

Examination of the Tower Hamlets Local Plan

London Borough of Tower Hamlets

Response to Main Matter 8

Matter 8: Heritage, Design and Tall Buildings

Issue 8 – Does the LP take a justified and suitable evidence based approach to heritage, design and tall buildings? Is the LP consistent with national policy in relation to these matters and will it be effective in implementation?

8.1 Are the policies relating to heritage, design and tall buildings sufficiently positive, clear and consistent with both the London Plan and national policy objectives?

8.1.1 The policies relating to heritage, design and tall buildings in chapter 3 (Creating attractive and distinctive places) of the LP have been prepared in line with the London Plan, relevant acts and regulations and the policies set out in the National Planning Policy Framework (NPPF) and are also based on a robust and comprehensive evidence base. The evidence base for the policies in chapter 3 of the LP includes:

- Tall Buildings Study (2018) (SED10);
- Tower Hamlets Conservation Strategy (2017) (SED11);
- Tower Hamlets Urban Structure and Characterisation Study (2009) (SED12);
- Tower Hamlets Urban Structure and Characterisation Study – Addendum (2016) (SED12); and
- London Borough of Tower Hamlets: Conservation Area Appraisal and Management Guidelines (SED13).

8.1.2 The policies in chapter 3 of the Local Plan seek to ensure that developments in the borough achieve high quality design that are sensitive to the character of the area and contribute to a better quality of life for residents. The policies set a positive and clear framework for assessing development proposals in the borough and fully respond to the requirements of the NPPF, in particular paragraph 58 which expects that local plans will “develop robust and comprehensive policies that set out the quality of development that will be expected for the area and an understanding and evaluation of its defining characteristics”. The policies have been drafted in accordance with the six separate criteria in paragraph 58. Tall buildings are not dealt with separately within the NPPF, however its general design and planning principles are considered to be relevant to developments that include tall buildings.

8.1.3 Chapter seven of the London Plan (2016) contains policies relating to design that all boroughs must respond to through their local plan policies. The London Plan (2016) emphasises the importance of high quality design – including policies 7.1 (lifetime neighbourhoods), 7.2 (an inclusive environment), 7.3 (designing out crime), 7.4 (local character), 7.5 (public realm), 7.6 (architecture) and 7.7 (location and design of tall and large buildings). The Greater London Authority (GLA) has confirmed that the policies in the draft LP, including those relating to heritage, design and tall buildings, are in general conformity with the London Plan (as set out in the summary of representations – SD5).

8.1.4 Policy S.DH1 of the LP sets out our overarching approach to delivering high quality design in the borough. A detailed response regarding the elements of this policy, and those in policy D.DH2, that respond to the London Plan and national policy objectives is provided under question 8.2 of the inspector’s main matters. Overall, the

modifications to these policies following the regulation 18 and 19 consultation stages have sought to respond to the comments of stakeholders and developers, simplify the language used and provide absolute clarity on our expectations and requirements.

