

**London Borough of Tower Hamlets  
Examination of the Local Plan**

**Matter 8: Heritage, design and tall buildings  
Issue 8**

**Statement submitted by Peter Stewart Consultancy on behalf of Transport for  
London Commercial Development and Tower Hamlets College**

1. This statement is submitted in order to make the case that the Local Plan site allocation 4.1 (called 'Aspen Way' in the local plan and referred to below as 'the Site') should be included within the tall building zones defined on p53 of the Regulation 19 consultation version (October 2017) of the Tower Hamlets Local Plan 2031 ('LP'). The Site includes both the **Poplar DLR site** (east part of site allocation area) and also the site of **Tower Hamlets College** (now part of New City College) (adjoins DLR site, to the west of the DLR site). This submission is made on behalf of both of those parties.
2. Question 8.7 in the Schedule of Matters and Issues for Examination is:

*'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?'*

3. This statement makes the case that policy D.DH6 is not supported by a robust evidence base because the definitions of the extent of the tall building zones, and the consequent exclusion of the Site from the tall building zones, are not supported by clear evidence. To include the Site within the tall building zone would be consistent with available evidence, as set out below; to exclude it is not consistent with the evidence.
4. Reference is made below to Figures 01-06 which can be found at the end of this document.

**Introduction to the Poplar DLR site**

5. Site allocation 4.1 'Aspen Way' is noted in para 5.8 on p221 and shown in Figure 38 on p219 of the LP.
6. Policy D.DH6: Tall buildings, paragraph 2 (p50), states that tall buildings will be directed towards designated Tall Building Zones as shown on the Policies Map and in figure 8 (p53).
7. The zones are as defined in the LBTH Tall Buildings Study (February 2018) ('the Study'), which is cited on p55 of the LP as the first evidence link for the policy.

8. The Study proposes five tall building zones, listed on p196 of the Study and shown on a plan on the same page. The Site lies immediately north of zone 2, called 'Canary Wharf Cluster' in the text and 'Canary Wharf Central' on the plan, and immediately west of zone 4, called 'Blackwall Cluster'.
9. Canary Wharf Cluster is contiguous with zone 3, 'Millwall Inner Dock Cluster', to its south. The two zones have different characters: the former larger, more formally planned and more office focussed; the latter at a lower scale, less formal and more residential. While Canary Wharf Cluster and Blackwall Cluster are not drawn as contiguous on the map, they are for all intents and purposes contiguous, since all that lies between them is the east-west infrastructure corridor of Aspen Way and the parallel DLR viaducts. These two clusters also have different characters and the contrast is similar to that described above.
10. If the two clusters are taken as effectively contiguous as suggested above, then the Site adjoins both clusters – it is contiguous with the Blackwall Cluster and separated from the Canary Wharf Cluster only by the east-west road and rail corridor.

### **The Site and its surroundings**

11. The Poplar DLR site comprises rail sidings and associated buildings and facilities. The larger part of it lies between the Aspen Way / DLR transport corridor to the south and sites to the north which front Poplar High Street. To its west is the Tower Hamlets College site, which is also part of site allocation 4.1. This site is connected across Aspen Way and the DLR to the North Quay site via a pedestrian bridge which also gives access to Poplar DLR station. To the west of this is a leisure centre building with associated pitches; this site is also within site allocation 4.1.
12. South of the Site on the other side of Aspen Way are the Billingsgate Market site, which is site allocation 4.2 and lies in the 'Canary Wharf Cluster' tall building zone. West of this is the North Quay site which is site allocation 4.9 and also lies in the same tall building zone. South of these sites, on the other side of the dock and the Crossrail station, are the tall office buildings of Canary Wharf.
13. East of the Site is the Poplar Business Park site, where an existing planning consent for a mixed-use project which include tall residential buildings is in the process of being built out as 'Manhattan Plaza'. This site lies in the Blackwall Cluster tall building zone. East of this on an adjacent site are further tall residential buildings, Wharfside Point (North and South), and further tall residential buildings lie east of this, in the same zone.

### **Urban structure and urban form**

14. Poplar Business Park and the Site and the remainder of site allocation 4.1 all have a similar situation within the urban structure of the area, lying between the historic east-

west road of Poplar High Street to their north and the parallel, more recent major infrastructure alignment of Aspen Way and the DLR to their south. Refer to Figure 01.

15. The north side of this east-west strip is occupied by various buildings accessed from Poplar High Street. The south side of the strip is quite different, and already under development or allocated for development. Refer to Figures 01 and 02.
16. Aspen Way and the DLR provide a high degree of physical and psychological or perceptual severance between Poplar to the north and Canary Wharf to the south. Improving north-south connectivity in this area in order to overcome this severance is a policy objective (see p221 of the LP, item 19). There is a significant shift in scale between areas north of the Site and areas to the south. Poplar Business Park has been designed successfully to mediate between these scales, with a carefully considered composition of residential towers and lower rise buildings. Refer to Figure 02.

