

# **POSITION STATEMENT OF BARNEY STRINGER ON BEHALF OF COMMERCIAL ESTATES GROUP**

Representor Number: 635838

In respect of Policy DM1; and Figure 39 Canary Wharf Major  
Centre

## 1. INTRODUCTION

- 1.1 My name is Barney Stringer. I am a director at Quod and have been responsible for the socio-economic assessment of many schemes in the Isle of Dogs. I have 20 years post qualification experience.
- 1.2 This representation outlines the case for the introduction of West India Quay into the Canary Wharf Major Centre boundary, specifically relating to Figure 39 (Page 39) of London Borough of Tower Hamlets' (LBTH) *Managing Development DPD (MD1)* and associated policies, as compared to previous definitions of the Major Centre given in LBTH's *Core Strategy (2010)*, led by a number of LDF Evidence Base Documents including the *Town Centre Spatial Strategy (2009) (EB70)*; *LDF Sites and Placemaking DPD*; and *Town Centre Boundaries and Balance of Uses Review (Page 13), (2012) (EB68)*.
- 1.3 It is recognised that prior to the production of LBTH's *Managing Development DPD (MD1)*, the definition of the Canary Wharf Major Centre included a section of West India Quay until the appearance of a revised boundary at Figure 39 of the *Managing Development DPD (MD1)*.
- 1.4 Figure 1 of the appendix to this document identifies the changes in the Major Centre Boundary and other LBTH spatial definitions for context.

## 2. OVERVIEW OF EIP RESPONSE

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

- 2.1 The *Managing Development DPD (MD1)* mistakenly includes a revised definition of the Canary Wharf Major Centre boundary at Figure 39, the effect of which is to exclude Hertsmere House from the Major Centre, despite it having been previously included in LBTH's *Core Strategy*, and page 13 of the *Managing Development DPD (MD1)* Evidence Base document *Town Centre Boundaries and Balance of Uses Review (EB68)*.

### ***Which soundness test[s] does it fail; and Why does it fail?***

- 2.2 The appearance of a revised boundary at Figure 39 of the *Managing Development DPD (MD1)* fails the following soundness tests:
  - **Not justified (or supported by robust evidence):**
    - *Managing Development DPD (MD1)* changes the Major Centre Boundary based on no evidence. The Core Strategy Evidence Base includes criteria (specifically at Figure 12, Page 31 of *Town Centre Spatial Strategy, 2009*) for the definition of Major Centres, but no distinct guidance as to how boundaries should be drawn and therefore changed. This is a serious omission and as such there is no clear link between evidence and the re-drawn boundary;
    - Core Strategy criteria-based policy has not been applied properly; arbitrary re-drawing of Major Centre boundary. West India Quay meets the criteria for inclusion within the Canary Wharf Major Centre and part of it (Hertsmere House) was included in the Major Centre boundary in the most recent evidence base document, *Town Centre Boundaries and Balance of Uses Review (Page 13) (2012)*;
    - Inconsistent with the Core Strategy - the *Managing Development DPD (2012)* is correct to amend the Preferred Office Location boundary, in line with previously submitted

representations, however it appears at the same time to have mistakenly also altered the Canary Wharf Major Centre boundary to exclude West India Quay;

- Does not take into account changing character of the area with the introduction of forthcoming developments, most notably Crossrail

- **Not consistent with National Policy:**

- NPPF paragraph 161, requires LPAs to use an evidence base to assess the role and function of town centre, with which the change in boundary does not comply
- Major Centre boundary definition is not consistent with NPPF policies to ensure the vitality of town centres (specifically paragraph 23 of the NPPF), sustainable economic development, and the need to prioritise efficient use of land
- The proposed Canary Wharf Major Centre boundary does not reasonably consider increasing development pressures in Canary Wharf, particularly in relation to consented schemes such as the Isle of Dogs Crossrail station, 300m to the east of West India Quay.