- 8.1.5 Policy S.DH3 of the LP has been developed to fully respond to the guidance in the NPPF and London Plan regarding heritage and the historic environment. A core planning principle of the NPPF is to “conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations”. Paragraph 126 requires local planning authorities to “set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment”.
- 8.1.6 London Plan policies 7.8 (heritage assets and archaeology), 7.9 (heritage-led regeneration), 7.10 (world heritage sites), 7.11 (London View Management Framework) and 7.12 (implementing the London View Management Framework) provide a clear framework for developing policies relating to the historic environment.
- 8.1.7 Policy S.DH3 was informed by the evidence base studies listed above and has been the subject of extensive discussions with Historic England to ensure that the wording of the policy is in line with all current guidance and legislation. A number of modifications were made to the policy in response to Historic England’s representation at regulation 19 stage to ensure it reflects national policy guidance (MM40, MM41 and MM44). However, these were related to the clarity of the policy and consistency with guidance of some of the terminology, rather the content which was, overall, supported. Policy S.DH3 provides a positive strategy for the protection and enhancement of the historic environment and places a strong emphasis on enhancing the distinctiveness of the borough’s 24 places, which are among the most historically diverse and unique places in London. Policy S.DH3 of the LP makes reference to designated and non-designated heritage assets. The policy fully responds to the NPPF guidance by stating that proposals must preserve or enhance the borough’s designated and non-designated heritage assets in a “manner appropriate to their significance as key and distinctive elements of the borough’s 24 places”.
- 8.1.8 Policies D.DH4 and D.DH6 provide a positive strategy for managing developments including tall buildings, and the impact on views. A detailed response in relation to these policies is provided in our response to questions 8.4, 8.6, 8.7 and 8.8 to the inspector’s main matters.
- 8.1.9 Policy S.DH5 provides clear criteria to safeguard the outstanding universal value of the Tower of London and Maritime Greenwich world heritage sites, as required by the NPPF (paragraph 132), which states that substantial harm to these heritage assets should be “wholly exceptional”. Policy 7.10 of the London Plan (2016) and policy HC2 of the emerging London Plan reinforce this requirement in a London context, and also require the use of world heritage site management plans to inform the plan making process, where these are available. This has been addressed in policy S.DH5, which makes reference to the Tower of London and Maritime Greenwich world heritage site management plans. Minor modifications (MM59 and MM62) were made to ensure the Local Plan terminology reflected those documents.
- 8.1.10 Policy D.DH7 provides guidance regarding developments that are proposed that will exceed the SRQ matrix in the London Plan. A detailed response in relation to this policy is provided under question 6.6 of the inspector’s main matters.
- 8.1.11 Policy D.DH8 relating to amenity seeks to ensure that developments are well-designed and enable residents to enjoy a good level of amenity and natural surveillance. It is based on a set of robust criteria to ensure new developments maintain good levels of privacy, outlook and daylight and sunlight and do not adversely impact on surrounding developments. It responds to a core planning principle of the NPPF, which is to

"always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings".

- 8.1.12 Policy D.DH9 relating to shopfronts requires new shopfronts to be well-designed and make a positive contribution to the street scene, thereby enhancing the character and appearance of the borough. It responds to general guidance on good design in the NPPF which states in paragraph 56 that it should "contribute positively to making places better for people".
- 8.1.13 Policy D.DH10 expects advertisements to be "well-designed and well integrated within the public realm, host buildings and the surrounding area" (page 59). The criteria in the policy are positively and clearly worded to ensure applicants fully understand where we will and will not be able to support applications for new advertisements. Local circumstances that support the sensitive management of advertisements in the borough include: the scale and density of developments coming forward locally; the potential for a cumulative and detrimental impact on the street scene of inappropriate advertisements; the location of a number of arterial roads in the borough providing a gateway into central London; and proximity to a high number of conservation areas.

8.2 Are the criteria of policies S.DH1 and D. DH2 effective and sufficiently flexible to secure high quality design?

- 8.2.1 The criteria in policies S.DH1 and D.DH2 have been drafted to provide detailed guidance on how high quality design can be delivered through the planning process. The purpose of the policies is to outline the key elements of high quality design that will enable the creation of buildings, spaces and places that are sustainable, attractive, durable and well-integrated into their surroundings and that are sensitive to the character of the area. Streets and the public realm are expected to be attractive, accessible and well-designed with developments being required to contribute to improve and enhance connectivity, permeability and legibility and positively contribute to an improved public realm.
- 8.2.2 Policy S.DH1 has been amended to provide greater flexibility in response to representations to the regulation 19 consultation, including promoting opportunities for innovative design (see MM25 and MM26 of the minor modifications table). In addition, minor amendments have been made to policy D.DH2 ensure consistency with Transport for London's Streets Toolkit (MM34) and make a reference to public art within developments (MM36).
- 8.2.3 The policies provide a clear framework to ensure that development in the borough exhibit the highest quality of design in line with the London Plan. In this respect, they fully respond to the requirements of the NPPF - one of the core planning principles of which is to "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings". The policies also take into account the guidance in paragraph 58 of the NPPF that requires local plans to develop robust and comprehensive policies that set out the quality of development that will be expected for the area. It states that "such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics".
- 8.2.4 The supporting text relating to policies S.DH1 and S.DH2 recognises that there is considerable variety in built form across the borough. As such, development proposals should be considered in relation to the particular development site and its context. This requires a degree of judgement, but also provides sufficient flexibility to enable each of the design criteria to be applied to a wide range of circumstances. In addition, the policy criteria do not preclude the use of skilful and innovative design to meet the demand for a high standard of design as the policy focuses on development outcomes rather than the methods for achieving them.