#### **LBTH Tall Buildings Study characterisation of place: Blackwall**

17. On the map of '24 places of Tower Hamlets' on p15 of the LP, which characterise the borough as it exists today, the Site is shown within a limb of Blackwall which extends westwards along the line of Aspen Way, rather than in Poplar, the 'place' to the north, which extends north of Poplar High Street. This categorisation recognises correctly that Aspen Way is at present something of a 'non-place' that does not really belong to Poplar or to Canary Wharf, and that as a consequence the area between Poplar High Street and Aspen Way – and in particular the south part of this zone – is not seen as belonging to Poplar.
18. The Tall Buildings Study considers the existing character of Blackwall, as defined on the '24 places' map, on p166-171. The study area extends east, west and north of the Site. It notes that 'Blackwall is a place of contrasts'; that 'historic fabric is intermixed with a number of unremarkable post-war estates at a variety of scales'; and that there are conservation areas to north and south of the area and a number of listed buildings. Buildings heights are characterised thus (p170): 'Typically 2-4 storey west of Cotton Street; 6-8 storeys east of Cotton Street and with a number of tall buildings at Clove Crescent, Blackwall Way and Providence Wharf.'
19. This account of building heights fails to take account of the presence of the Manhattan Plaza development and the earlier Wharfside Point (North and South) buildings which lie west of Cotton Street, all of which are prominent tall residential buildings, of up to 25 storeys.
20. On p171, the section concludes that 'Development of tall buildings is considered appropriate in parts of Blackwall (towards the east) however this needs to be co-ordinated in order to enhance the sense of place and deliver an improved pedestrian environment.'

## **LBTH Tall Buildings Study: the Blackwall cluster**

21. The extent of the proposed Blackwall cluster is explained on p198 of the Study:
- a. *'The centre of the Blackwall cluster will broadly extend between Blackwall and East India DLR stations located to either side of Aspen Way and helping to bridge the severance that this causes. Development heights will step down from this centre. The cluster must be subservient and separate from the nearby Canary Wharf cluster and will need to be carefully managed to ensure that an appropriate composition is formed with buildings of varying height allowing sky views between them when viewed from the river or the O2 on the Greenwich Peninsula. Currently the tallest building in the area is Providence Tower at Providence Wharf at 136m. Greater height is not considered appropriate ensuring that the cluster is perceived to step down significantly in height from Canary Wharf. Developments must deliver added value required to create a better functioning place and to address the severance issues in the area.'*
22. Beyond this statement there is no further detailed account of why the boundaries of the Blackwall Cluster have been set where they are shown.

### **The case for the Site to be included in the Blackwall Cluster**

23. With the development of North Quay and Billingsgate Market sites in due course, the scale of the group of tall buildings group south of Aspen Way can be expected to extend further north, since both sites are in the Canary Wharf Cluster. The dramatic contrast with Poplar to the north will become more pronounced. There is a case for tall buildings on the Site to effect a transition in height from the scale of Canary Wharf south to the scale of Poplar to the north, as is being done successfully in the Manhattan Plaza development and has been done on the Wharveside Point development immediately to its east.
24. The Site is an allocated site within an Activity Area. Mixed use development, mainly employment and residential, is clearly appropriate for the Site.
25. The functions of the Poplar DLR depot with its sidings will remain on site. Development at the scale envisaged in the allocation will take place on top of a deck to be built on top of a reconfigured depot and sidings. In these circumstances, a certain quantum of development is necessary to make a project on this part of the Site feasible, and this will inevitably result in buildings that will be categorised as tall buildings by the definitions set out in the Study and the LP. Similarly, the College is also looking at redevelopment of its site to re-provide the college facilities, and this would appear to be feasible only with significant development above the college podium. See Figures 03 and 04.
26. That might not in itself be a sufficient justification to be build tall buildings on the Site; for example, if tall buildings would lead to adverse consequences that were judged to

be greater than any benefit. But that it is not the case; the Site is suitable in principle for tall buildings. The fact that for the allocation to be realised, the development will have to include tall buildings, is put forward as further support for including the Site in the Blackwall Cluster.

27. The Site has excellent transport connections. It is 100m or so from a DLR station. Beyond this, it has the potential to contribute to improved links across the DLR and Aspen Way to the south, connecting to Canary Wharf and its Crossrail station, which is 200m or so away – this is a self-evidently desirable extension of the connectivity improvements promoted on p198 of the Study, as cited above at para 21. Existing connectivity, via the bridge over Aspen Way, and the potential to improve connectivity further, are in themselves an indication of the suitability of the Site for tall buildings. See Figures 03 and 04.
28. The Study sets out ‘tall buildings principles, of which no. 10 (p195) states:
  - a. *‘All too often tall buildings are promoted on small sites where they compromise potential development opportunities on neighbouring sites and where it is difficult to address the challenges of servicing and the provision of a mix of uses to provide activity at ground floor level. Tall building proposals should be part of a more comprehensive development so that these issues can be adequately addressed.’*
29. Site allocation 4.1 is 6.1 hectares in area (see LP p224), capable of delivering a substantial amount of development in a manner consistent with the above principle. A development on such a large Site which included tall buildings would be consistent with the way in which other comparable sites in LBTH have been developed, particularly in and near the Isle of Dogs. A development on the Site that did not include tall buildings, even if such a form of development were viable, would not optimise the potential of the Site, as required by London Plan policies 3.4 and 7.6
30. London Plan policy 3.7 deals with large residential developments including complementary non-residential uses, and states that large sites (over five hectares or capable of accommodating more than 500 dwellings - as noted the area of the Site is 6.1ha) ‘have particular potential to define their own characteristics and accommodate higher density development in line with Policy 3.4.’ This is an important policy in respect of the relation between sites and their surroundings which is relevant to townscape and visual impact considerations as well as other matters. It is an explicit recognition that on large sites, contrast with the character of a site’s surroundings may well be appropriate.
31. The LP (p175) divides the borough into four sub-areas in order to manage development opportunities. The LP (p175 and Fig 19 on p176) divides Poplar (as defined in ‘24 places of Tower Hamlets’) between two of these four borough-wide sub-areas: ‘Isle of Dogs and South Poplar’ to the south (an opportunity area), and ‘Central’ to the north (not an opportunity area, though with development capacity).

