

Examination of the London Borough of Tower Hamlets Local Plan

Schedule of Matters and Issues for the Examination

Matter 8, Issue 8

Representor ID: 624580/Canary Wharf Group Plc

27 July 2018

Hearing Statement on behalf of Canary Wharf Group Plc ("CWG")

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?

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**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?**

1. **Policy S.DH3: Heritage and the historic environment.** At 3.38 (page 43) 'strategic and local designated views' are listed as a heritage designation. Views are not heritage assets, let alone designated heritage assets, as defined in national policy and in the London Plan and as discussed in Historic England guidance.

**Proposed amendment to LP:** This item should be removed from this list in order for the Local Plan (LP) to be consistent with national and London Plan policy.

2. **Policy D.DH6: Tall buildings** is not sufficiently positive. Comments on this are set out below under questions 8.4 and 8.7 below.

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

3. The policy wording is not specific and effective in the respects set out below. The problems flow from the LBTH Tall Buildings Study, which is the part of the evidence base for this policy that is specific to LBTH as a place, and which is referred to in the LP (para 3.70) as guidance. Our comments below should be read with our comments on question 8.7 below.

**Section 2 of policy**

4. The principles for the Canary Wharf (Isle of Dogs) tall buildings zone include that "*Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square.*"

5. This is too prescriptive, subjective and simplistic. The pattern of development being promoted is only one way that a tall buildings cluster could develop. It does not take account of how clusters such as that on the Isle of Dogs, and indeed almost all other tall building areas across the world, have developed in practice; and this wording makes no allowance for site specific conditions. There is no evidence that the pattern of development being promoted should be preferred to other possible patterns.
6. The principle referred to is inconsistent with the reality of how the Isle of Dogs tall buildings cluster has already developed and is set to develop further through other consented and under-construction schemes.
7. Figures 1a and 1b appended to this Hearing Statement show diagrammatically an aerial view of the existing Canary Wharf cluster together with projects that have not yet been built but have planning consent, and also projects which have been submitted for planning consent but are not yet determined. Fig 1a shows the consented scheme for the North Quay site and Fig 1b. shows Canary Wharf Group's subsequent proposal for this site. Figures 2 to 5 show views of the cluster, as seen from points south, west, north and east of the cluster, showing the same buildings and proposals that are in Figure 1a. Figure 6 shows the viewpoint locations. These are representative viewpoints that have been illustrated in townscape and visual impact assessment reports for many of the projects shown. Reference numbers associated with individual projects mentioned below are the reference numbers shown in Figure 1a/1b.
8. While One Canada Square is and will remain the tallest building on the Isle of Dogs, there are a number of under-construction and consented schemes - the consented North Quay scheme and the Newfoundland (20), Hertsmere House (26), and Riverside South (16) schemes, for example - that will be marginally lower than One Canada Square and will not step down from it to the degree shown in Figure 9 on p54; nor is it clear why they should. There is a strong case that those buildings located against the open space of the River Thames or onto docks, for example, should be taller than those buildings located in more ordinary locations closer to the centre of the cluster. While this results in a different pattern to that shown in Figure 9 which supports policy D.DH6, it is highly subjective to say that one is preferable to the other.
9. In practice, the general pattern that has emerged within the wider Isle of Dogs cluster over the last few decades is for there to be a central cluster of tall commercial buildings around One Canada Square; tall residential buildings such as Newfoundland and Hertsmere House on the periphery of this central cluster; and then a general stepping down beyond Canary Wharf, largely comprising residential tall buildings with a generally slimmer and more articulated form than the central tall buildings (at about 2/3 of the height of the central buildings). It is important to note that this stepping down beyond Canary Wharf is general and modulated, and not strictly linear and progressive from one site to the next.

10. There is not enough recognition in the policy or Figure 9 that a particular site and development may need to respond to several different townscape conditions. It is also not helpful to concentrate on shaping heights to the exclusion of other ways in which areas of development within a cluster can be differentiated (e.g. through form and detailed architecture).
11. We recommend that this policy should be re-written, taking into account how Canary Wharf and the wider Isle of Dogs cluster have developed and are continuing to develop in reality – including projects that have planning consent but are not yet built, as shown in Figures 1-5. The revised policy should not be prescriptive, and should allow room for the characteristics of particular sites and settings to be taken into account.

