Introduction
The purpose of this note is to provide a concise overview of the methodology used to develop policy DM26(1), within the Managing Development DPD (2012) proposed submission version, regarding acceptable building heights for development in the absence of more detailed guidance (e.g. masterplans and/or a future SPD).

Local adopted policy context
The Core Strategy (2010) Spatial Policy 10(5) provides strategic guidance for the location of tall buildings. This guides tall buildings to Canary Wharf and Aldgate as these locations are part of existing economic clusters, capable of accommodating large floor-plate offices and have good levels of accessibility.

The policy goes on to state that further guidance for tall buildings will be provided within the Sites and Placemaking DPD and Development Management DPD. These two documents have been combined to form the Managing Development DPD which provides guidance for building heights in policy DM26 and individual site allocations.

Developing policy approaches
The Development Management DPD Engagement Document (2011) provided three potential options (not mutually exclusive) for the development of a policy on building heights:

- A criteria based approach (similar to that of the Interim Planning Guidance Core Strategy and Development Control Policies document (2007))
- A spatial approach giving guidance for heights across the borough
- A more concise spatial approach giving guidance for heights aligned to the borough’s town centre hierarchy

Consultation and engagement feedback
The feedback from the comments on the engagement document is summarised in the table below (MD DPD Consultation Report, 2011):

<table>
<thead>
<tr>
<th>Key issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixed views were received on setting of building heights. Some views were that rigid definitions of tall buildings would not be supported but should be considered on a site by site basis. Others suggested that policy should be developed to enable an assessment of the individual circumstances of a site.</td>
</tr>
<tr>
<td>Tall buildings will be appropriate in major economic hubs, though consideration to the effect on surrounding areas and the effect on the resident population should be made.</td>
</tr>
<tr>
<td>It was requested that expansion on acceptability of redevelopment of existing tall buildings is made, particularly where the Council no longer considers these locations to be acceptable for tall buildings.</td>
</tr>
</tbody>
</table>

This feedback suggests that a flexible approach should be utilised with spatial guidance for heights aligned to economic centres within the Central Activities Zone, Preferred Office Locations, the Major Centre and Activity Areas.

Developing the policy
In developing the policy for the proposed submission version of the MD DPD the Council took into account the consultation and engagement feedback, existing evidence base as well as undertaking further internal analysis and discussions with English Heritage.

Existing evidence base

LBTH Urban Structure and Characterisation Study (2009)
This provides three recommendations relating to buildings heights:
19. Use and locate strategic landmarks in urban centres, major nodes and/or along primary paths to reinforce the perception or centre an edge. Strategic landmarks should complement each other and not fight for visual dominance.

29. Reinforce nodes to improve their role as meeting places. This can be done by:
   - Using built form to highlight these nodes
   - Concentrating activities at these nodes
   - Ensuring a high level of public relevance of buildings and activities that frame the nodes.

33. Direct building heights to increase gradually from the edge to the centre (town centre) of a neighbourhood (place). The scale of the increase will differ from place to place. It might mean three storeys increasing to seven in one centre (town centre), and be higher of lower than this in another.

This provides urban design-led guidance for policy development with regard to building heights:

3.6.1 Landmarks - Show the way
High-rise buildings can be used to emphasise key locations – rising above areas with a more uniform profile – though their potential benefits have to be weighed against possible negative impacts. In strong market conditions, cluster tall buildings in central locations, rather than allowing their siting to be decided by arbitrary market decisions. The best tall buildings attend to the human scale at the bottom, and locate the most visible compositional elements at the top.

5.3.1 Building Height - The big picture
Tall buildings have a positive role to play in signifying locations of civic commercial or visual importance, or focal points of urban activity such as town centres or transport junctions. However, this has to be weighed against the possible negative impacts on microclimate (such as wind funnels or too much shade), environmental performance of nearby buildings and amount of active frontage (the risk of fewer entrances and a distanced relationship between occupants and the street).

For many urban situations, medium-rise buildings provide an optimum form, because of their ability to accommodate a range of uses, (which generally decreases beyond four storeys), the potential for medium-high densities, as well as generally lower energy demands and construction costs. In more suburban situations, where two or three storeys are the norm, it is desirable to place higher buildings in key locations such as on corners, along principal routes, the end of vistas or around parks. Decisions about building height should also be made in relation to creating street-building height ratios creating good enclosure.