The whole of Blackwall, as defined in '24 places of Tower Hamlets', is placed in the Isle of Dogs and South Poplar sub-area.

32. Further support for the case for tall buildings on the Site can be found in the Isle of Dogs and South Poplar Opportunity Area Planning Framework draft ('OAPF') issued by the Mayor of London on May 2018. This envisages South Poplar (p86-87) as a 'new gateway to the Docklands' which will 'contrast and complement with [sic] the characters and functions of Canary Wharf and Poplar'.
33. Development of the Site will help overcome the 'non-place' quality referred to above. Successful development will mediate between Poplar and Canary Wharf in the manner encourage in the OAPF in a number of regards, including physical scale and building height as well as connectivity. See Figures 05 and 06.

### **Summary and conclusion**

34. The above representations make the case that on a proper analysis, the Blackwall tall building zone should be extended to include site allocation 4.1.

35. **Precise change to the LP that is being sought:**

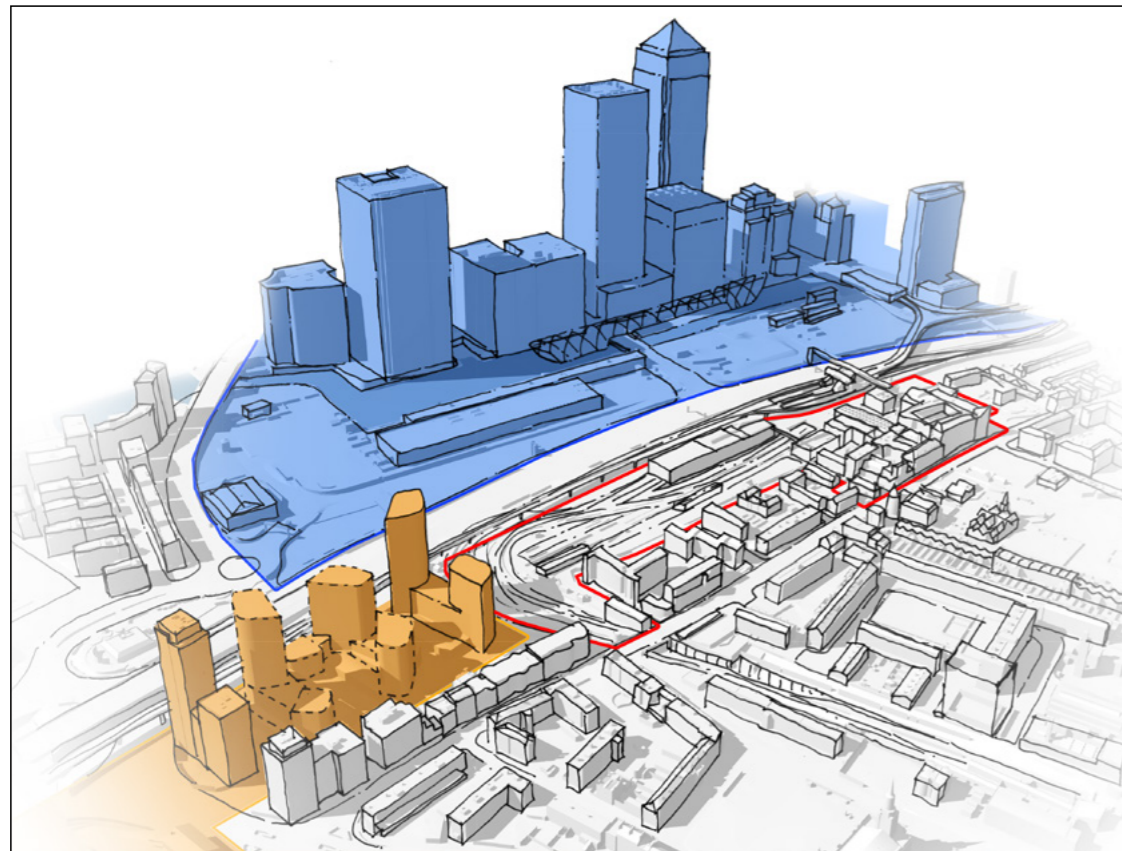
**Figure 8 on p53 of the LP should be amended so that the boundary of area 4 (Blackwall Tall Building Zone) is extended to include site allocation 4.1 Aspen Way.**

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# FIG. 01: TRANSITION OF SCALE