8.3 In the context of policy S.DH1, does an explanation need to be provided regarding bullet point h? How will bullet point i be measured?

8.3.1 The supporting text to policy S.DH1 will be amended to include an explanation in relation to part h after paragraph 3.10 (PSMM20).

8.3.2 The purpose of the bullet point (i) of the policy is to ensure that development does not result in unacceptable impacts on the environment. This should be determined on a case by case basis in accordance with the particular characteristics of the site and development. To clarify this, we propose to remove the reference to reducing impacts.

8.3.3 It is also noted that the policy, as currently worded, does not include the full range of environmental impacts that may arise from development. In view of this, the policy will be reworded (see main modifications reference MJM2) to state that development must:

i. ~~take into account the effects on the microclimate and use design and construction techniques to reduce and mitigate the impact of noise, overheating and air pollution~~ that ensure that the development does not result in unacceptably harmful impacts arising from overheating, wind, air pollution, light pollution and noise pollution and the loss of sunlight and daylight, whilst optimising energy and waste efficiency;

8.4 In relation to Policy D.DH6 –Is the policy wording as currently drafted specific and effective?

8.4.1 Following the publication of the regulation 19 Local Plan, we are proposing to make a number of changes to the wording of policy D.DH6 and the supporting text to improve its clarity and coherence in the light of representations. A number of these changes have already been proposed through the minor modifications table submitted alongside the plan, however further changes are considered to be necessary.

8.4.2 Part 1 of the policy will remain as originally drafted plus the minor amendments proposed at the time of submission and to part 1b (PSMM26).

8.4.3 Part 2 of the policy will be amended to include a reference to the Tall Building Study in order to give it additional weight as a material planning consideration (PSMM28). In the regulation 19 Local Plan, it has only been referred to in the supporting text. It is also appropriate to refer to other policies that may need to be taken into account when developing and considering proposals for tall buildings.

8.4.4 For clarity, further specific changes are proposed to the principles for the Millwall Inner Dock (Isle of Dogs) tall building zone to make it clear that building heights should drop “significantly” from the Canary Wharf cluster and southwards from Marsh Wall (PSMM29/30).

8.4.5 Part 3 of the policy requires more substantial changes to provide clarity regarding how proposals for tall buildings will be assessed where they fall outside the tall building zones. Part 3 of the policy is proposed to be deleted in its current form and replaced with the following alternative wording to address representations received at the regulation 19 consultation stage and more fully reflect the requirements of the London Plan and emerging London Plan (MJM5):

3. Outside these zones, tall building proposals will only be supported where they meet the criteria set out in part 1 and can demonstrate how they will:

a. be located in areas with high levels of public transport accessibility within designated town centres and/or opportunity areas;

- b. address deficiencies in the provision of strategic infrastructure;*
- c. significantly strengthen the legibility of a designated town centre or mark the location of a transport interchange or other location of civic or visual significance within the area;and*
- d. not undermine the prominence and/or integrity of existing landmark buildings and tall building zones.*

8.4.6 The full amended version of this policy is provided in appendix 8.1, including associated changes to the supporting text that reflects the revised policy wording (paragraphs 3.73, 3.75 and 3.76 and policy links).

8.4.7 When read in conjunction with the amended supporting text, the revised policy seeks to provide a clearer and more robust framework against which proposals for tall buildings outside tall building zones will be assessed and the types of infrastructure that will need to be delivered to support such developments. This recognises that whilst the tall building zones are the most suitable locations for tall buildings in the borough, there are other places that may be able to support this type of development, subject to meeting additional criteria.

8.5 Policy D.TC5 – does the scope of this policy need to be extended to incorporate cultural event space? How does the policy as currently drafted address this issue?

