

POSITION STATEMENT

Canary Wharf – LBTH Response

In respect of Sessions 3, 5, 6 and 12
DM16, DM22, DM26 and Wood Wharf site allocation

**London Borough of Tower Hamlets
Managing Development DPD
Local Development Framework
11 September 2012**

Canary Wharf – Position Statement

LBTH Response Statement

This statement provides the Council's response to the issues stated within Canary Wharf's Position Statement for the Managing Development DPD Examination in Public. This statement does not seek to repeat information relating to the Council's position as stated elsewhere.

Issue 1

Policy DM16 is unsound because the POL designation does not provide sufficient flexibility in land use terms.

Summary

Policy DM16 POL designation for Canary Wharf should allow for other uses including residential.

Response

Disagree. The adopted Core Strategy SP06(2) states that residential uses are not deemed appropriate within Preferred Office Locations. It does not preclude other uses which would support the designation. Refer to the Core Strategy's glossary, where it defines Preferred Office Locations to be "area(s) with major office development as the focus, with supporting uses such as gyms, hotels, restaurants and retail uses helping to achieve a sustainable office environment." It should also be noted that Core Strategy SP06 sets out appropriate locations for hotels, visitor attractions etc. which includes the borough's Major Centre (Canary Wharf).

With regard to office, the Council has evolved the POL designation at Canary Wharf in accordance and alignment with the London Plan Policy 2.1 (C) which seeks to sustain and enhance the northern area of the Isle of Dogs as a strategically important, globally oriented financial and business services centre. The boundary of the POL has been carefully considered in the context of the London Plan, the Council's (Employment Land Use study (2009) and Spatial Economic Study (2011)) and in response to the character of the area and development activity.

The Council acknowledges that there is a large supply of permitted pipeline office accommodation in Canary Wharf POL and recognises the current economic downturn since 2008 which has affected demand and the occupancy levels for B1 office let space within the area. However the Council's MD DPD Plan requires taking a longer term strategic view over this plan making period to 2025 anticipating the changeable economic cycles which should also allow for both periods of intense growth witnessed in the early part of 2000 and equally stagnation in the current economic period.

Issue 2

Policy DM22 is considered to be unsound as it seeks to set unrealistically low parking standards.

Summary

Canary Wharf Group has made representations on the emerging policy to the effect that,

- proposed standards are unduly restrictive and could render office and residential developments unviable
- evidence fails to consider the impact of lesser reductions
- levels of congestion in the Isle of Dogs is not fully supported by the evidence
- car ownership does not equal car use
- comparator boroughs have taken a different and less restrictive approach

Response

Disagree. LBTH maintain that the guidance in Policy DM22 and the parking standards in Appendix 2 are consistent with the NPPF, London Plan and the Adopted Core strategy, as well as being supported by evidence. The Council have specifically addressed the issues raised, through the LBTH Transport Planning Strategy 2011-2031 (2011), LBTH Parking Stress Study (2011) and LBTH Review of Car and Cycle Parking Standards (2011).

With regard to the point that “developers need to be able to offer car parking spaces in new developments to make them attractive and viable to purchasers”, the Council do not believe this is always the case, particularly in areas that are popular, even if PTAL is relatively low. For example, 87 private units in “The Arc” development at Prebend Street, N1 has no car parking for purchasers (who will also be barred from applying for on-street parking permits). The scheme has a PTAL of 3-4. All the units sold off plan prior to completion.

Issue 3

Policy DM26 is not considered sound as it is not justified and is not effective.

Summary

Canary Wharf Group considers that the indicative height guidance provided in DM26 and Figure 9 is not justified on the basis of evidence and is not fully compliant with the London Plan. The Policy should allow for greater flexibility.

Response

Disagree. The Council views DM26 to provide an appropriate level of guidance to manage building heights across the borough in relation to the town centre hierarchy and through a series of detailed criteria. This approach has been confirmed by the GLA to be in accordance with the London Plan. The Council maintains that the Building Heights Evidence Note forms sufficient evidence to justify DM26 as a development management policy.

LBTH reiterate that the guidance provided in Figure 9 is indicative. It provides an indication of the heights likely to be acceptable in the absence of more detailed guidance. This figure does not preclude development exceeding this height provided that any proposal exceeding those heights demonstrates a strong case in line with the policy DM26(2) criteria. The guidance is provided to balance the requirements of statutory stakeholders such as English Heritage as well as developers, landowners and residents.

Issue 4

Site Allocation 16 is not considered sound as it is not effective.

Summary

The design principles provided for Site Allocation 16: Wood Wharf provide insufficient guidance regarding building heights and are considered inconsistent with policy guidance provided in Policy DM26.

Response

Disagree. LBTH maintain that the guidance provided in Policy DM26 and SA16 are consistent. The Council agreed in Statement of Common Ground 3 to update the text in site allocation 16 – Wood Wharf, bullet point 1 under the design principles, to state, “Complement the tall building cluster in Canary Wharf through appropriate taller building heights while respecting and being informed by the existing character, scale, height, massing, view and urban grain of the surrounding built environment and its dockside location.”