

**POSITION STATEMENT OF  
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COMMERCIAL ESTATES GROUP**

Representor Number: 635838

Overarching Position Statement

**London Borough of Tower Hamlets  
Managing Development DPD  
Local Development Framework**

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## OVERARCHING POSITION STATEMENT

Hertsmere House on behalf of Commercial Estates Group

4<sup>th</sup> September 2012

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### EXECUTIVE SUMMARY AND RESPONSE TO QUESTIONS RAISED BY INSPECTOR

- Hertsmere House has an extant planning permission for a 63 storey mixed use tower (242m).
- Hertsmere House is located in Canary Wharf
- Hertsmere House is located within a short walk of the Canary Wharf Crossrail Station that is currently under construction and due to open in 2017
- The NPPF is supportive of sustainable development and positive growth
- The NPPF encourages local planning authorities to positively seek opportunities to meet the development needs of their area
- The London Plan identifies Canary Wharf as an appropriate location for tall buildings
- The London Plan identifies Canary Wharf as a Major Centre
- Both the NPPF and London Plan make clear that high density residential development is a key component to enhance the vitality and viability of town centres
- The adopted Core Strategy identifies Canary Wharf as an appropriate place for tall buildings

Yet on the Hertsmere House site:

- The emerging DMDPD seeks, through its policy on building heights, to restrict the potential height of any future proposal to 150m, without sound evidence
- The emerging DMDPD seeks to secure, through its Activity Area policy, development that is 'transitional' in scale between the Major Centre and surrounding places.

We consider that:

- This policy approach is inconsistent with that set out in the Core Strategy, London Plan and NPPF and fails to deliver a framework designed to positively meet the development needs of the area.
- On this basis, we consider the policies promoted by the Council to be unsound
- We propose a series of amendments and a site specific policy to resolve this matter

### **What particular part of the document is unsound?**

Policies DM3, DM15, DM22 and DM26 and the Major Centre allocation and the absence of a site specific allocation

### **Which soundness tests does it fail?**

It is unsound because it is not positively prepared, it is not justified, is not effective and is not consistent with the NPPF and London Plan

### **Why does it fail?**

The plan is not based on a clear and coherent strategy which objectively assesses development and infrastructure requirements. The evidence base used in support of the proposed policies is weak and inconsistent and cannot be relied upon as a basis for setting policy as a framework for the determination of a number of major planning applications. The Council appears to be adopting an approach of suggesting that the policies are of an indicative nature which would then be supplemented by further guidance. This is a clear acknowledgement on the part of the council that what is currently proposed is lacking in depth and substance and this is contradictory to the aims and objectives of sections 19 and 20 of the Planning & Compulsory Purchase Act 2004 and the accompanying regulations. Furthermore, the absence of clarity results in the failure of the policy objectives to be effective. Finally, there is clear conflict between the proposed policies and the NPPF and the London Plan.

### **How could the document be made sound?**

By adopting the suggested alterations flagged in the representations referred to at 8.1 and 8.4 of this position statement and adopting the site allocation identified at Appendix 4 and other alterations that the Inspector considered necessary in the light of representations made by others.

### **What is the precise change/wording sought?**

As detailed between paragraphs 7.3 and 7.8 of this position statement.

## **INTRODUCTION**

### **1.0 Qualifications**

1.1 My qualifications are set out in Appendix 1.

### **2.0 Purpose of this Position Statement**

2.1 I have been asked to write this position statement in order to explain the overarching relationship between the representations made by CEG to the various interlinked policies of the emerging Managing Development Plan Document (MDDPD) of the LBTH. I conclude that notwithstanding the amendments sought to each policy to which CEG has made representations that the HH site should also be subject to a specific plan allocation as part of the wider West India Quay area. This approach is consistent with that advocated in our formal representations to the MDDPD dated 9<sup>th</sup> March 2012, is reflected in the fact that the HH site benefits from a policy compliant planning permission for a tall building, and we consider

would respond appropriately to the requirement set out in the NPPF to positively seek opportunities to meet the development needs of their area.

- 2.2 This position statement also addresses representations made by CEG in the context of the proposed Affordable Housing policy at DM3 of the MDDPD.