**Proposed amendment to LP:**

**D.DH6: Tall buildings, section 2, Canary Wharf zone, principles** should be redrafted as follows (NB the 2nd and 3rd bullet points in the LP repeat the 2nd and 3rd sentences in the first bullet point).

Development within this location will be expected to ~~safeguard~~ contribute positively to the skyline and ~~preserve~~ the iconic image and character of Canary Wharf as a world financial business centre. Individual buildings should be integrated into urban super blocks set in the public (Dogs) realm. ~~Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square.~~

~~Individual buildings should be integrated into urban super blocks set in the public realm.~~

~~Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square.~~

**Figure 9**

12. Figure 9 on p54 of the LP illustrates four ‘principles of building clusters’. These are not itemised in the text.
13. Cluster principle 1: we agree that modulation of height is desirable, but not necessarily within an overall ‘stepping-down’ strategy.
14. Cluster principle 4: this principle is unrealistic and is already superseded by consented and under-construction schemes in respect of Canary Wharf – for example, development at Wood Wharf will have a considerably greater apparent height than the central Canary Wharf

towers in views from the riverside along Greenwich Peninsula. The principle is inconsistent with patterns of development form that are already established.

15. The only reference to Figure 9 in the text is in 3.72. The LP would be clearer if the text of paras 3.59-3.75 itemised and cross referred to the principles explicitly; the principles and the text should however take account of the above comments.

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

16. The language applied to the management of views is that usually used in relation to heritage assets – i.e. ‘preserve or enhance’. While heritage assets can be an important component in views, care needs to be taken to ensure that views themselves are not treated as heritage assets. Where such language is used in, for example, the LVMF, it is used in respect of heritage assets within the views, rather than the views overall. As set out in paras. 44 and 46 of our Regulation 19 Representations, the further evidence is required to support the identified views in part c of policy D.DH4. We can find no evidence to support the local views identified in part f of the policy, therefore this criteria should be removed.

**Proposed amendment to LP:** redraft D.DH4 as follows:

Development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. ~~Intrusive-Inappropriate~~ elements in the foreground, middle ground and backdrop of such views will be resisted. Development will be required to demonstrate how, where relevant, it:

- a. complies with the requirements of the London View Management Framework and World Heritage Site Management Plans (Tower of London and Maritime Greenwich);
- b. ~~positively~~ contributes positively to the skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf (as defined as the Policies Map);
- c. ~~preserves or enhances~~ takes account of the prominence of the borough-designated landmarks and the skyline of strategic importance in the borough-designated views (as defined in figure 7);
- d. contributes positively to preserves or enhances local views identified in conservation area appraisals and management guidelines;
- e. contributes positively to preserves or enhances visual connection of the public realm with water spaces; and
- f. ~~enhances townscape and other local views which are important to the identity and character of the place.~~

17. Figure 6 which accompanies this policy is confused and confusing. It is not clear if the dotted white lines relate to the division between foreground, middle ground and background within the view, or between the ‘landmark’ and ‘skyline’. If the former, the division seems to relate

more to vertical location within the image rather than the sense of depth and perspective that a viewer would experience – the ‘background’ is defined in the figure as the top part of the view, in the sky, rather than a background layer within the view that would be perceived as being further away from the viewpoint than the middle ground.

**Proposed amendment to LP:** omit Figure 6 and the reference to it.

**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?**

18. Policy D.DH6 is not supported by a robust evidence base. The Tower Hamlets Tall Buildings Study (‘the Study’) is referred to as the first ‘evidence link’ for D.DH6, and provides the only borough-specific evidence. It is referred to in paragraph 3.70 of the LP which says that it is to be read alongside the LP policy and provides detailed guidance. The February 2018 version is the latest version.

A number of aspects of the Study do not provide a robust evidence base. Some of these have led to problems with the wording of D.DH6 and the associated explanation and these are addressed above under question 8.4, leading to the changes the LP proposed above.