***How could the document be made sound; and What is the precise change/wording sought?***

- 2.3 Revise Figure 39 of the *Managing Development DPD* Canary Wharf Major Centre boundary to include West India Quay (the buildings around Hertsmere Road), or at least to re-include previous areas covered within the Core Strategy definition of the Major Centre.

### **3. RESPONSE TO SOUNDNESS TESTS**

- 3.1 Amendments to the Major Centre boundary fail the soundness tests outlined at paragraph 182, page 43 of the NPPF (plans should be positively prepared, justified, effective, and consistent with national policy).

**A. Not justified:**

- 3.2 The *Managing Development DPD* changes the Canary Wharf Major Centre Boundary based on no evidence. The previous boundary was based on the LDF Evidence Base (*Town Centre Spatial Strategy, 2009; LDF Sites and Placemaking DPD; Town Centre Boundaries and Balance of Uses Review, Feb 2012*). The Core Strategy criteria-based policy for definition of Major Centres has not been applied properly, leading to the arbitrary re-drawing of the Major Centre boundary.
- 3.3 The planning purpose and justification for the Canary Wharf Major Centre is identified by Tower Hamlets as being related to the scale of retail, the residential and employment catchment, and the variety of functions (including leisure) in the area.
- 3.4 The following list identifies the identified criteria for the definition of a Major Centre applied by the Core Strategy (a-e below, derived from LBTH's LDF Core Strategy Evidence Base documents listed above – specifically detailed at Figure 12, Page 31 of *Town Centre Spatial Strategy, 2009*). It responds to each in turn to identify how the West India Quay area represents a functional part of the Major Centre (i-v responds to each criteria in turn), which is expanded upon in the following section:

a) *Catchment: Serves a borough-wide catchment and is normally the principal centre in the authority's catchment area*

i. West India Quay is a legitimate part of similar uses to the re-defined Major Centre, it already has a regionally significant museum (Museum of London Docklands) and hotel (Marriott), and food / drink uses.

b) *Residential and Employment Density: 800 metre catchment contains a combined present or future residential and employment density in excess of 40,000 persons.*

ii. Canada Square and almost all of the Canary Wharf Major Centre up to Wood Wharf is within 800m of West India Quay, demonstrating requisite densities, including forthcoming major developments at Isle of Dogs Crossrail Station. Based on analysis of Census data, there were in excess of 53,000 jobs within 800m of West India Quay (much of this is within 500m).

c) *Uses: Contains a mix of comparison and convenience retailing and some leisure & entertainment functions.*

iii. The West India Quay area includes significant leisure uses - a large cinema complex and regionally important museum (the only offer of these uses in the Major Centre), along with active street frontages, bars / restaurants.

Based on a study of 2010 Valuation Office Agency Summary Ratings List data by individual unit and by postcode, the land use at West India Quay is a mixture of office, retail, food and drink (bars and restaurants) and leisure (cinema and museum) and hotel uses.

In this respect, it is similar in character to other areas included within the Major Centre boundary but outside of the Preferred Office Location (POL) definition – Wood Wharf (with consent for mixed use development) and the area to the west of Westferry Circus (residential, hotel, gym, food and drink uses). The Hertsmere House site in particular already has planning consent for similar uses - mixed-use, office and hotel including a 63 storey building (PA/08/02709).

The consent for mixed use, office and hotel uses at the Hertsmere House site has significant implications on the definition of the area in terms of its character, having been granted consent for intensification of use by the Mayor of London in 2009 with the following conclusion (Page 10, Hertsmere House Decision Notice<sup>1</sup>):

*The application proposes an acceptable quantum and mix of uses on an underutilised site in the economic cluster of Canary Wharf, which is located in the northern part of the Isle of Dogs Opportunity Area. This application helps facilitate London's continued attractiveness as an international business location.*

As such, the Council has failed to justify why the Hertsmere House site (which has permission for a 60+ storey building in a range of town centre uses) is a transitional site and not part of the (only) Major Centre in LBTH.

