# **Tower Hamlets Local Plan Topic Paper: Views & Landmarks**

# 1 Introduction & background

This section will cover the purpose of the topic paper, what it covers and the process it has followed.

#### 1.1 Introduction to the Local Plan

The new Local Plan is a key strategic document which will set the framework for the future development and growth of Tower Hamlets over the period from 2016 to 2031.

The draft Tower Hamlets Local Plan went out to consultation over a period of 6 weeks from Monday 2 October 2017 and to Monday 12 November 2017 (known as the regulation 19 stage). The regulation 19 version of the Local Plan (along with relevant supporting documents and the representations) can be found from the examination library page on our website via the following link:

https://www.towerhamlets.gov.uk/lgnl/council\_and\_democracy/consultations/past\_consultations/Lo cal\_Plan.aspx.

#### 1.2 Role & purpose

This topic paper has been produced to accompany the submission of the Local Plan to the secretary of state before it undergoes a public examination. It will:

- Provide more detail and explanation about how we have arrived at our approach and the assumptions and information we have used that underpin that approach.
- Respond to representations received during the regulation 19 consultation.

#### 1.3 Scope

This paper covers the following topics:

- Inventory of views and landmarks identified in conservation area appraisals and management plans.
- Identification of elements of the borough's townscape elements which are present in London Views Management Framework.
- Justification for designations of borough views and borough landmarks.

# 2 Legislative & policy context

This section will set out the context in which the policies in the Local Plan have been developed.

#### 2.1 National planning policy and guidance

#### 2.1.1 National Planning Policy Framework (2012)

- The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework for England.
- Our policies must be positively prepared, justified, effective and consistent with national policy. Local Plans should be consistent with national policy as set out in the NPPF, and should have regard to national planning guidance set out in the National Planning Practice Guidance which supports the NPPF.
- The NPPF recognises visual impact of developments on local character and significance of heritage assets.

#### Key relevant paragraphs:

**58.** Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.

Planning policies and decisions should aim to ensure that developments:

- (...)
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- (...)
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- (...)
- are visually attractive as a result of good architecture and appropriate landscaping.

**132.** When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. (...) Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. (...)

#### 2.1.2 The Setting of Heritage Assets (2017)

Guidance provided by Historic England identifies the need for assessment and management of views in the planning process. Views are considered as intrinsic to local character in general, not only in relation to heritage assets.

The guidance notes that views may be identified and protected by local planning policies and guidance for the part they play in shaping our appreciation and understanding of England's historic environment. Types of view identified for this purpose include:

- Views identified as part of the plan-making process, such as those identified in the London View Management Framework.
- Views identified in character appraisals and management plans.
- Views that are identified by local planning authorities when assessing development proposals.

Policy D.DH4 is structured on these categories of views.

#### Key relevant paragraphs:

**10** The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

**13** Views may be identified and protected by local planning policies and guidance for the part they play in shaping our appreciation and understanding of England's historic environment, whether in rural or urban areas and whether designed to be seen as a unity or as the cumulative result of a long process of development. This does not mean that additional views or other elements or attributes of setting do not merit consideration. Such views include:

- views identified as part of the plan-making process, such as those identified in the London View Management Framework (LVMF, Mayor of London 2010) and Oxford City Council's View Cones (2005) and Assessment of the Oxford View Cones (2015 Report)
- views identified in character area appraisals or in management plans, for example of World Heritage Sites
- important designed views from, to and within historic parks and gardens that have been identified as part of the evidence base for development plans, and

 views that are identified by local planning authorities when assessing development proposals

Where complex issues involving views come into play in the assessment of such views – whether for the purposes of providing a baseline for plan-making or for development management – a formal views analysis may be merited.

**6** (...) The assessment and management of views in the planning process may therefore be partly or wholly separate from any consideration of the significance of heritage assets. (...).

### 2.2 London Plan and Supplementary Planning Guidance

#### 2.2.1 Current adopted London Plan

London Plan recognises the importance of views as an element of local character and refers to them in relation to:

- 1. Environment and heritage of Central Activities Zone
- 2. Location of tall buildings
- 3. Heritage led regeneration
- 4. London View Management Framework
- 5. Designation of local views and landmarks by London Boroughs

London Plan policies ensure that new developments not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements.