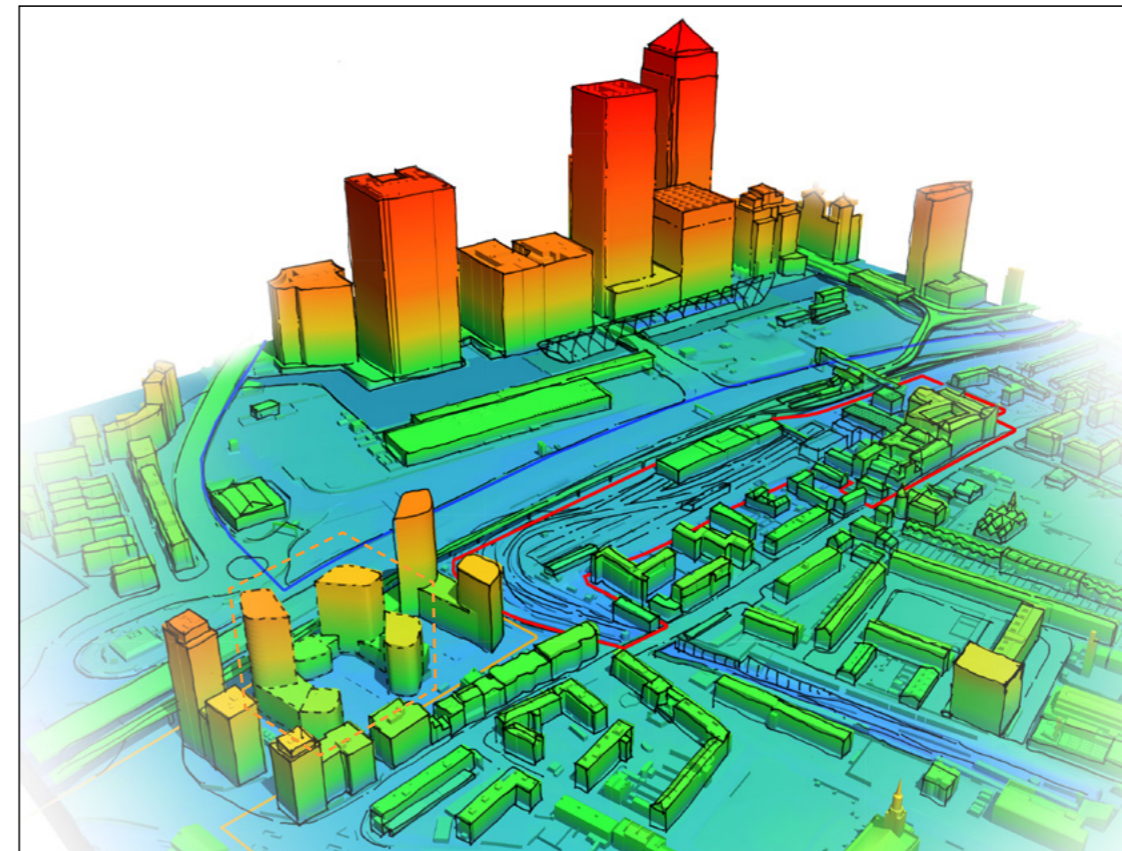
01: Draft Tall Building Zones



- Canary Wharf Zone
- Blackwall Zone
- Site Allocation 4.1: Aspen Way

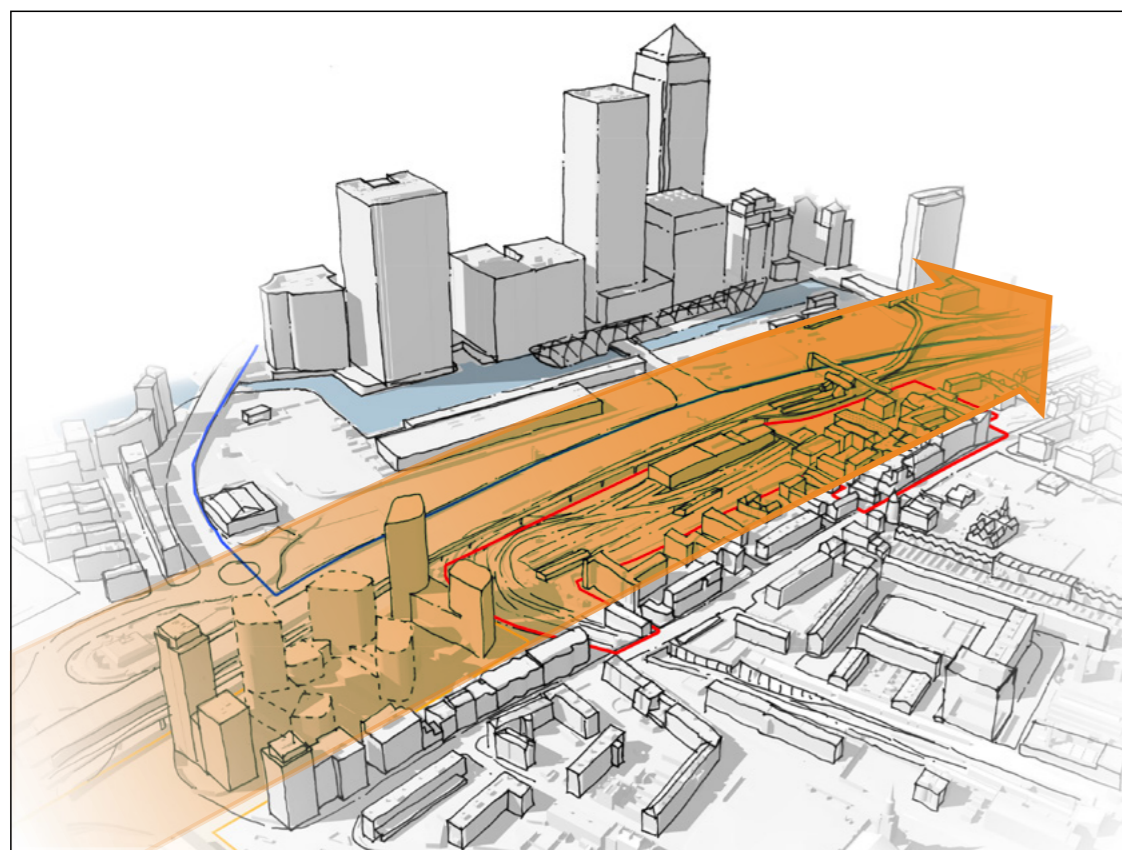
\*Based on 'Figure 8: Tall building Zones, Tower Hamlets Local Plan 2031 (Regulation 19)