### **3.0 Outstanding Objections**

- 3.1 CEG have sought to engage with LBTH over an extended period as their broader policies and policies affecting the HH site have developed. Whilst some progress has been made, CEG maintain the following objections:
- A. CEG object to the classification of the HH site within the defined Activity Area (AA) rather than the Major Centre (MC) as illustrated on Fig. 39 (Proposals Map Extract for the Place of Canary Wharf).
  - B. Linked with the above, CEG object to the way that the tall buildings policy is applied in policy DM26 of the MDDPD to sites within Canary Wharf and in particular the way in which subsection 2.b. seeks to make a distinction between sites within the Preferred Office Location (POL) and other parts of Canary Wharf which are expected to provide development of a 'transitory' height. This is simply illogical.
  - C. CEG object to the unnecessary level of protection afforded to B1 land uses at Canary Wharf as set out in DM15 and, in the light of 'A' above where CEG seek the re-inclusion of the HH site within the MC, consider that the marketing tests associated with the loss of employment use should not apply to sites in the MC.
  - D. CEG object to the emerging parking standards proposed for the Isle of Dogs as set out at DM22 and Appendix 2 of the MDDPD at Table A1.
  - E. CEG object to the lack of inclusion of reference to viability within policy DM3 at 3.a.iii which specifies a requirement for a minimum provision of 50 per cent affordable housing in circumstances which LBTH has agreed off-site affordable housing is appropriate.
- 3.2 As stated in opening, CEG consider that these objections can be best resolved through the allocation of a site specific policy for the HH site. The alternative is to amend the proposed boundary of the MC to include the HH site and delete Figure 9.

## **BACKGROUND & CONTEXT**

### **4.0 Material Site History**

- 4.1 A note summarising the material planning history of the site and referencing the permissions issued in 2005 and 2009, including the decision of the Mayor of London to recover the application as an application of strategic importance is set out at Appendix 2.

### **5.0 Background of Policy Evolution**

- 5.1 A note commenting on the key policies of the Core Strategy upon which the MDDPD is founded (SP01, SP06 and SP10) and the evolution of the spatial

geography of each of the policy boundaries with respect to the HH site over time is included at Appendix 3.

## **SUBSTANTIVE POSITION STATEMENT & RECOMMENDATIONS**

### **6.0 The MDDPD Policies**

- 6.1 Policies DM1 and DM26 provide the basis against which CS policies SP01 and SP10 should be considered.
- 6.2 Policy DM1 makes clear that within AA's, a mix of uses will be supported. Policy DM1 requires development to provide a transition between the scale, activity and character of the Major Centre and the surrounding places. As noted above, HH is the only development site within the AA to the north-west of Canary Wharf. It has a planning permission for a 63 storey building that has twice been tested through the development control process. Plans are currently being discussed with officers exploring a successor scheme of a similar scale to the permitted scheme. As drafted, by including HH within the AA, policy DM1 appears to be intended as a barrier to the consideration of a successor scheme on a similar scale.
- 6.3 Inclusion of the HH site within the Major Centre designation in our view better reflects the nature of this part of Canary Wharf as discussed in Mr Stringer's (of Quod) Position Statement and also removes a brake on development by removing the HH site from an area where a transitional scale of development is sought, notwithstanding the extant consent. As discussed in Mr Stewart's (of Peter Stewart Consultancy) Position Statement, this approach will also help to unpick the apparent confusion in policy in terms between land use and scale.
- 6.4 Policy DM26 makes clear that outside of those areas identified in the CS as acceptable for tall buildings, building heights will be considered in accordance with Figures 9 and 10 (as noted above, the text appears not to have caught up with the deletion of Figure 10). On that basis, where tall buildings are promoted in Canary Wharf and Aldgate, Figure 9 need not apply. Yet Canary Wharf and Aldgate are not spatially defined and it is for the reader to determine whether the reference might be made to the economic study area, the MC, the AA or the 'Place'.
- 6.5 Policy DM26 2b notes that within the AA development will need to provide a transition between taller buildings in POL and the lower heights of surrounding areas. As explained above, given that the HH site is the only development site in this zone, the policy appears to ignore the extant planning permission for a 242m building on this site.
- 6.6 A policy approach driving a maximum height of 150m in this location is also inconsistent with the view held by officers in May 2011 when the HH site was located in POL and when a building of up to 240m would have been acceptable. No evidence has been produced to suggest that there has been a change in the way in which townscape potential should be assessed.
- 6.7 Furthermore, the national investment in, construction of and imminent arrival of Crossrail a short walk from the HH site should be capitalised upon and an unnecessarily restrictive policy environment, where no harm would arise from a taller building than emerging policy would allow is also inconsistent with the wider objectives of both the London Plan and NPPF.

