Figure 5.2 shows areas with good or very good public transport accessibility overlaid over Areas of Search that potentially could accommodate tall buildings. The majority of Liverpool city centre is within walking distance of one or more of the main public transport nodes. Many of the outer Areas of Search are also accessible via bus routes and local rail connections. However, some Areas of Search are currently not highly accessible, which could affect their ability to support tall buildings.

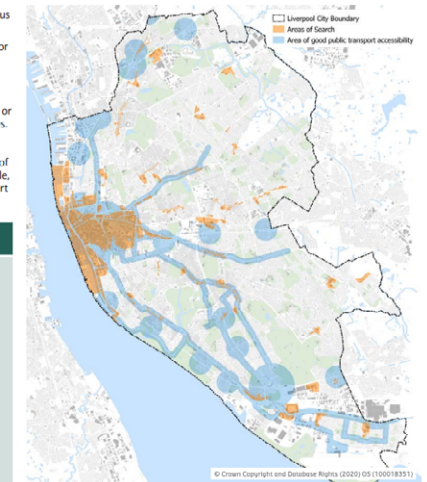


Figure 5.2: Areas of Search & Transport Accessibility
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TALL BUILDINGS SUPPLEMENTARY PLANNING DOCUMENT (CONSULTATION DRAFT)

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Extract from the draft Liverpool Tall Buildings SPD, that establishes broad potential areas where tall buildings may be appropriate, and then applies a criteria based approach

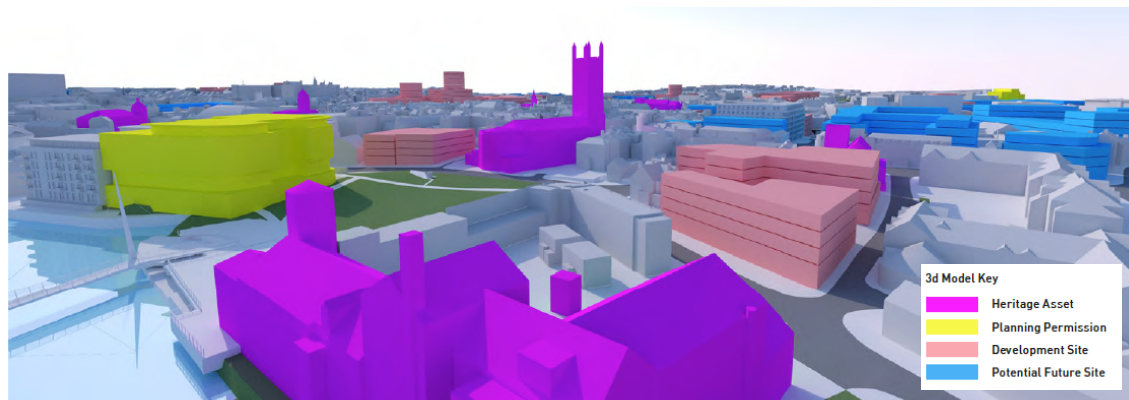


Figure 9.4: 3D Model - Historic City Centre Aerial View

9.3 TALL BUILDINGS

Following the sifting approach outlined in Chapter 8, tall buildings were tested in a 3D model of Derby city centre using simple massing forms. This allowed the consultant team to assess the likely impact or benefit of tall buildings on heritage assets, key views and character areas. The outcome of this process is a set of recommendations on the potential locations and height of tall buildings in Derby from an urban design and heritage conservation perspective, taking into account the need for economic growth.

Figure 9.2 illustrates the tall buildings recommendations. There is potential for four tall buildings clusters and 13 tall buildings of varying scales at particular locations in the city. These are discussed in detail in the context of their respective character areas in Section 9.4.

These recommendations include substantial scope for regeneration in the north of the city centre, which could potentially include “large buildings” (less than 2x context height) but not tall buildings.

Tall buildings and clusters must satisfy all design guidance set out in this chapter and Chapter 10.

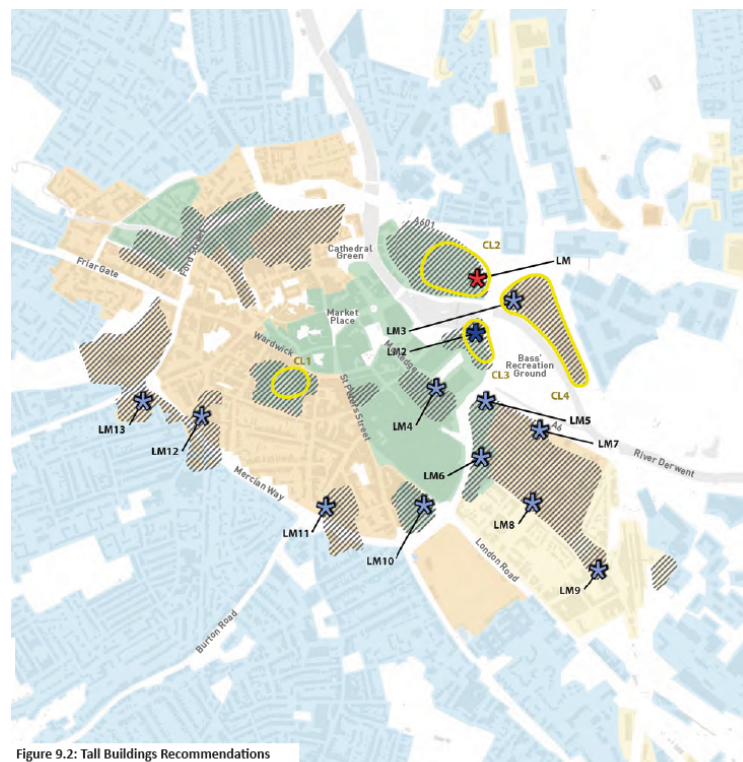


Figure 9.2: Tall Buildings Recommendations

Extract from the Derby Tall Buildings Study, that identifies specific locations / clusters for tall buildings and provides site specific recommendations and tests

Site specific recommendations

1.7.11 Some tall building policies and guidance develops on the sensitivities and criteria-based approaches to establish site specific recommendations on building height and tall buildings. This provides a proactive approach to guiding development of tall buildings in strategic locations where they can contribute to and enhance the place.

1.7.12 The Derby Tall Buildings Study (which was produced as an evidence base for a tall buildings policy in the emerging Local Plan) sets out recommendations for general heights on “large sites or areas that have potential to increase their general building height through comprehensive development.” The study also makes site specific recommendations “for locations in Derby that could accommodate tall buildings and clusters of tall buildings.”

Tall building design criteria

1.7.13 Some policies and guidance on tall buildings also establish design criteria that should be adhered to for tall building applications. This can be another effective way of guiding high-quality development of tall buildings.

1.7.14 For example, Oxford TAN7 on 'High Buildings' seeks "to take a more nuanced and responsive approach to the consideration of the impact of high buildings, encouraging innovative and imaginative design that enhances the city's environment and built fabric and promotes and delivers positive benefits". The guidance establishes "a set of overarching criteria against which high buildings should be considered" including but not limited to design quality, silhouette, materiality, and public realm.

Extract from the Oxford TAN7 that set specific design principles for tall buildings