02: Existing Building Heights Diagram



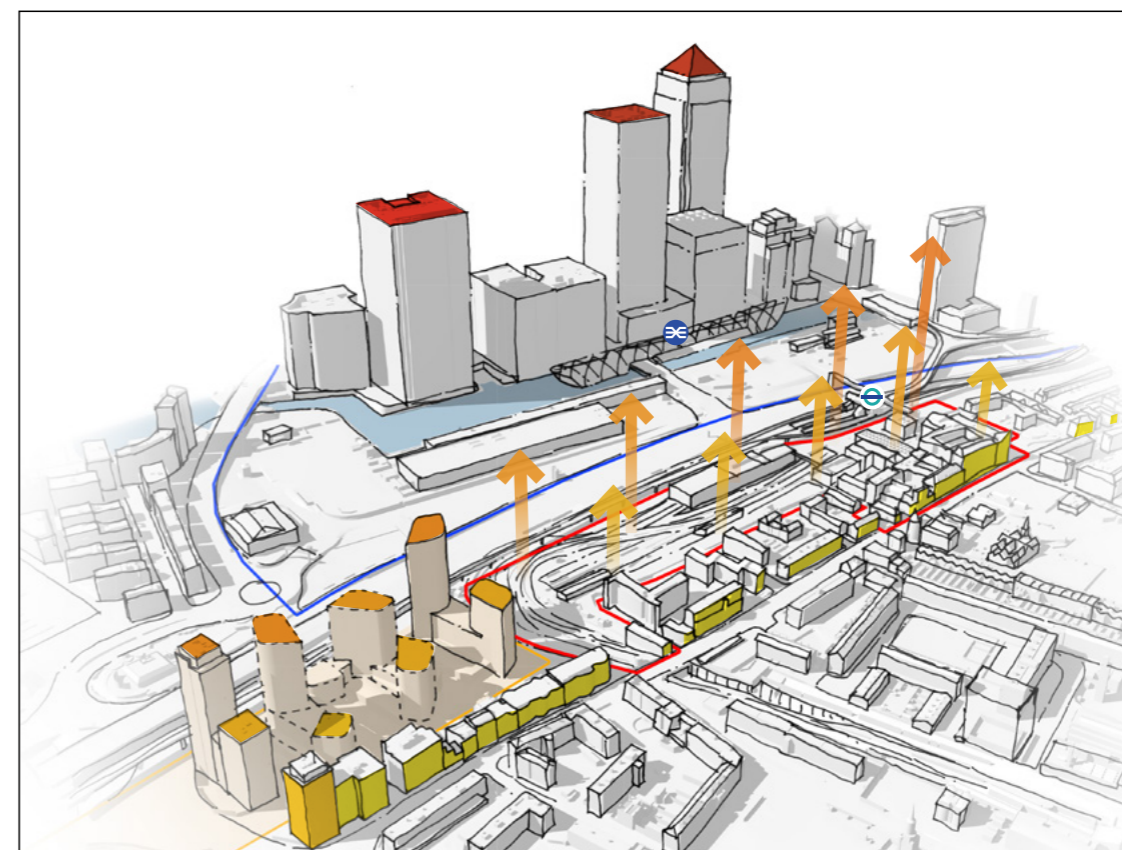
- < 10m AOD
- < 25m AOD
- < 50m AOD
- < 100m AOD
- < 250m AOD
- Site Allocation 4.1: Aspen Way
- - - Under Construction