## **7.0 Suggested Resolution**

- 7.1 Had this site been left in POL and the MC, a redevelopment of a building of 240m in height which did not provide a 'transitional' scale would have been supported in policy terms on this site. My clients desire to remove the scheme from POL should not also have had the effect of altering the Council's analysis of what might be an appropriate scale of development in this location.
- 7.2 The decisions to remove the HH site from POL and from the MC have left the HH site in the AA. As noted above, the AA is defined in the CS as being a 'transitional' area. This designation is inconsistent with the analysis that has twice supported the grant of planning permission in this location, in sympathy with its sensitive context, for a 242m tall building. As a key development site in Canary Wharf, the HH site should be brought forward and a positive planning framework should be developed to enable this.
- 7.3 **As set out previously in its representations, CEG are of the view that this should be achieved by defining a site allocation around the wider West India Quay area or at the very least the HH site.**
- 7.4 **A suggested site allocation text is included at Appendix 4.**
- 7.5 **CEG believes Figure 9 should be deleted from DM26 and that DM26 2b should be redrafted. CEG think that the MC boundary should be redrawn to include the wider West India Quay area or at the very least the HH site which had previously been included in the MC in earlier drafts of the MDDPD and the inclusion of which was recognised in LBTH's own evidence base documents.**
- 7.6 **Once included within the MC, CEG consider that DM15 should be redrafted to exclude the need for a marketing test for sites within the Major Centre as the retention of the existing structure on site which predates the majority of the Canary Wharf development would be an impediment to regeneration and intensification. Were the Inspector to resist the inclusion of HH within the MC, CEG would suggest instead that the exclusion described above be applied to the loss of all buildings of more than 2500sq m within the wider AA. If the Inspector were to resist such a size threshold, CEG would suggest instead that the existence of an extant planning permission for a site should be taken into account when considering whether a marketing test should apply.**
- 7.7 **Parking policy should be amended to ensure consistency with the CS position and to allow the attributes of each site and proposed development to be taken into account.**
- 7.8 **Affordable Housing policy should be amended to introduce a consistent test of viability.**

## **8.0 Accompanying Position Statements**

- 8.1 The following position statements are to be read in conjunction with this position statement:

### **Major Centre**

The position statement of Barney Stringer of Quod Planning sets out in detail CEG's case for the redrafting of Policy DM1 and Figure 39.

### **Tall Buildings**

The position statement of Peter Stewart of Peter Stewart Consultancy sets out in detail CEG's case for the redrafting of Policy DM26 and deletion of Figure 9 as referenced.

### **Employment**

The position statement of Jeremy Gardener of Jones Lang LaSalle sets out in detail CEG's case for the redrafting of Policy DM15.

### **Parking Standards**

The position statement of Keith Sowerby of Steer Davies Gleave sets out in detail our case for amendments to Table A1 referenced by Policy DM22.

### **Affordable Housing**

- 8.2 It is understood at the time of writing that LBTH have accepted that policy DM3 is unsound as currently drafted and that the policy requirement to provide a minimum of 50% affordable housing where off-site provision is proposed in the absence of reference to viability should be amended accordingly.
- 8.3 LBTH have advised that they therefore propose to amend paragraph 3.8 of the supporting text to add at line 6 after 'overall', '*(subject to viability)*'. Whilst CEG are pleased to acknowledge that LBTH agree the principle of the amendment sought, we consider that its inclusion in the supporting justification rather than in the policy text itself is confusing for the lay reader, creates inconsistency within the policy itself between the policy wording and the supporting justification, and is inconsistent with the approach set out in the adopted Core Strategy at Policy SP02 3.a. where specific text is included to make clear that the affordable housing level required will be subject to viability.
- 8.4 **CEG therefore requests that the words '*(subject to viability)*' are included after the word 'overall' in Policy DM3 3.a.iii. CEG consider that this amendment will make the policy sound.**

## **APPENDICIES**

### **Appendix 1: Qualifications**

- A1.1 My name is Julian Carter. I hold a BA Hons Dip TP in Town Planning. Having graduated in 1995, I qualified as MRTPI in 1997 and have spent the past 15 years in planning consultancy. Whilst I have worked across many different local authority areas, I have worked extensively for clients with land assets in the London Borough of Tower Hamlets (LBTH), and particularly on and around the Isle of Dogs (IoD), since joining my current employer, GVA, in 1999.
- A1.2 I became a Planning Director at GVA in 2005. GVA are a large multi disciplinary property consultancy based London's West End with offices in each region around the country. GVA's clients include Lancer Asset Management (Berkeley Square Estate), Bank of Ireland, Spitalfields Development Group, Advantage West Midlands, Argent Group, Goodman International, St Modwen, Ignis Asset Management and Birmingham City Council. Planning Development and Regeneration is a core discipline within GVA and employs around 150 staff.
- A1.3 Having also advised the previous owner, I have advised Commercial Estates Group (CEG) on Hertsmere House (HH) since their client's acquisition in 2005. I am therefore familiar with the HH site and the wider area in which it sits.