Set out below are comments on more detailed aspects of the Study which will be important in development management, as the Study is put forward as guidance in support of D.DH6 and we do not consider that it provides a sound basis for development management.

***Tower Hamlets Tall Buildings Study (February 2018)***

19. The Study lacks a positive vision. The emphasis is on constraining development, and trying to mitigate what are seen as inherently negative consequences arising from tall buildings. The Study pays little attention to the way in which clusters such as Canary Wharf have developed and are developing in practice, and how they will need to develop to maintain their roles. As a result, the strategy is over-theoretical, negative, backwards looking and overly prescriptive.
20. The consideration of Canary Wharf in the Study is based on an outdated idea of the area and its character. A theoretical model of development form is promoted that is at odds with reality as demonstrated in the Figures appended to this Hearing Statement. The Study is correct to identify One Canada Square as an important focal point, but there is no attempt to suggest what its role could be in the context of an expanding cluster that will soon include several buildings that are of a similar height to it, and with many more such buildings consented – figures 2 to 5 show the reality. As a result, the emphasis is on attempting to retrospectively maintain the centrality of One Canada Square and enforce a rigid stepping down in heights from it - a situation which in practice is already in the process of being superseded by several extant planning consents and emerging proposals.

### *Detailed comments*

#### Section 5.5

21. Few of the problems ascribed to tall buildings in section 5.5, p74 – e.g. impacting on the quality of the public realm, undermining the character of a place etc – are specific to tall buildings. Such issues can be dealt with through good design, whether the building in question is tall or not, although this is not recognised in the text.
22. It is not exclusively a tall building phenomenon for homes to be sold off plan to foreign investors or to be lying empty (p74) – this is likely a function of the prime location of many tall buildings, rather than their height.
23. It is not clear what the justification is for the assertion that ‘Public opposition to a tall building, specifically within the wider context of established residential areas is likely to increase in the future.’ The purpose of the critique of tall buildings in general is also unclear in a document which has been prepared to identify appropriate, inappropriate and sensitive locations for tall buildings; and to provide guidance on the height and form of potential tall buildings (page 8).

#### Section 5.6.1 and 5.6.2

24. While the potential problems of tall buildings in historic environment are highlighted, there is little acknowledgement of the potential for a well-designed tall building and/or cluster to sit comfortably within historic environments, and even to create dramatic contrasts to the benefit of both – the London View Management Framework (LVMF) view from Greenwich is an example of the latter, acknowledged as such in the text of the LVMF.

#### Section 5.7

25. The Study should have acknowledged that London’s city image is distinct from that of other global cities such as Paris at one extreme or New York/ Tokyo at the other, in its mixing of the old and the new (including tall buildings), often side by side. This is recognised by many as a positive aspect of twenty-first century London.

#### Section 6.12

26. This section rightly acknowledges that Canary Wharf is one of the world’s foremost financial centres, an area with high transport capacity (set to increase with the arrival of Crossrail at the North Dock), and a location with increasingly large leisure and shopping provision. The existing tall building cluster in Canary Wharf is a clear representation of the major centre located there, and it is an area that is clearly defined geographically by major infrastructure (e.g. Aspen Way / DLR lines to the north) and water bodies. Canary Wharf is itself the central part of a wider Isle of Dogs cluster, including tall buildings to the south and north-east.

27. The summary on p153 is vaguely worded, and it is not clear if it is advocating a strategy of stepping down within the Canary Wharf cluster itself, or in the areas beyond (the text in the rest of the document suggests the former). We see no reason to rigidly step down the heights of tall buildings within Canary Wharf, given that it is a centre of such major importance. Indeed, the extant North Quay scheme comprises building heights similar to the existing buildings around One Canada Square and therefore introduces no such step between the central and northern parts of Canary Wharf. It may well be appropriate for a general stepping down in height beyond Canary Wharf, within the wider Isle of Dogs cluster, and this is what has happened in practice.
28. Any strategy for Canary Wharf should not be overly prescriptive and should not ignore the way in which the cluster has already developed in practice, and how it is likely to develop in light of consented and under-construction schemes, as well as proposed schemes yet to be determined.
29. There is a focus on height in this summary to the exclusion of everything else – it ignores the fact that buildings within a cluster can be differentiated in ways other than height such as form, footprint, appearance, uses etc.