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<sup>1</sup> <http://www.london.gov.uk/priorities/planning/public-hearings/hertsmere>

d) *Size: Has over 50,000 sq metres of retail floorspace and is of sufficient scale for there to be distinct character area or quarters to the centre.*

iv. Character and uses south of the DLR are consistent with the rest of the Major Centre; and significantly different from residential uses to the north and east. Based on VOA data, the Major Centre includes well over 70,000sqm retail in Canary Wharf Shopping Centre (500m) and will expand as a result of Isle of Dogs Crossrail (forthcoming) (300m). West India Quay adds around 5,700sqm of commercial floorspace

e) *Accessibility: There is a high level of accessibility in a local and strategic context. Major centres are accessible for pedestrians and are within walking distance to a transport node and major bus routes. Public Transport Accessibility Level (PTAL) is 6. Major centres are also located upon or close to the strategic road network.*

v. West India Quay is currently in PTAL 3/4, but accessibility will increase due to planned and under construction accessibility improvements (the development of Crossrail) to PTAL 5+. Additionally, the area is within walking distance (10 minutes) of Westferry, West India Quay, Canary Wharf and Heron Quays DLR stations, and Canary Wharf Underground Station; is within 1 mile drive from the A13; and the DLR is an obvious barrier which separates uses (see images in appendix) and adds to the case for a functional geography in terms of land use.

**B. Not consistent with National Policy:**

3.5 The NPPF (paragraph 161) requires LPAs to use an evidence base to assess the role and function of town centres. The revision of the Major Centre boundary has not been based on an evidence base. The criteria used by LBTH to define Major Centres is not relevant / appropriate to inform boundary changes, but only to identify the scale and function of areas.

3.6 Current and consented uses at West India Quay clearly correspond with Town Centre Uses as defined at Page 53 of the NPPF.

3.7 Additionally, Paragraph 23 (Page 7) of the NPPF states that *“policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.”* It then lists things local planning authorities should do in drawing up Local Plans, including:

- *Define a network and hierarchy of centres that is resilient to anticipated future economic changes;*
- *Define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;*
- *Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites; and*
- *Recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.*

- 3.8 The character of the West India Quay area meets the NPPF's requirement for town centres to offer a diverse mix of retail, residential, cultural and leisure uses, and promotes resilience to anticipated future economic changes. Indeed it is the only part of the town centre currently offering the major leisure and cultural uses of the cinema and museum, and its exclusion from the Major Centre is a serious omission (see evidence below on the functional definition of town centres).
- 3.9 Also, the change in definition of the Major Centre boundary does not fully account for anticipated future economic changes (primarily the development of the Crossrail station) as required by Paragraph 23 (Page 7) of the NPPF, including the first bullet point. See evidence below at 'B' on future development.

#### 4. SUPPORTING EVIDENCE

- 4.1 The *Managing Development DPD* does not take into account either:
- **The functional definition of town centres; or**
  - **Reasonable consideration of future development – i.e. the changing character of the area with the introduction of forthcoming developments, most notably Crossrail.**
- A. The functional definition of town centres:**
- 4.2 As noted, the LBTH Core Strategy identifies a set of criteria for the definition of a Major town centre, but does not refer to a guide for identifying the boundaries of the Major Centre. The NPPF presents a number of definitions for competitive town centre environments, based on the functional definition of town centres (Town Centre uses - Page 53 of the NPPF; Measures to ensure the vitality of town centres - paragraph 23, Page 7).
- 4.3 The 'functional geography' of town centres is usually related to their economic gravity. This is related to the number and density and type of jobs, turnover, productivity, and the amount and value of commercial floorspace in typical town centre uses (defined at Page 53 of the NPPF).
- 4.4 A detailed assessment of current floorspace demonstrates that the Major Centre boundary is drawn too tightly and does not include neighbouring areas that also fit the Council's own definition of Major Centre uses in the Core Strategy. A spatial visualisation of the types of floorspace in the Major Centre and surrounding areas is included at Figure 2.
- 4.5 A research project commissioned by the Office of the Deputy Prime Minister, carried out by the Centre for Advanced Spatial Analysis (CASA) and URBED to define consistent statistical areas of town centre activity using government data identifies a much larger spatial functional geography for Canary Wharf and the Isle of Dogs (See Figure 3), inclusive of West India Quay. This is based on detailed spatial study of full-time equivalent (FTE) employment, turnover and floorspace
- 4.6 Using Valuation Office Agency data for floorspace by type by registered postcode, Figure 4 highlights the prevalence of commercial (retail, leisure and food and drink uses) floorspace at West India Quay in quantum comparable to areas inside the revised Major Centre boundary. This is notwithstanding the large proposed quantum of complementary uses at the Isle of Dogs Crossrail Station and other developments (Wood Wharf, Hertsmere House).
- 4.7 A more detailed analysis identifies specific occupants by sector and floorspace (See Figure 5), and applies standard jobs to floorspace ratios based on current HCA guidance to estimate the total