03: Proposed Extension of the Blackwall Tall Building Zone



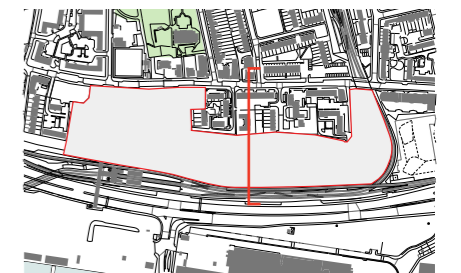
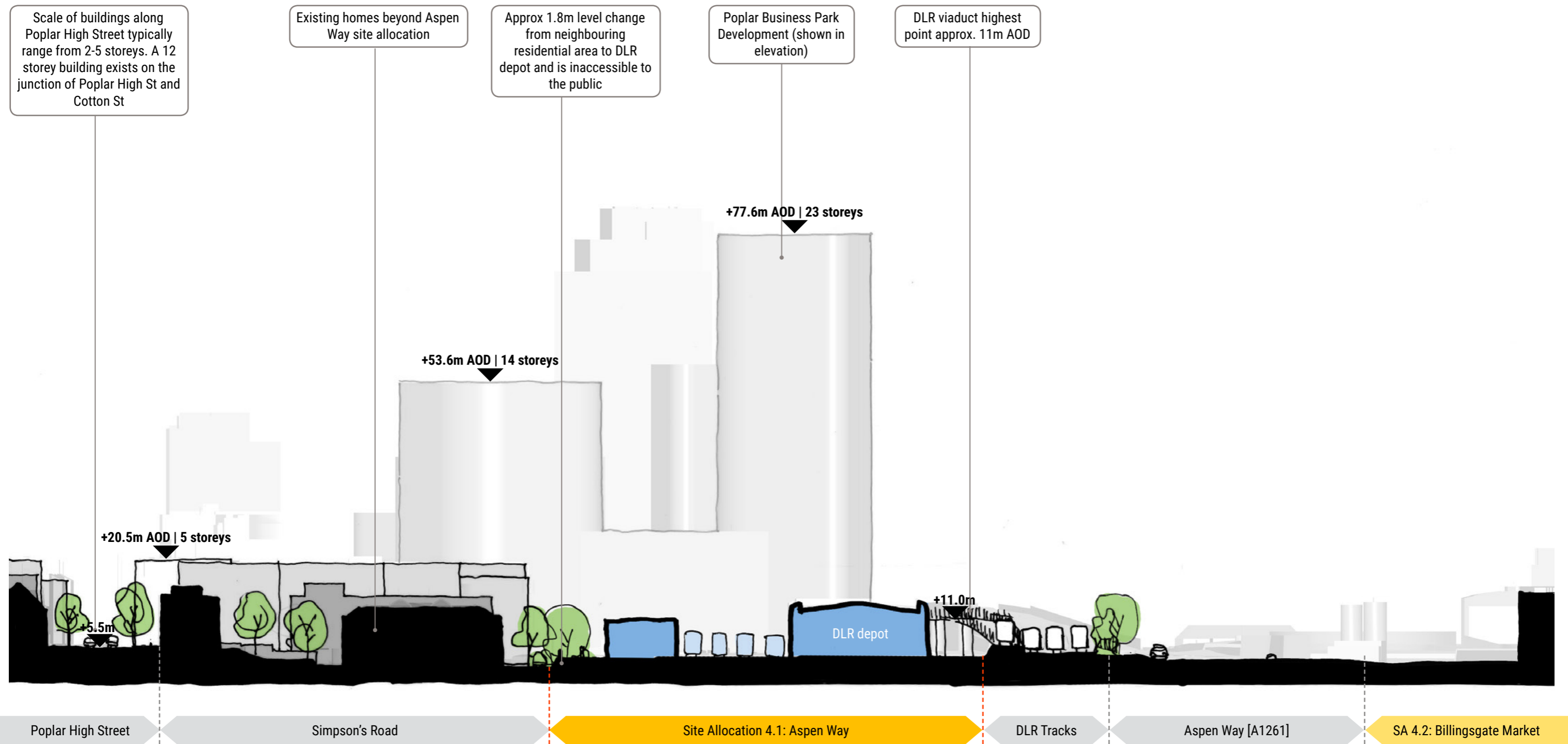
- Proposed Extension of Blackwall Tall Building Zone