8.5.1 The scope of 'cultural event space' is not something that is explicitly defined in planning and land use terms (i.e. it does not have a use class). While 'cultural event spaces' are not referenced within policy D.TC5, existing wording elsewhere in the LP is considered sufficient to support them.

8.5.2 For example, in the context of 'cultural event space' within our open spaces, policy S.OWS1 (part 1.b) and supporting text paragraph 8.15 promotes the multi-functionality of open space to serve a variety of users.

8.5.3 In the context of 'cultural event space' within our community facilities, policy S.CF1 encourages the provision of multi-purpose community facilities to support a range of functions. These facilities are also directed towards town centres in accordance with part 4 of policy S.CF1.

8.5.4 In the context of 'cultural event space' within our public realm, policy D.DH2 (part 2.c in particular) seeks to provide a range of public spaces that can function as places for social gatherings and other recreational uses.

8.6 Is policy D.DH4 supported by a robust evidence base?

8.6.1 The Topic Paper: Views & Landmarks (SED15) provides more detail and explanation about how we arrived at our approach to shaping and managing views in policy D.DH4, as well as the assumptions and information drawn upon to support that approach. It also highlights the national and regional policy context upon which the policy is based, including the NPPF, Historic England guidance (The Setting of Heritage Assets) and the London Plan.

8.6.2 At a regional level, evidence to support the policy is contained in the London View Management Framework, including the identification of the silhouette of Canary Wharf as a recognisable feature in numerous panoramic views of London, with the group of buildings around Canary Wharf forming a distinctive cluster which is visible across London. The Local Plan responds to this, by designating Canary Wharf as a 'skyline of strategic importance' and requiring the management of its setting, with the objective of preserving the distinctiveness of Canary Wharf in the wider landscape. Further details of the views that recognise the skyline of strategic importance are in the Topic Paper: Views and Landmarks. Policy D.DH4 also requires that development proposals

demonstrate how they comply with the Maritime Greenwich and Tower of London World Heritage Site Management Plans.

- 8.6.3 The borough-designated views and landmarks are identified in the conservation area appraisals and management guidelines (adopted in the period between 2007 and 2009). 39 landmarks and 92 views have been identified (see SED13) and they are considered to be intrinsic to the character of conservation areas and, as such, require appropriate protection and management.
- 8.6.4 As part of the process of developing policy D.DH4, all identified views and landmarks in the borough were mapped. Some landmarks were seen from multiple conservation areas and had a visual impact beyond the conservation area they were located in. These landmarks were subsequently identified as 'borough designated landmarks' and full details of these, including the conservation areas that they can be viewed from, are included in the Topic Paper: Views and Landmarks (SED15). The conservation area appraisals and management guidelines have also enabled the identification of 'borough designated views' that are intrinsic to the special character of conservation areas and cover multiple conservation areas. These are views in which the borough designated landmarks and skyline of strategic importance can be seen and are fully detailed in the Topic Paper: Views and Landmarks.
- 8.6.5 Taken together, the adopted planning policy documents that went through rigorous consultations provide a robust evidence base to support policy D.DH4. This includes the designation of the skyline of strategic importance and the borough-designated views and landmarks. Local views are also identified in the conservation area appraisals and management guidelines that are important to the special character of these areas.
- 8.6.6 The map in appendix 8.2 shows an amendment to the boundary of the skyline of strategic importance designation that has been introduced as part of policy D.DH4. Through this modification the boundary of the skyline of strategic importance will be reduced from that currently indicated on the policies map to only include the area of the Canary Wharf (Isle of Dogs) tall building zone. By limiting the extent of this designation to the cluster of tall buildings around One Canada Square, we will be better able to manage the impact of proposals for tall buildings in the surrounding tall building zones on the Skyline of Strategic Importance and enable views of this cluster to be retained in the skyline. This is particularly important in relation to the requirement for buildings to step down significantly to the south of the Canary Wharf cluster within the Millwall Inner Dock tall building zone (see policy D.DH6).

8.7 Is policy D.DH6 sufficiently clear, capable of effective implementation and consistent with national policy and guidance? Is the policy supported by a robust evidence base?