number of FTE jobs in the area. This summarises that the commercial and office floorspace within West India Quay currently accounts for over 10,595sqm of floorspace, with the potential to include over 650 jobs and with a total rateable value of over £2.3m (see Figure 5).

- 4.8 West India Quay therefore is functionally a natural part of the town centre itself, and should – by the Council’s own criteria and in accordance with national policy, be included as an integral part of the Major Centre not a separate transitional activity area. This would be consistent with LBTH’s approach to Westferry Circus which is outside the POL, but included in the Major Centre not the Activity Area. The LBTH Core Strategy states at Policy SP01 (Page 38) an aim to *“facilitate and promote the cultural and leisure sector in town centres by providing multifunctional, diverse and inclusive venues, and promoting associated uses. These uses will be focused in the Tower Hamlets Activity Areas, Major Centre and District Centres”*, with which West India Quay complies.

**B. Reasonable consideration of future development:**

- 4.9 Planning consent has been granted for a Crossrail station, and significant retail/office above around 300m from West India Quay. Paragraph 23 (Page 7 of the NPPF states that plans should *“set out policies for the management and growth of centres over the plan period”* and *“define a network and hierarchy of centres that is resilient to anticipated future economic changes”*. Crossrail represents just such a change and the boundary has been expanded to include the land immediately to the north of the station but does not adequately allow for the opportunity elsewhere at West India Quay.
- 4.10 A significant increase in jobs and intensification of uses fits with the surrounding environment and provides agglomeration benefits, catalysing other local re-development - The Mayor of London (2008) stated that *“Once Crossrail arrives in Canary Wharf, it will act as the catalyst for a further economic boost - allowing the construction of more offices and other facilities, including new shops and more hotels, creating lasting jobs over the coming decades”*<sup>2</sup>
- 4.11 The planning application for the proposed Crossrail stations included specialist technical reports on the agglomeration, regeneration and Wider Economic Benefits to be derived from Crossrail, which could be worth several times more than the transport user benefits. This benefit relies on sites coming forward for commercial development close to key hubs. The Isle of Dogs station has amongst the most prominent potential benefit, given the local employment and gross value added (GVA) output, and the nearby potential of sites for re-development.
- 4.12 The key benefit of Crossrail is enabling continued employment growth in Central London, massive agglomeration benefit, bringing forward of development sites, creating more productive jobs and GVA. Over the next 15-20 years employment growth is estimated to be 100,000, in line with the GLA’s aspirations.
- 4.13 As a result, delivery of Crossrail’s benefits will require the Isle of Dogs to increase its intensification of town centre uses – both through office development and the commercial services, leisure and retail development needed to support it, and sites close by such as Hertsmere House, which already has consent for significant town centre uses, would be a key complementary development.

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<sup>2</sup> <http://www.crossrail.co.uk/news/press-releases/canary-wharf-group-contributes-150m-to-crossrail-will-design-build-isle-dogs-station#.UEYNtdaPWac>

## **5. HOW COULD THE DOCUMENT BE MADE SOUND?**

- 5.1 Revise Figure 39 of the *Managing Development DPD* Canary Wharf Major Centre boundary to include West India Quay (the buildings around Hertsmere Road), or at least to re-include previous areas covered within the Core Strategy definition of the Major Centre.