04: Place Specific Massing Improves City Legibility



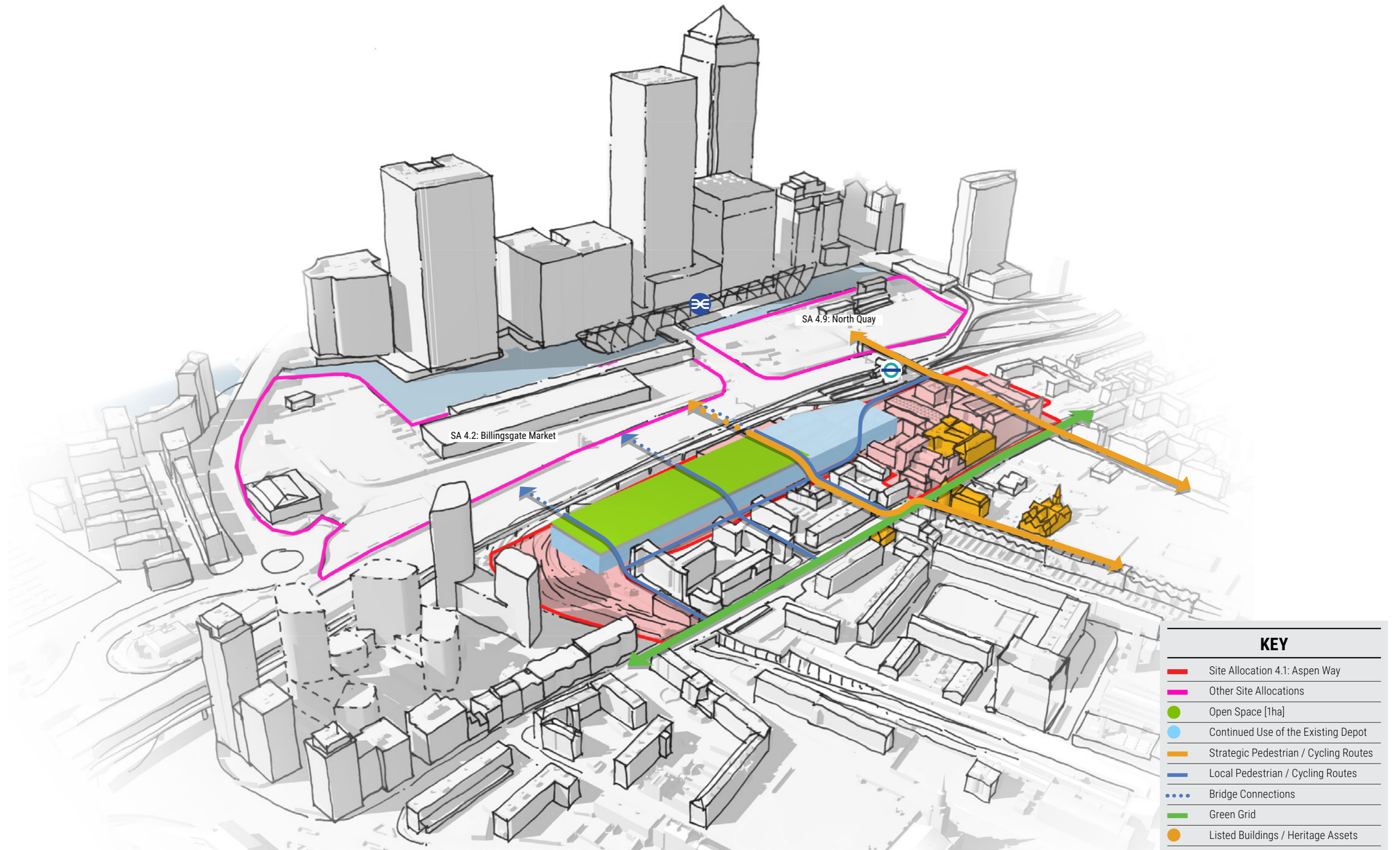
- ⊕ Poplar DLR Station
- ⊕ Canary Wharf Crossrail
- Potential Area of Height
- Site Allocation 4.1: Aspen Way

# FIG. 02: EXISTING NORTH-SOUTH SECTION LOOKING EAST

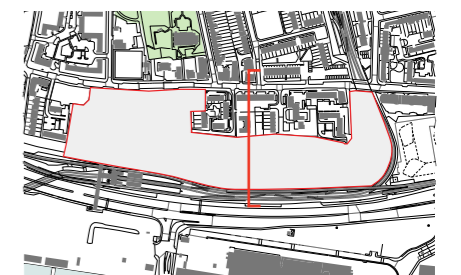
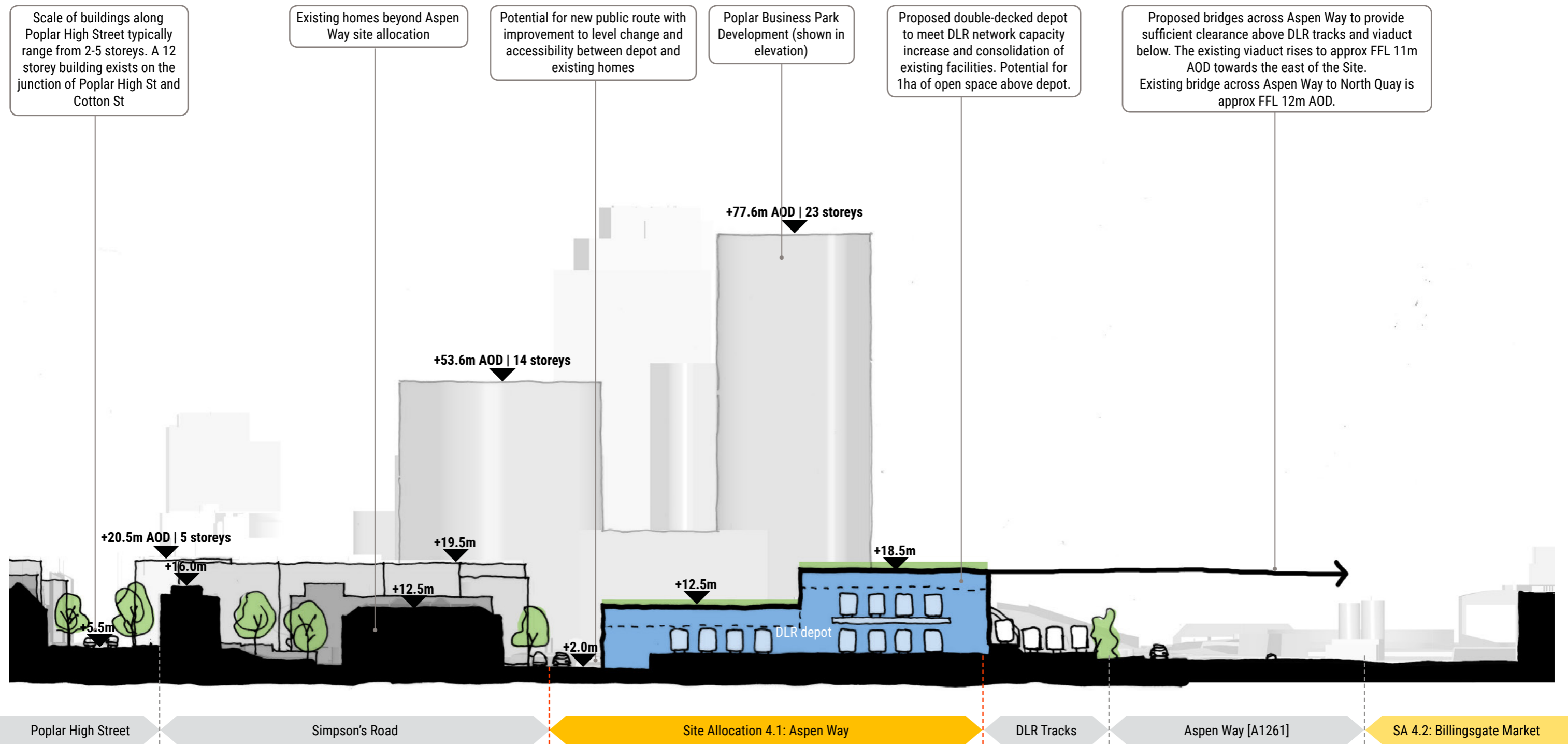