## **Appendix 2: Material Planning History**

- A2.1 Planning Permission and Conservation Area Consent have been granted for the redevelopment of Hertsmere House on two separate occasions: firstly on the 2<sup>nd</sup> March 2005 by LBTH; and secondly (following a committee resolution to refuse against an officer recommendation to grant and a subsequent recovery of the scheme by the Mayor of London), on the 2<sup>nd</sup> December 2009.
- A2.2 As such, the scheme has been tested twice, consultees including English Heritage (who concluded, whilst the building would have a significant impact on local heritage assets, that they could not sustain an objection given that the setting of those assets was already dominated by existing tall buildings), and CABE (who concluded that the scheme would be a distinctive and elegant addition to the skyline at Canary Wharf).
- A2.3 Of significance, it should be noted that the scheme was supported by both elected Mayors to have held office and that the current Mayor's decision to recover the application represented the first occasion on which he used his strategic powers under the Town and Country Planning (Mayor of London) Order 2008. In taking this decision, the Mayor advised that the development would have a 'significant impact on the implementation of the London Plan' and in particular that the proposal would have 'a significant impact on the delivery of the London Plan economic and land use policies for Canary Wharf'; 'a significant impact on London Plan strategic views and would contribute to the expansion of the existing cluster of tall buildings in Canary Wharf'; and 'would contribute towards the delivery of Crossrail, thus improving transport and development capacity in Canary Wharf'. It is clear from the Mayoral decision to recover the application that the HH site is seen to have a strategic significance which we would argue contributes to the case for a site specific allocation.
- A2.4 In approving the scheme, the Mayor concluded:
- 'The proposed building achieves a high quality design that would provide a quantum and mix of uses that is acceptable in local and strategic planning policy terms. The impact on the setting of nearby listed buildings and on the character of the West India Quay conservation area has been assessed, particularly in light of Tower Hamlets planning committee decision, and found acceptable. The impact of the development on the daylight and sunlight to nearby residential properties has also been assessed in light of Tower Hamlets planning committee decision and found to be acceptable. The proposal satisfactorily meets required environmental standards and the transport impact is acceptable, subject to suitable conditions and a section 106 agreement. In assessing this application all other relevant policies and considerations have been taken into account, in particular substantial weight has been attached to the fact that there is an extant permission which establishes the principle of a tall building in this location. The new application takes account of material change in planning policy, such as energy requirements. Planning permission and conservation area consent should be granted for the reasons set out at the beginning of this report in the Reasons for Approval. The details of the decision are set out in the Recommendation with a detailed assessment of the planning issues set out in the Material Planning Considerations.'*

### Appendix 3: Background of Policy Evolution

- A3.1 Following the withdrawal of the emerging Interim Planning Guidance documents intended to replace the 1998 UDP in 2007 and their adoption for development control purposes, LBTH has embarked on the preparation of its LDF.
- A3.2 A Core Strategy (CS) document was adopted in September 2010. Of particular note in the context of CEG's objections before the Examination in Public (EiP) are policies SP01, 'Refocussing on our Town Centres' (Page 37), SP10, 'Creating Distinct and Durable Places' (Page 81), and SP06, 'Delivering Successful Employment Hubs' (Page 62).

