

Examination of the London Borough of Tower Hamlets Local Plan

Schedule of Matters and Issues for the Examination

Matter 9, Issue 9

Representor ID: 624580/Canary Wharf Group Plc

27 July 2018

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

Matter 9: Retail, Markets and Community Facilities

Issue 9: Are the retail, markets and community facilities policies justified, deliverable and consistent with national policy? Response to the Inspectors Schedule of Matters and Issues, paragraphs 9.5 and 9.10.

9.10 The LP is inconsistent as to whether Canary Wharf is a higher order ‘Metropolitan Centre’ rather than a ‘Major Centre’, having regard to the Town Centre classifications in the London Plan. Policy S.SG1 defines it as a metropolitan centre (there is no definition in the glossary although 2.13 page 28 contradicts this). The retail chapter appears to define it as a major centre. The London Plan is clear that the Canary Wharf should develop as a metropolitan centre and indeed the draft London Plan classifies the centre as a metropolitan centre. How does the LP address this issue? If the intention is to support and facilitate this designation should this be acknowledged in the table at page 93 policy S.TC1?

1. The Draft London Plan allocates Canary Wharf as a Metropolitan Town Centre. Throughout the LBTH Local Plan consultation process, CWG have presented evidence to support this allocation, demonstrating that Canary Wharf is now fulfilling the role of a Metropolitan Centre in its current format and scale. Representations recommend the LBTH Local Plan positively recognises this performance and endorses its immediate step change to Metropolitan Centre status – consistent with the London Plan.
2. In response to the Regulation 19 Consultation, CWG endorsed Policy S.SG1 (p.26), and paragraphs 2.13 (p.26) and 6.9 (p.98), which clearly concur that Canary Wharf is already fulfilling the role of a Metropolitan Centre. Submitted representations did note, however, some absence of consistency with this policy position throughout the remainder of the draft Local Plan. We set out a series of clear recommendations to ensure the step change of Canary Wharf to Metropolitan Centre status is afforded sufficient policy weight in the LBTH Local Plan.
3. Subsequent to the Regulation 19 Consultation, CWG have been in dialogue with LBTH, jointly preparing a Statement of Common Ground to set out agreed amendments to the Local Plan, and which will not be the subject of dispute by either party. LBTH have – within the Statement of Common Ground – agreed to incorporate our suggested amendments, aside from that relating to Policy S.TC1. We detail the recommendations and where agreement has been reached, as follows:

R1: Paragraph 2.14, page 28 [agreed]

The final sentence of paragraph 2.14 (page 28) will be amended as:

~~These centres have been classified according to their existing roles and functions (see policy S.TC1) and each performs a different but complementary role.~~ ***The network and hierarchy of centres is set out in policy S.TC1, with each centre performing a different but complementary role.***

R2: Part 3: Policy S.TC1: Supporting the Network and Hierarchy of Centres, page 93 [dispute]

CWG recommended an amendment to the 'Functions/Roles' alongside Canary Wharf within Policy S.TC1 (table) as follows:

- Provide a high proportion of comparison retail compared to convenience along with leisure and civic uses.
- ***Endorse the re-designation of Canary Wharf to a Metropolitan Centre in accordance with its current function and role.***
- Continue to support its role as a key global employment centre.
- Improve local accessibility to Canary Wharf and its strategic transport interchange, and legibility and wayfinding across the area.

LBTH have rejected this recommendation and have instead made the following suggested amendment:

New text will be inserted after 'Major Centre' within policy S.TC1 (within the first column of the table), page .93, as follows:

- ***Major Centre (with potential to be reclassified as a Metropolitan Centre over the Local Plan period)***

The recommendation put forward by CWG is more consistent with the London Plan and wider policy position of the LBTH Local Plan as set out in S.SG1, paragraph 2.13 and 6.9, i.e. that Canary Wharf is ***already*** functioning as a Metropolitan Town Centre. Suggested wording by LBTH states only the 'potential' for reclassification, which is entirely inconsistent with the strength of policy support set out elsewhere in the Local Plan.