Key relevant policies:

POLICY 2.10 CENTRAL ACTIVITIES ZONE – STRATEGIC PRIORITIES

A The Mayor will, and boroughs and other relevant strategic partners should:

(...)

**d** sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components such as: (...) designated views and more local features (...) through high quality design and urban management.

POLICY 7.7 LOCATION AND DESIGN OF TALL AND LARGE BUILDINGS

D Tall buildings:

(...)

**b** should not impact on local or strategic views adversely.

#### POLICY 7.9 HERITAGE-LED REGENERATION

**A** Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes (...) views (...).

#### POLICY 7.11 LONDON VIEW MANAGEMENT FRAMEWORK

**A** The Mayor has designated a list of strategic views (Table 7.1) that he will keep under review. (...)

Development will be assessed for its impact on the designated view if it falls within the foreground, middle ground or background of that view.

**B** Within the designated views the Mayor will identify landmarks that make aesthetic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.

(...)

**D** The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and to appreciate a World Heritage Site's authenticity, integrity, significance and Outstanding Universal Value.

(...)

## POLICY 7.12 IMPLEMENTING THE LONDON VIEW MANAGEMENT

#### FRAMEWORK

**A** New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate strategically important landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.

(...)

**D** In addition to the above, new development in designated views should comply with the following:

London Panoramas – should be managed so that development fits within the prevailing pattern of buildings and spaces and should not detract from the panorama as a whole. The management of views containing strategically important landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the strategically important landmark in the foreground, middle ground or background where appropriate.

River Prospects – views should be managed to ensure that the juxtaposition between elements, including the river frontages and key landmarks, can be appreciated within their wider London context.

(...)

**J** Boroughs should reflect the principles of this policy and include all designated views, including the protected vistas, into their Local Development Frameworks. Boroughs may also wish to use the principles of this policy for the designation and management of local views.

#### 2.2.2 Draft London Plan

The emerging new London Plan encourages boroughs to designate local views and landmarks in recognition of their contribution to local character and sense of place. Protection given to the London Views Management Framework remains in place.

#### Key relevant policies:

#### POLICY HC3 STRATEGIC AND LOCAL VIEWS

- (...)
- F. Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.
- G. Boroughs should clearly identify important local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

#### POLICY HC4 LONDON VIEW MANAGEMENT FRAMEWORK

#### POLICY D8 TALL BUILDINGS

Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:

(...)

**B** Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of:

**1)** the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below)

(...)

**C** The impacts of a tall building can be visual, functional or environmental. All three elements should be considered within plan-making and in deciding development proposals:

1) Visual impacts

a) The views of buildings from different distances need to be considered, including:

- i. Long-range views these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views
- ii. Mid-range views from the surrounding neighbourhood particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality
- iii. Immediate views from the surrounding streets attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

**b)** Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding

(...)

**d)** Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

*e)* Buildings in the setting of a World Heritage Site must preserve the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it

**f)** Buildings near the River Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river (...).

4) Cumulative impacts

**a)** The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. (...)

#### 2.2.3 Other relevant policy guidance

#### London View Management Framework Supplementary Planning Guidance (March 2012)

The LVMF provides detailed guidance for protection of London wide visual assets, including methodology and terminology associated with assessment of views.

#### Maritime Greenwich Site Management Plan (2014)

The management plan provides a framework for safeguarding the Maritime Greenwich World Heritage Site. It states that opportunity should be taken in the preparation of local planning policy to reflect the outstanding universal value of the world heritage site and its setting, including the buffer zone. It also states that important views in and out of the world heritage site should be identified and the setting of the site protected against the adverse impact of new development.

#### Tower of London World Heritage Site Management Plan (2016)

The management plan provides a framework for safeguarding the Tower of London World Heritage Site. A key objective of the plan is to preserve and enhance the local and wider setting of the world heritage site. This includes ensuring that local planning policy provides a complementary, detailed planning policy framework capable of managing the outstanding universal value of the tower and its setting.