#### Policy SP01

- A3.3 Policy SP01 1.b. defines a 'Tower Hamlets Activity Area' (THAA) which should *'provide transitional areas that are complementary, yet different, to the distinct designations of the CAZ and Canary Wharf major town centre. This will be achieved through the promotion of a vibrant mix of uses that are economically competitive, based on a set of principles, defined in the Town Centre Spatial Strategy'*. The policy also defines a single 'Major Centre' where LBTH seek to *'maintain and enhance Canary Wharf as an important major centre in the Borough through, improving its local accessibility and supporting its continued growth'*. This Major Centre allocation is consistent with the Town Centre Network set out on Page 64 of the London Plan (July 2011) which defines Canary Wharf as a Major Centre. In Policy 2.15 of this document, 'Town Centres' proposals should *'sustain and enhance the vitality and viability of the centre; accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations; support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services; be in scale with the centre; promote access by public transport, walking and cycling; promote safety, security and lifetime neighbourhoods; contribute towards an enhanced environment, urban greening, public realm, and links to green infrastructure; and reduce delivery, servicing and road user conflict'*.
- A3.4 The uses which exist and which are being promoted in this part of Canary Wharf are very much consistent with the uses that the London Plan states should be promoted in the Major Centre.
- A3.5 The footnote to Policy SP01 makes reference to Appendix 4 of the adopted CS. This lists the Canary Wharf Activity Area as comprising the places of Canary Wharf, Millwall and Cubitt Town and describes its spatial type as 'Pervasive'. Canary Wharf Major Town Centre comprises the place of Canary Wharf and describes its spatial type as 'Pod (needs to become more integrated however)'. 'Pervasive' and 'Pod' are not defined.
- A3.6 Whilst this does not provide clarification of policy intent, the 2009 Town Centre Spatial Strategy (TCSS) itself sets out the following guidelines for the Activity Area and Major Centre:

*'Create a Canary Wharf Activity Area: An activity area beyond the town centre extending to Riverside South to the west, Billingsgate Market to the north, Wood Wharf to the east and Millennium Quarter to the south (my emphasis). This will enable a more a distinctive approach to new mixed-use*

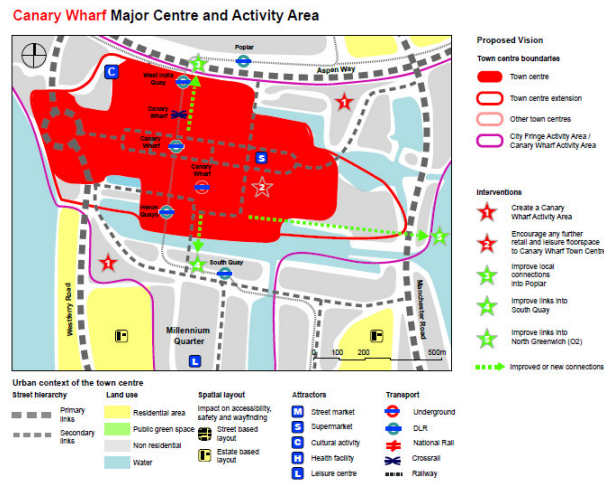
development, particularly focusing on the need to ensure that new development, such as large floorplate offices, residential development, retail and leisure facilities, outside the town centre boundary integrates with the existing Canary Wharf in terms of scale, grain, design and management. This priority can be achieved through policies in the Core Strategy and Proposals Map Development Plan Documents (DPD).'

'Encourage any further retail and leisure floorspace to Canary Wharf town centre: Allocation of additional retail uses will be supported to ensure future growth and strengthening of the centre. This priority can be achieved through the Core Strategy and Development Management DPDs.'

- A3.7 Whilst an evidence rather than policy document, the TCSS suggests a boundary for the THAA and MC. The intended THAA boundary sits beyond the proposed MC boundary. Hertsmeare House is included in the boundary of the MC.

### How are we going to get there?

Figure 13 Canary Wharf Spatial Strategy



### Evolution of the spatial policy geography

- A3.8 The 2010 CS does not itself seek to define the geography to which different policy regimes will apply and the principle of a Major Centre surrounded by an Activity Area was not of concern to CEG at that time, particularly in the light of the TCSS evidence base.
- A3.9 The draft Development Management DPD (DMDPD) issued in May 2011 continued the approach set out in the evidence base document, including HH within the MC boundary.
- A3.10 However, HH was removed from within the MC policy boundary following a first round of consultation culminating in a Cabinet meeting on 7<sup>th</sup> December 2011. The redefinition of the policy boundary appears to have been made without evidence or methodology. CEG made representations to have the HH site removed from the Preferred Office Location (POL) designation during this consultation period. CEG did not seek the HH site's removal from the MC and

do not consider that adequate justification has been provided in support of this decision in the context of the overarching policy framework.

- A3.11 This position was maintained in the Consultation Draft MDDPD (January 2012) and Submission Version MDDPD (May 2012).
- A3.12 This removal of HH from the Major Centre has the effect of rendering it the only 'development site' within the Activity Area to the north-west of Canary Wharf and thus the only site caught by its policies. If the site is to be subject to a 'bespoke' policy framework, again, a site specific allocation might be a more appropriate approach.