#### Section 7.4.4

30. Figure 7.2, Figure 7.4 and p204/205: Figure 7.2 is a section drawn through a specific place, but the p204 text (penultimate paragraph) and Figure 7.4 imply a general principle. As noted above, such a general principle is unrealistic.
31. Figure 7.5: modulation of height is desirable, but not necessarily within an overall 'stepping-down' strategy.
32. The first and second sentences in the first paragraph on p205, concerning the spacing of tall buildings, promote two principles that are very likely to be mutually exclusive.

#### *Conclusion*

33. A useful exercise for the Study to have undertaken would have been the modelling of consented and under-construction buildings across Canary Wharf and the Isle of Dogs cluster more generally, as shown in Figures 1-5. This would provide a clearer picture of the emerging situation, and could inform consideration of issues such as the role of One Canada Square within an expanded cluster, and the emerging patterns of development which are apparent in the Canary Wharf (and wider Isle of Dogs) cluster. While we are doubtful that attempting to shape the general pattern of development is appropriate or desirable, such a study would at least provide a sound basis on which to consider what guidance could be provided.
34. Examination of the 'cumulative' images in figures 1 to 5 reveals an extensively expanded cluster, with modulations in height, a number of focal points (some with a similar height to

One Canada Square), and a variety in the form and appearance of the tall buildings. To many eyes, this will seem as desirable an outcome as a rigidly controlled stepping down in height from a central point as advocated by this study – an approach that is questionable in principle, and already redundant in practice.

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## ***Appendix 1***

### ***List of figures***

Figure 1a. Diagrammatic views of the Canary Wharf cluster showing consented scheme for North Quay Site

Figure 1b. Diagrammatic views of the Canary Wharf cluster showing proposed scheme for North Quay Site

Figure 2a. LVMF view 5A.1 from Greenwich (south of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent.

Figure 3a. View from Stave Hill (west of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent.

Figure 4a. View from the Green Bridge at Mile End (north of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent.

Figure 5a. View from the Greenwich peninsula (west of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent.