#### 2.3 Local context

#### Conservation area appraisals and management guidelines

The council has adopted conservation area appraisal and management guidelines for each of the borough's conservation areas. These documents were adopted as interim planning guidance in the period between 2007 and 2009. Each of the appraisals considers views and the contribution that they make to the special character of the conservation area.

#### Tower Hamlets' Waterspace Study (2017)

This study identifies long views across water space as an important element of local character, identity of places and their relationship with London.

#### Tower Hamlets' Conservation Strategy (2017)

The strategy identifies views as undesignated heritage assets and recognises the importance of views and visual relationships (within, into and out of Tower Hamlets) as important part of both heritage and modern experience of the borough. One of the strategic objectives aims to ensure effective protection of the setting of heritage assets and key views from inappropriate development (objective 2.10). The proposed action is to identify locally designated views, strategic views and protected vistas which contribute to the identity and distinctiveness of places in Tower Hamlets and within London.

#### Tower Hamlets' Tall Building Study (2017)

The study recognises that due to their massing and height, tall buildings can intrude into, or detract from, important views, prospects or panoramas. It also identifies that tall buildings can have a detrimental impact on existing local landmarks, for example by competing with them, detracting from views or undermining their presence. It states that in order to protect or enhance local views the coordination of any new taller buildings as distinct landmarks, for example to enhance vistas; the grouping of taller buildings in distinct and recognisable clusters; or the protection of existing views to local or city landmarks from harmful intrusion by tall buildings.

## 3 Local Plan policy approach

This section will set out how the Local Plan policies on views respond to the requirements of national and regional policy and the results of our evidence and considers the responses put forward during regulation 19 consultation.

#### 3.1 National planning policy and guidance

#### 3.1.1 National Planning Policy Framework (2012)

Policy D.DH4 of the Local Plan (managing and shaping views) helps to articulate the quality that is expected of new development, as required by paragraph 58 of the NPPF. In particular, it will help to ensure that development establishes a strong sense of place, responds to local character and history, and is visually attractive as a result of good architecture.

Policy D.DH4 also helps to place appropriate weight on the conservation of the setting of certain heritage assets, as required by paragraph 132.

#### 3.1.2 The Setting of Heritage Assets (2017)

Policy D.DH4 reflects on Historic England's guidance by identifying types of view that play a part in shaping our appreciation and understanding of England's historic environment.

#### 3.2 **Regional context**

#### 3.2.1 **Current adopted London Plan**

Policy D.DH4 responds to the relevant London Plan policies by embedding the LVMF in local policy and by using the LVMF policy principles to designate and manage local views.

#### 3.2.2 Draft London Plan (2017)

Policy D.DH4 is aligned with the emerging new London Plan which encourages boroughs to designate local views and landmarks in recognition of their contribution to local character and sense of place.

#### 3.2.3 London View Management Framework Supplementary Planning Guidance (2012)

The Tower Hamlet's Local Plan directly adopts the simplified terminology of the London View Management Framework SPG (figure 1).



Figure 1 Policy D.DH4 terminology

**VIEWING PLACE** 

The London View Management Framework Supplementary Planning Guidance identifies the silhouette of Canary Wharf as a recognisable feature in numerous panoramic views of London (figures 2 to 8). The group of tall buildings around Canary Wharf that form a distinctive cluster, which is visible across London and have become a globally recognised silhouette. The distinctive skyline of the cluster is also a prominent and recognisable feature in views from the surrounding areas. As such, Canary Wharf's skyline is considered to have regional importance to London, as

well as being a defining feature of Tower Hamlets' distinctive local character. The Local Plan responds to this by designating Canary Wharf as a "Skyline of Strategic Importance" and requiring the management of its setting. The key objective is to preserve the distinctiveness of Canary Wharf in the regional landscape.