### **Policy SP10**

- A3.13 Policy SP10 contains guidance on the development of tall buildings. Policy SP10 indicates that tall buildings will be acceptable at Canary Wharf and at Aldgate. Canary Wharf and Aldgate are identified because they are existing economic clusters and because of their existing built character; because they have a large floorplate office building typology; and because they are areas with high levels of accessibility.
- A3.14 SP10 continues by noting that appropriate sites for tall buildings will be identified in the Sites & Placemaking DPD (SPDPD), since subsumed into the MDDPD, and that all tall buildings, including those outside defined locations will be tested against criteria set out in the DMDPD, also now subsumed into the MDDPD.
- A3.15 Tall buildings are defined in the glossary to the CS as 'Any building that is significantly taller than their surroundings and/or have a significant impact on the skyline'.
- A3.16 Aside from a schematic map, (Figure 37, Page 80), SP10 does not define the geography of Canary Wharf or Aldgate and does not define height thresholds to which tall buildings must conform.

### Evolution of the Policy Geography:

- A3.17 At the time that representations were made to the POL policy, the Draft SPDPD and DMDPD failed to set out a policy basis against which proposals for tall buildings could be assessed. Following initial consultation, the Cabinet Draft MDDPD (December 2011) introduced a policy on building heights. This policy made reference to two figures, 9 and 10. Figure 9 set an Indicative Maximum Height of up to 175m in POL, up to 100m in the CAZ, AA's and MC, and suggested that schemes 'respond to their predominant local context elsewhere'. No evidence base was available to support this policy.
- A3.18 Following repeated requests, a 'Building Heights Note' was issued by LBTH in December 2011. It was suggested that this document provided the evidence base for the approach to building heights. In this regard, the note included a schedule of existing building heights (a schedule that includes the consented Columbus Tower scheme), and an essentially arbitrary exercise undertaken in Marsh Wall East. This evidence document was removed and replaced shortly after publication and now exists as a Version 1 (Void) and Version 2.
- A3.19 In response to the conclusions of the evidence exercise, the January 2012 Consultation Draft DMDPD amended the building height thresholds to 240m in

POL, and 150m in the CAZ, AA's and the MC. Minor changes were made to Figure 9 in the May 2012 document and Figure 10 was deleted (although erroneously still referred to in Policy DM26(1)).

### **Policy SP06**

- A3.20 Policy SP06 introduces the concept of Preferred Office Locations (POL) at Canary Wharf, Bishopsgate, Aldgate and Tower Gateway. These areas are loosely defined at Figure 33.
- A3.21 It should be noted that there is no connection drawn in the CS between building heights and the POL designation.

### Evolution of the Policy Geography

- A3.22 HH was identified as lying within POL in the Draft SPDPD and DMDDPD published in May 2011. CEG sought the removal of HH from POL because that designation prevented the delivery of residential development. No suggestion was made in emerging policy that POL would be tied to height.
- A3.23 HH was removed from POL in the December 2011 Cabinet Draft DMDDPD but as noted above, this was accompanied by the introduction of height thresholds applicable to different spatial areas.

## Appendix 4: Site Specific Allocation

**Address: Hertsmere Road**

**Size: TBC (x ha)**

**PTAL rating: 3 (5/6 with Crossrail)**

**Flood Zone: 2-3**

**London Plan Density Matrix Calculation: Central**

**Existing Uses: First generation office buildings/mixed use development**

Site Allocation: Regeneration of outdated commercial space to improve the vitality of and intensify the West India Quay District in Canary Wharf Major Centre. The site will be required to provide active ground floor uses. Above ground floor, development could bring forward residential or commercial uses where these contribute to the vitality of the Major Centre as a whole.

### **What is the site and surrounding area like?**

The site comprises the listed warehouses along West India Quay, the Marriott hotel, the Cannon Workshops and Hertsmere House. Of these, Hertsmere House offers the most significant opportunity to repair broken linkages and revitalise this quarter of Canary Wharf which is becoming increasingly marginalised as the gravity of Canary Wharf shifts east. The site includes a number of heritage assets and is overlooked by the tall buildings of Canary Wharf to the south.

### **What are the design principles for the site?**

Development should take full advantage of the unique townscape opportunity presented by the dock end location

Development should have regard to the adjacent heritage assets

Links to the north and west should be improved

Any scheme should bring forward active ground floor uses

Above an active base the site will be suitable for residential, commercial or a mix of uses.

### **What are the implementation considerations?**

Development is capable of a start on site once the Crossrail tunnels have been bored in 2013

Development will need to deliver linkages to surrounding areas

Development should accord with any flood mitigation measures stated within the SFRA (2011) and sequential test