Figure 6. Map of viewpoint locations



Figure 6. Map of viewpoint locations

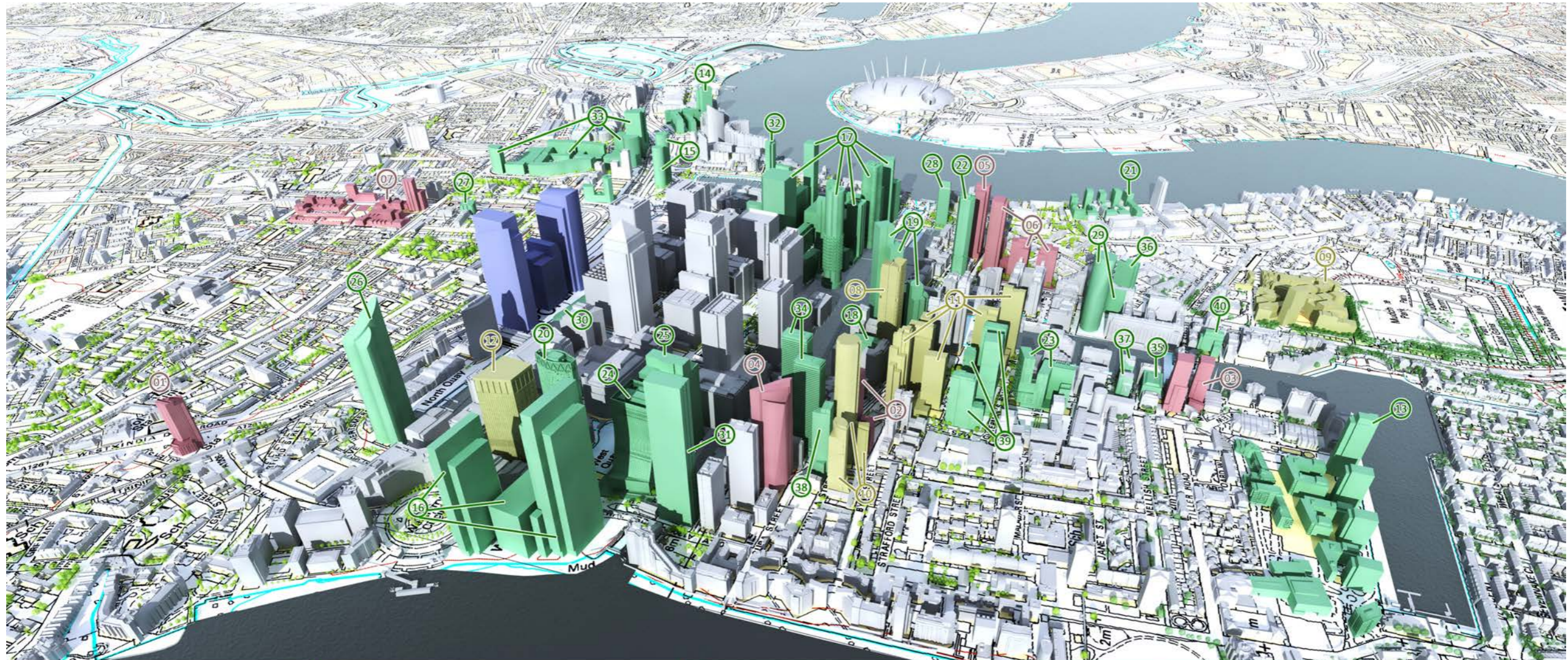
Site of Canary Wharf Group's North Quay project shown in red

Viewpoint 8: LVMF view 5A.1 from Greenwich (south of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent. (figure 2a)

Viewpoint 13: View from Stave Hill (west of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent. (figure 3a)

Viewpoint 20: View from the Green Bridge at Mile End (north of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent. (figure 4a)

Viewpoint 29: View from the Greenwich peninsula (west of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent. (figure 5a)



Submitted but not consented	Consented but not started	Completed or under construction	Completed or under construction
1. 82 West India Dock Road   PA/18/01203   Submitted, no decision yet	8. South Quay Plaza Phase 4   PA/15/03073   Decided, Permit	13. Westferry Printworks   PA/15/02216   Decided, External Decision - Approved	27. East India Dock Road   PA/13/01432   BUILT
2. 54 Marsh Wall   PA/16/01637   Unknown	9. ASDA East Ferry Road   PA/11/03670   Decided, Permit	14. Blackwall Reach Reuters Site   PA/10/01437   Decided, Permit	28. Dollar Bay   PA/11/01945   BUILT
3. 49-59 Millharbour   PA/16/03518   Refused, appeal lodged	10. Alpha Square   PA/15/02671   Decided	15. 2 Trafalgar Square   PA/14/01771   Decided, Permit	29. Crossharbour London Arena   PA/15/03076   BUILT
4. 30 Marsh Wall   PA/13/03161   Unknown	11. 3 Millharbour/6-8 South Quay Millharbour Village   PA/14/03195   Decided, Permit	16. Riverside South   PA/08/02249   Decided, Permit	30. Cross Rail   PA/08/01666   BUILT
5. 225 Marsh Wall   PA/16/02808   Refused, appeal lodged	12. 1 Parkplace   PA/13/02344   Decided, Permit	17. Wood Wharf   PA/13/02966   Under construction	31. City Pride   PA/15/02027/NC   Under construction
6. SkylineVillage   PA/17/01597/A1   Registered		18. South Quay Square   PA/15/02104   Under construction	32. CarPark Prestons Rd Yabsley St   PA/12/02107   Under construction
7. Chrisp Street Market   PA/16/01612   Registered		19. South Quay Plaza Phase 1 2 and 3   PA/15/03074/A2   Under construction	33. Blackwall Reach Robin Hood Gardens   PA/12/00001   Under construction
		20. NFL   PA/15/00630   Under construction	34. Arrowhead Quay   PA/16/00139   Under construction
		21. New Union Close   PA/12/00360   Under Construction	35. Archway House/47 Millharbour   PA/17/00411   Under Construction
		22. Meridian gate   PA/14/01428   Construction just started	36. 7 Limeharbour   PA/15/01502/A2   Under construction
		23. Indecon Court/20 Millharbour   PA/13/01309   BUILT	37. 45 Millharbour   PA/16/00574   BUILT
		24. 1 Bank St   PA/15/03266   Under construction	38. 40 Marshwall   PA/10/01049   BUILT
		25. Heron Quays West 1/10 Bank St   PA/16/02956   Construction just started	39. 2 Millharbour   PA/16/02336/A2   Under construction
		26. Hertsmere House   PA/15/02675   Under construction	40. 1-3 Turnberry Quay   PA/12/02923   BUILT