R3: Part 4, Vision for Isle of Dogs and South Poplar, page 217 [agreed]

The text box on pages 217-218 (at the beginning of paragraph 4) will be amended to make reference to Canary Wharf having achieved re-designation to a Metropolitan Centre status in the town centre hierarchy as follows:

Canary Wharf will achieve re-designation to a Metropolitan Centre in the town centre hierarchy.

R4: Delivering Sustainable Places, paragraph 5.6, page 221 [agreed]

Point 9 will be amended to read:

Support the re-designation of Canary Wharf to a Metropolitan Centre in the London Plan and promote the expansion of retail, leisure and complementary commercial employment provision to support its continued role as a higher order town centre.

R5: Section, Appendix 1: Glossary and Acronyms, page 272 [agreed]

A definition of a Metropolitan Centre will be inserted as follows:

Metropolitan Centres are designated through the London Plan. Canary Wharf has been identified as already fulfilling the role of a Metropolitan Centre because it serves a wide catchment which extends over several boroughs and into parts of the wider South-east region. It contains at least 100,000 square metres of retail, leisure and service floorspace with a significant proportion of higher-order comparison goods relative to convenience goods. Canary Wharf has very good accessibility and significant employment, service and leisure functions.

9.5 In relation to policy S.TC1 and table 4, the Council has provided a response to my initial query in relation to the retail floorspace requirements identified by the policy. The Council is requested to provide a detailed response to this point including the revised table which it has referred to in its letter of 15 May 2018.

4. In order to clarify the policy framework in respect of retail floorspace requirements, the following amendments to the Local Plan have been agreed in the Statement of Common Ground:

A1: Table 4, page 99 [agreed]

Two new paragraphs will be inserted immediately after Table 4, page 99, clarifying the context of the baseline need figures as set out in the Town Centre Retail Capacity Study:

“6.17. The level of need for retail floorspace set out in table 4 is based on a constant market share approach over the plan period. It takes into account the impact of committed development, which is why some town centres do not have any floorspace capacity in the comparison retail sector as a result of the growth potential in these areas, particularly in Canary Wharf.

6.18 These figures, however, should not represent a ceiling to new development. New floorspace and investment may enhance the profile of a town centre, helping to claw back expenditure, and increase market share and trade retention. Furthermore, there is still no certainty that committed development will come forward as planned in the short term, highlighting the importance of ensuring these figures are kept under review throughout the plan period.

A2: Paragraph 6.17, page 99 [agreed]

Amended to remove retail demand test when assessing planning applications; this is not consistent with the retail tests set out in the NPPF.

~~6.17 Where new retail or leisure floorspace is proposed beyond those figures, the applicant will be expected to demonstrate that a demand does exist for such floorspace and that it would not detrimentally harm the viability and vitality of existing floorspace in the centre and nearby town centres (see part 2).~~

A3: Isle of Dogs and South Poplar development potential, paragraph 5.5, page 220 [agreed]

The footnote will be amended to provide explanation and clarification in the context of Table 4, page 99:

~~Development potential figures are derived from the housing trajectory (see appendix 7), the Employment Land Review and the Town Centre Retail Capacity Study (which assessed the capacity of Canary Wharf and Crossharbour town centres). Note: Retail capacity figures include committed development and do not represent a ceiling on new development (see chapter 6, section 3). Please note: the housing target represents a cautious estimate of the Tower Hamlets housing land supply position in relation to the London Plan target and the objectively assessed needs identified through the Tower Hamlets Strategic Housing Market Assessment (2017). The employment and retail capacity figures derive from the Tower Hamlets Employment Land Review (2016) and the Tower Hamlets Town Centre Strategy (2017-2022). The strategy assessed Canary Wharf and Crossharbour town centres for retail capacity in comparison and convenience. The required infrastructure has been identified in the Tower Hamlets Infrastructure Delivery Plan. Provision will be sought through the site allocations.~~