- 8.7.1 We are proposing a number of changes to the wording of policy D.DH6 in response to representations to improve its clarity and effectiveness. These are detailed in the minor modifications and outlined in the response to question 8.4.
- 8.7.2 Implementation of the policy will be monitored through the inclusion of a new indicator (KM17) included in the table of minor modifications (post-submission). This will seek to monitor the rates of approvals of tall buildings inside and outside the zones. For the purposes of this indicator, we will be able to monitor approvals of those schemes that are larger than the threshold sizes set for the referral of planning applications to the Mayor of London.
- 8.7.3 The policy has been developed through close consultation with urban designers, architects, conservation specialists, development management officers and the Tower Hamlets Conservation and Design Advisory Panel to ensure that the criteria can be implemented effectively when assessing planning applications.

8.7.4 The existing policy framework did not give sufficiently clear guidance to allow decisions to be made on tall buildings schemes outside of existing town centres.. For example, some tall building proposals have come forward in locations that are outside of town centres, and others have come forward on sites that are within town centres but are of a scale that is disproportionate to their position within the town centre hierarchy. The Tall Buildings Study includes an assessment of the existing policy framework in the borough relating to the consideration of tall buildings set out in policy SP10 (Creating distinct and durable places) of the Core Strategy and policy DM26 (Building heights) of the Managing Development Document. The assessment highlighted the limitations of the policy approach in resisting inappropriate development of tall buildings.

- Appropriateness of tall buildings in relation to the position of a site in the hierarchy of centres was not plan-led (policy DM26) and did not take account of the relative accessibility of these centres.
- The areas indicating where tall buildings may be acceptable (i.e. City Fringe and Canary Wharf) were not exhaustive and therefore exceptions could be argued for and permitted.
- Where tall buildings were seen as harmful they had been permitted on the basis of the public benefits (such as infrastructure) to compensate for these harmful impacts;
- Where tall buildings were acceptable an appropriate height limit was not clear.
- Where a tall building was present nearby it was often argued to be part of the local character and used to justify why the proposed new tall building was not harmful.
- The impact of tall buildings on future development opportunities was not identified as applicants were not required to consider the cumulative impacts or deliver comprehensive development.

8.7.5 In order to address this, policy D.DH6 of the LP adopts a plan-led approach to tall buildings which identifies specific locations for tall buildings and outlines a series of criteria against which tall buildings will be assessed (as per policy 7.7 in the current London Plan and policy D8 in the emerging London Plan).

8.7.6 Part 1 of the policy recognises that due to their scale and size tall buildings can have a more significant impact on the surrounding area than other types of development and their architecture and design must be of an exemplary standard. This approach is in line with that of the London Plan (2016) and draft London Plan (2017). Part 2 of the policy gives specific guidance on requirements for developments involving tall buildings within tall building zones. A more detailed summary of the principles contained in the policy are set out in the Tall Buildings Study, including guidance on appropriate heights.

8.7.7 As outlined in our response to question 8.4 above, policy D.DH6 (part 3) has been substantially re-drafted to provide more clarity on the requirements for proposals for tall buildings outside the tall building zones and make the policy more robust.

8.7.8 The changes to policy D.DH6 (part 3) are considered to bring it further in line with the London Plan (2016) and the draft London Plan (2017) because it:

- makes reference to the need for tall buildings to be focused in areas of high public transport accessibility;
- addresses improvements required to strategic infrastructure;
- strengthens the legibility of a town centre or mark the location of a transport interchange or other location of civic or visual significance in the area;
- protects the integrity / prominence of existing landmark buildings and tall building zones to ensure that the townscape retains its legibility and degree of variety; and

- protects the significance of heritage assets and their settings to ensure preservation and enhancement of the historic environment.