**KEY**

- North Quay Consented
- Submitted but not consented
- Consented but not started
- Completed or under construction

**Cumulative schemes list**

Figure 1a. Diagrammatic views of the Canary Wharf cluster showing consented scheme for North Quay Site



Submitted but not consented	Consented but not started	Completed or under construction	Completed or under construction
1. 82 West India Dock Road   PA/18/01203   Submitted, no decision yet	8. South Quay Plaza Phase 4   PA/15/03073   Decided, Permit	13. Westferry Printworks   PA/15/02216   Decided, External Decision - Approved	27. East India Dock Road   PA/13/01432   BUILT
2. 54 Marsh Wall   PA/16/01637   Unknown	9. ASDA East Ferry Road   PA/11/03670   Decided, Permit	14. Blackwall Reach Reuters Site   PA/10/01437   Decided, Permit	28. Dollar Bay   PA/11/01945   BUILT
3. 49-59 Millharbour   PA/16/03518   Refused, appeal lodged	10. Alpha Square   PA/15/02671   Decided	15. 2 Trafalgar Square   PA/14/01771   Decided, Permit	29. Crossharbour London Arena   PA/15/03076   BUILT
4. 30 Marsh Wall   PA/13/03161   Unknown	11. 3 Millharbour/6-8 South Quay Millharbour Village   PA/14/03195   Decided, Permit	16. Riverside South   PA/08/02249   Decided, Permit	30. Cross Rail   PA/08/01666   BUILT
5. 225 Marsh Wall   PA/16/02808   Refused, appeal lodged	12. 1 Parkplace   PA/13/02344   Decided, Permit	17. Wood Wharf   PA/13/02966   Under construction	31. City Pride   PA/15/02027/NC   Under construction
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		20. NFL   PA/15/00630   Under construction	34. Arrowhead Quay   PA/16/00139   Under construction
		21. New Union Close   PA/12/00360   Under Construction	35. Archway House/47 Millharbour   PA/17/00411   Under Construction
		22. Meridian gate   PA/14/01428   Construction just started	36. 7 Limeharbour   PA/15/01502/A2   Under construction
		23. Indecon Court/20 Millharbour   PA/13/01309   BUILT	37. 45 Millharbour   PA/16/00574   BUILT
		24. 1 Bank St   PA/15/03266   Under construction	38. 40 Marshwall   PA/10/01049   BUILT
		25. Heron Quays West 1/10 Bank St   PA/16/02956   Construction just started	39. 2 Millharbour   PA/16/02336/A2   Under construction
		26. Hertsmere House   PA/15/02675   Under construction	40. 1-3 Turnberry Quay   PA/12/02923   BUILT

**KEY**

- North Quay Proposal
- Submitted but not consented
- Consented but not started
- Completed or under construction

**Cumulative schemes list**

Figure 1b. Diagrammatic views of the Canary Wharf cluster showing proposed scheme for North Quay Site