Analysis of existing evidence base
This evidence base identifies that taller buildings should be located in town centres (which correlate to the borough’s transport nodes, civic and commercial centres) and along main roads to signify their location and support wayfinding to services and transport hubs. This suggests that a policy approach with a spatial element would be beneficial to managing building heights in Tower Hamlets.

This should sit alongside the criteria based approach to enable the Council to determine applications for taller buildings on a site by site basis, enabling development to demonstrate compliance with policy.

Further analysis
Taking the lead from consultation feedback and discussions with English Heritage, the Council undertook a baseline building heights analysis to help inform how spatial guidance for building heights should be delivered. A map was used to show the existing building heights within the borough (appendix 1) which illustrates a correlation between higher building heights in Canary Wharf and along the City Fringe.

Building heights in Preferred Office Locations
The information used to create the map and additional permitted development information identified the tallest buildings within the borough to be in Canary Wharf (All measurements are taken at Above Ordnance Datum (AOD) (above sea level)): 
<table>
<thead>
<tr>
<th>1 Canada Place</th>
<th>245.8m</th>
</tr>
</thead>
<tbody>
<tr>
<td>Columbus Tower</td>
<td>242m</td>
</tr>
<tr>
<td>Riverside South 1</td>
<td>241.1</td>
</tr>
<tr>
<td>City Pride</td>
<td>215m</td>
</tr>
<tr>
<td>24 Canada Square</td>
<td>210m</td>
</tr>
<tr>
<td>8 Canada Place</td>
<td>210m</td>
</tr>
<tr>
<td>Heron Quays West</td>
<td>204.9m</td>
</tr>
<tr>
<td>1 Church Hill Place</td>
<td>161.5m</td>
</tr>
<tr>
<td>40 Bank Street</td>
<td>142m</td>
</tr>
<tr>
<td>25 Bank Street</td>
<td>140m</td>
</tr>
</tbody>
</table>

This identifies 1 Canada Place (also known as ‘Canary Wharf’ tower) to be 245.8m AOD which is located within the Major Centre and Preferred Office Location. Given the iconic status and significance of 1 Canada Place and that other existing and permitted buildings continue to be lower in height, the Council views 1 Canada Place to set a maximum for building heights in the borough, and specifically Preferred Office Locations.

To ensure 1 Canada Place retains its landmark status figure 9 in DM26 of the Managing Development DPD provides an indication of a maximum height (240m AOD) likely to be acceptable within a Preferred Office Location in the absence of more detailed guidance provided in the MD DPD site allocations chapter or in other guidance. It should be noted that building heights will continue to be subject to the criteria of DM26 and will be dependant on the local context.

Building heights in the Central Activity Zone, Activity Areas and the Major Centre
Town centres generally have a greater intensity of uses and density of development and are better able to sustain impacts from greater building heights (Urban Design Compendium, 2007). Tall buildings also offer the potential to regenerate our town centres and contribute to civic functions and identity.

Following the above recommendations in the Urban Structure and Characterisation Study (2009) and the Urban Design Compendium (2007), the height of buildings should correspond to the town centre hierarchy while responding to the local context and heritage assets. Activity Areas have a role in providing a transitional buffer area between taller buildings in Preferred Office Locations and the lower heights of surrounding areas.

To determine a height likely to be acceptable in the Central Activities Zone, Major Centre and Activity Area, the Council undertook a case study exercise in the Marsh Wall East area where there is the greatest level of interest for tall buildings within the borough. This measures the relative height of the maximum building height within the POL (both at 1 Canada Place and at its boundary) and the adjacent properties outside of the Activity Area to the south east. This provides a theoretical indicative height range of between 119m to 200m in Marsh Wall East. Officers considered this in more detail in relation to the existing context of the Pan Peninsula development at 153m AOD and the range’s midpoint at 160m. This resulted in 150m AOD being viewed to be the most appropriate indicative building height (subject to the criteria stated in policy DM26(2)).

Following this, figure 9 in DM26 of the Managing Development DPD provides an indication of the heights likely to be acceptable within the Central Activities Zone, Major Centre and Activity Area in the absence of other guidance. It should be noted that building heights will continue to be subject to the criteria of DM26 and will be dependant on the local context.

Building heights in other locations
Building heights in other locations outside of Preferred Office Locations, the Major Centre, Central Activities Zone and Activity Areas will be guided by Core Strategy and development management policies, specifically those relating to design and amenity as well as other supplementary guidance.

The policy
The resulting policy presents a hybrid approach, informed by existing evidence, the Marsh Wall East case study and consultation which provides location/spatial specific guidance structured by specific criteria to enable a site-by-site assessment.