8.7.9 Policy D.DH6 and the evidence base underpinning it have been developed in a way that fully takes into account the requirements of national policy and guidance. Although the National Planning Policy Framework (NPPF) does not contain policies specific to tall buildings, it sets out a number of more general design and planning principles that are relevant to the development of proposals for tall buildings. The identification of tall building zones is in accordance with the presumption in favour of sustainable development in the NPPF because it seeks to direct the highest concentration of development in the borough to the most appropriate locations that have a high level of access to public transport and service provision. Where areas are currently deficient in strategic infrastructure, part 3 of the policy seeks to ensure that this is brought forward alongside new developments of tall buildings. Paragraph 56 of the NPPF places great importance on the design of the built environment, stating that “good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”. Local authorities are expected to plan positively to achieve high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Local plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. These should be based on a clear vision for the future of the area and upon a detailed evaluation of the characteristics that define it. The NPPF promotes an urban design led approach to planning that requires buildings to respond to the location in which they are located rather than prescribe specific architectural styles. Planning policies are required that will: function well and add to the quality of the area; establish a strong sense of place, using streetscapes and buildings to create attractive places to live; optimise the potential of a site and support local facilities and transport networks; respond to local character, history and identity; create safe and accessible environments; are visually attractive; respond well to heritage assets and their setting; and respond to the views of local people.

8.7.10 Historic England published a Tall Buildings Advice Note in December 2015. Whilst its main focus is the impact of tall buildings on heritage assets, it also provides a number of general guidelines surrounding the design and location of tall buildings. The advice note strongly encourages the inclusion of tall buildings policies in Local Plans, including:

- identifying the role and contribution of tall buildings as part of an overall vision for a place;
- ensuring the setting of heritage assets are protected from any potential negative impact from tall buildings;
- identifying areas that are appropriate for tall buildings in advance of specific proposals;
- in selecting areas for tall buildings give due consideration to impacts on land outside the local authority’s area;
- giving a clear expression of spatial scale and design quality requirements for new tall buildings;
- encouraging an appropriate mix of uses that meets local needs;
- ensuring early public consultation on the principles of tall building development;
- reducing unnecessary, speculative applications in the wrong places;
- identifying sites where removal of existing tall buildings may enhance the environment; and
- consideration of the impact on local communities.

8.7.11 With respect to the above, the guidance from Historic England gives strong support towards the inclusion of a specific policy on tall buildings in the plan. In accordance with the guidance, the policy provides a positive, managed approach to the location and design of tall buildings rather than a reaction to speculative development

applications, which reflects the local vision of the borough. The policy is also informed by characterisation and building height studies, which support the local definition of tall buildings and the identification of appropriate locations for tall buildings, as recommended by the guidance. The guidance has also informed the methodology for the Tall Buildings Study on which the policy has been based.

8.7.12 As stated above, policy D.DH6 has been prepared in line with the current London Plan in that it adopts a plan-led approach to the development of the borough, in which specific areas are identified as being appropriate for tall buildings. All of these areas are located within the Central Activity Zone and opportunity areas, as required under policy 7.7 of the London Plan (location and design of tall and large buildings). In addition, the design criteria in policy D.DH6 (part 1) reflect those that are set out in policy 7.7 of the London Plan (parts C, D and E). For example, the need for tall buildings to relate to their context, have a positive relation to surrounding streets and not have adverse impacts on micro-climate and heritage assets.

8.7.13 Together with these changes, policy D.DH6 provides clear guidance on the location, scale, form and appearance of tall buildings in the borough so that they can be successfully integrated into the surrounding context and contribute positively to the changing skyline of the borough.

Is the policy supported by a robust evidence base?

8.7.14 Policy D.DH6 is underpinned by the Tall Buildings Study (February 2018). It was identified at the time of the regulation 18 consultation that a comprehensive assessment of different parts of the borough was required to underpin a new tall buildings policy, particularly given the approach advocated in the London Plan (2016) that boroughs should identify appropriate, sensitive and inappropriate locations for tall buildings.

8.7.15 In accordance with the London Plan (which generally limits tall buildings to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport), the Tall Buildings Study carried out an initial search of areas appropriate for tall buildings, based on an overlay of the borough's three opportunity areas (City Fringe, Isle of Dogs and South Poplar and Lower Lea Valley), its major centre at Canary Wharf, 8 district centres and PTAL. This work also involved an assessment of the character of the areas of search based on the evidence set out in the Urban Structure and Characterisation Study (2009) and its addendum (2016) to help identify sensitivities and the appropriateness of tall buildings. This characterisation work included:

- an assessment of the character and townscape – including identification of character areas and typologies and the locations of existing tall buildings and local landmarks;
- identification of existing tall building heights;
- public transport accessibility;
- sensitivities to change including the location of conservation areas and listed buildings and public open space;
- potential areas of change including site allocations, current tall building proposals and other potential areas of change; and
- a summary of whether the Local Plan 'place', or parts of it, are appropriate, inappropriate or sensitive to tall buildings.