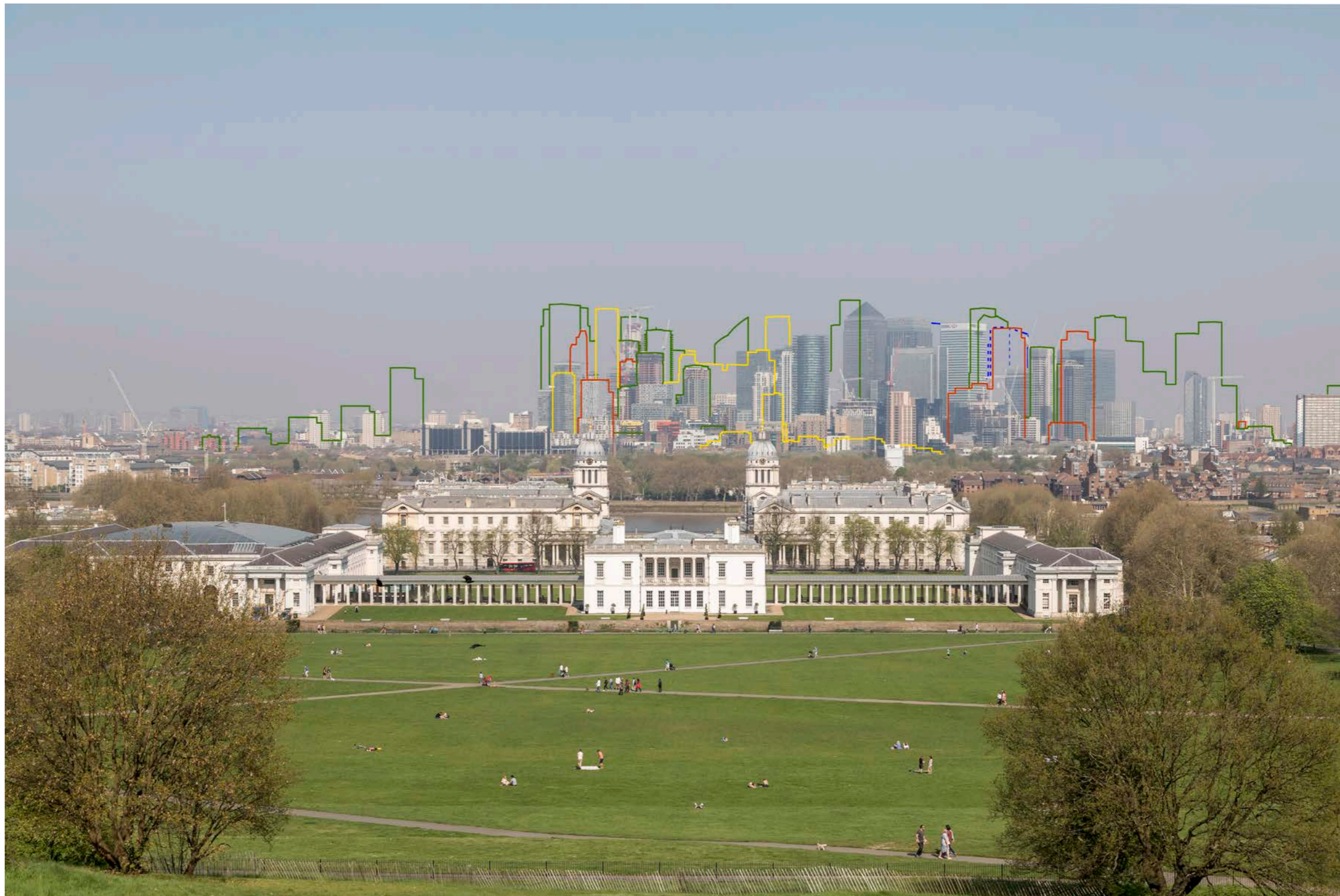


Figure 2a. LVMF view 5A.1 from Greenwich (south of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent.



Figure 3a. View from Stave Hill (west of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent.



Figure 4a. View from the Green Bridge at Mile End (north of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent.



Figure 5a. View from the Greenwich peninsula (west of Canary Wharf) showing of Canary Wharf cluster and schemes with planning consent.