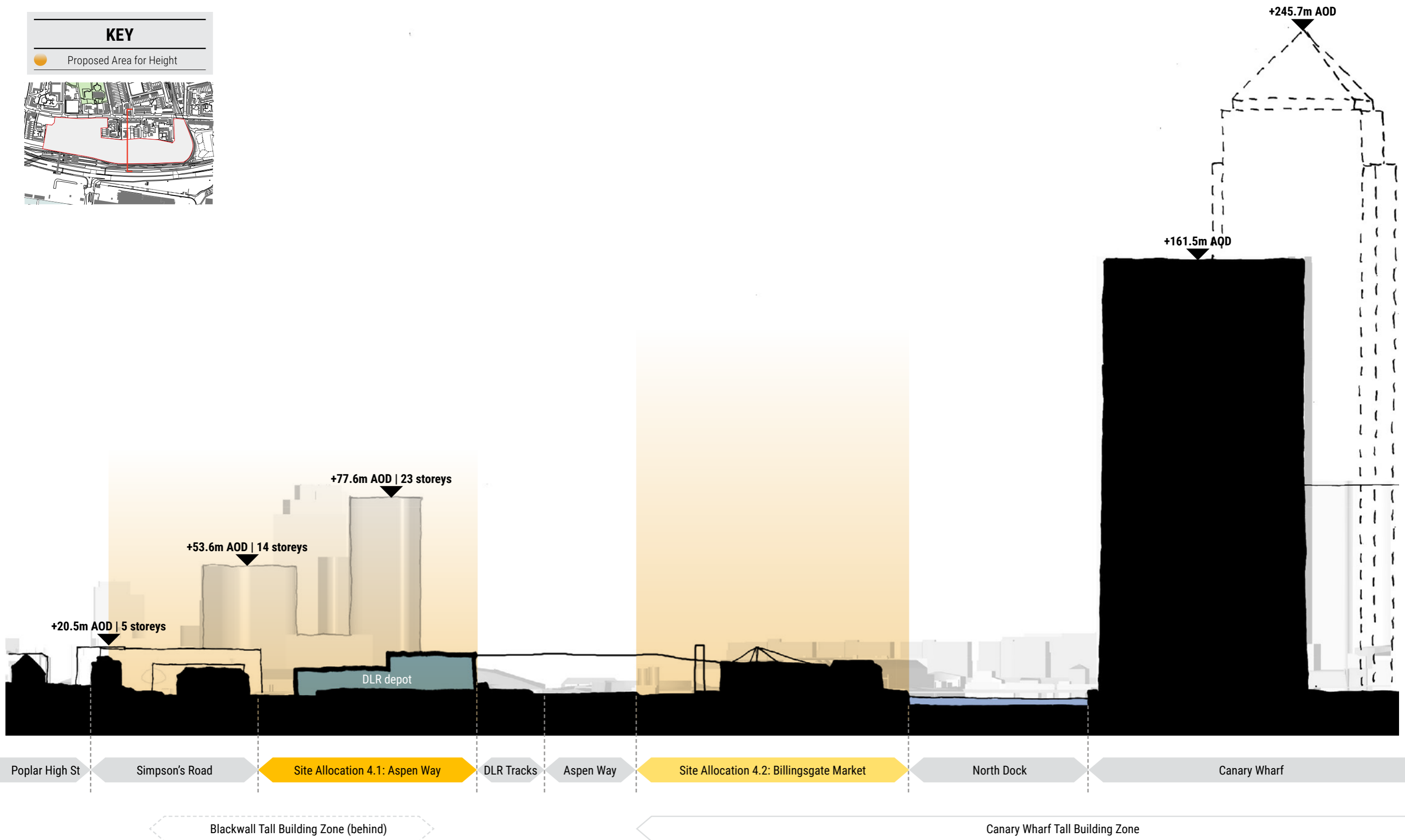
# FIG. 03: SITE ALLOCATION 4.1: ASPEN WAY KEY OVERARCHING PRINCIPLES



# FIG. 04: DIAGRAM ILLUSTRATING THE ASPEN WAY OVERARCHING PRINCIPLES



# FIG. 05: DIAGRAM ILLUSTRATING PROPOSED HEIGHT TRANSITION



# FIG. 06: DIAGRAM ILLUSTRATING PROPOSED HEIGHT TRANSITION