8.7.16 The Tall Building Study identifies a series of tall building principles based on guidance, good practice and an in-depth understanding of the context of different parts of Tower Hamlets. These are to: promote outstanding design; enhance image and strengthen sense of place; protect and enhance the existing heritage and townscape; strengthen legibility; control the location of tall buildings; be proportionate to the role and importance of a place; to form clusters, where appropriate; safeguard Canary Wharf's

iconic image; deliver economic growth and regeneration; deliver comprehensiveness; promote compact development; and deliver added value. These principles are specific to the borough and provide a basis for understanding how the development of tall buildings should be managed in the borough, ensuring that the existing environment and character are both protected and enhanced, as well as how tall buildings can bring opportunity and regeneration to the borough. The principles form the basis for the tall buildings guidance set out in the study, including the identification of appropriate locations for tall buildings and criteria to ensure their high-quality design. The guidance is closely reflected in policy D.DH6 through the design criteria set out in part 1 and the location of tall building zones set in part 2.

8.7.17 Through this characterisation work, the Tall Buildings Study identifies five tall building zones across the borough (see figure 8 in the Local Plan) and sets out building height principles for each zone (pages 196-198). It also identifies other parts of the borough outside the tall building zones where there may be opportunities for individual tall buildings to serve as landmarks, but relating to their role as a local, district or metropolitan landmark and the surrounding context height (table 5.1).

8.7.18 It is recognised that the initial search for areas in the borough suitable for tall buildings in the Tall Buildings Study is limited to those parts of the borough that fall within the opportunity areas identified in the London Plan (2016), with the exception of the Roman Road West district centre which does not fall within an opportunity area. The draft London Plan (2017) does not propose to follow this approach of limiting those areas deemed suitable for tall buildings to opportunity areas. However, part 3 of policy D.DH6 as amended applies to all proposals submitted for tall buildings outside the tall building zone and reflects the priorities of the draft London Plan (2017) to direct tall buildings to areas of high public transport accessibility and/or town centres. It is anticipated that the next iteration of the Tall Buildings Study will follow the guidance contained in the new London Plan and extend the scope of the assessment to the whole borough.

8.8 At present, the definition provided of a tall building at paragraph 3.64 is inconsistent with the glossary term provided at appendix 6, page 281. Is either definition used consistent with the London Plan? I request that the Council ensure there is a consistency in the approach to the terminology used.

8.8.1 An amendment has been made to the definition of a tall building in the glossary so that it reflects the definition in paragraph 3.64 (MM315). A further minor modification will be made to paragraph 3.64 to insert the word 'prevailing' to provide even greater clarity as to what developments will be considered to be tall buildings (PSMM31).

8.8.2 The definition is consistent with paragraph 7.25 in the London Plan (GLA, 2016) which states that:

"Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor".

8.8.3 The second part of the definition seeks to give a local definition of a tall building as required in policy D8 of the draft London Plan (2017):

Definition

"A Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".

8.8.4 The definition of tall buildings in the LP as those of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is less) is an

appropriate response to this requirement to define what is considered to be a tall building in Tower Hamlets. It takes into account that large parts of the north and east of the borough and the southern part of the Isle of Dogs comprises modest scale residential buildings typically between two and four storeys. Significant areas of the borough are also covered by conservation areas. In this context, the introduction of building of more than twice the context height could have a substantial impact on its site and surroundings. The definition in the LP is not intended to constrain development, but rather give officers greater scope to manage development in a way that ensures local character can be given full consideration in such cases. This is particularly important in a borough like Tower Hamlets which has extreme variations in building heights in different areas and a need to ensure heights that are deemed appropriate in some parts of the borough (north Isle of Dogs and the City Fringe) are not considered set a precedent for inappropriate development in adjacent areas of a different character and scale.