LVMF views that recognise the "Skyline of Strategic Importance"		
LVMF 1A	Alexandra Palace (figure 2)	
LVMF 2A	Parliament Hill (figure 3)	
LVMF 4A	Primrose Hill: the summit (figure 4)	
LVMF 5A	Greenwich Park: The General Wolfe Statue (figure 5)	
LVMF 6A	Blackheath Point (figure 6)	
LVMF 11B	London Bridge (figure 7)	
LVMF 15B	Waterloo Bridge (figure 8)	



Figure 2 LVMF London Panorama from Alexandra Palace (LVMF 1A)



Figure 3 LVMF London Panorama from Parliament Hill (LVMF 2A)



Figure 4 LVMF London Panorama from Primrose Hill (LVMF 4A)



Figure 5 LVMF London Panorama from Greenwich (LVMF 5A)



Figure 6 LVMF London Panorama from Blackheath Point (LVMF 6A)



Figure 7 LVMF London River Prospect from London Bridge (LVMF 11B)



Figure 8 London River Prospect from Waterloo Bridge (LVMF 15B)

#### 3.2.4 Maritime Greenwich World Heritage Site Management Plan

Policy D.DH4 requires development proposals to demonstrate how they comply with the Maritime Greenwich World Heritage Site Management Plan.

#### 3.2.5 Tower of London World Heritage Site Management Plan

Policy D.DH4 requires development proposals to demonstrate how they comply with the Tower of London World Heritage Site Management Plan.

#### 3.3 Local context

#### 3.3.1 Conservation area appraisals and management guidelines (2007 – 2009)

There are a total of 39 landmarks and 92 views identified in conservation area appraisals and management guidelines. They are considered intrinsic to the character of conservation areas, and as such require appropriate protection and management. Eleven conservation areas do not have any specific views or landmarks identified as they have a more enclosed character.

All identified views and landmarks were mapped and it was noted that some landmarks were seen from multiple conservation areas and they had a visual impact beyond the conservation area they were located in. These landmarks are proposed as "Borough Designated Landmarks".

Bor	ough Designated Landmark	Viewed from		
1L	Balfron Tower, Grade II* listed (figure 10). The 27-storey Balfron Tower is Goldfinger's first public housing project, and a precursor to his better known Trellick Tower in North Kensington. Considered to be exemplary examples of the post-war housing schemes, Balfron Tower and the neighbouring Carradale House were listed in 1998 for their cultural & architectural merit.	<ul> <li>Balfron Tower Conservation Area</li> <li>Lansbury Conservation Area</li> <li>Langdon Park Conservation Area</li> </ul>		
2L	Christ Church Spitalfields, grade I listed (figure 9). The Christ Church dominates its surroundings by the scale and monumentality of its architecture and the quality of its neo-classical white stone facades. The powerful, sculptural, unusual and iconic west façade forms the centrepiece of the view east along Brushfield Street, and is a major landmark to through traffic on Commercial Street, and is glimpsed from many parts of the conservation area and beyond. The church has historic significance as a grand architectural gesture to re-establish the Church of England in an area which has traditionally been the home of many other faiths. Today, it is acknowledged as one of the most significant Baroque churches in Europe.	<ul> <li>Brick Lane and Fournier Street Conservation Area</li> <li>Artillery Passage Conservation Area</li> </ul>		
3L	St Anne's Church, grade I listed (figure 11). Credited as one of Hawkmoor's six great east London churches, St Anne's Church in Limehouse is ecclesiastical grade I listed. The historic St Anne's churchyard contains mature trees, the grade II listed war memorial and a number of graves. St Anne's Church has formed a landmark in this part of the borough since its construction. Its prominence has been secured by a significant group of listed buildings and the respectful low scale and urban	<ul> <li>St Anne's Church conservation area</li> <li>Regent's Canal conservation area</li> <li>Narrow Street conservation area</li> </ul>		

	character of the historic development which surrounds the		
	church.		
4L	St Paul's Church, grade II* listed (figure 12).	•	Wapping Wall
			conservation area
	The rapid growth of Shadwell between 1630 and 1650	•	St Paul's Shadwell
	brought with it a need for its own place of worship. In		conservation area
	1656, a Chapel-of-Ease was constructed to service its	-	St George in the East
	8,000 inhabitants, many of whom were mariners,		conservation area
	watermen and lightermen. In 1664, the building was		
	altered when the progressive speculator Thomas Neale		
	inherited an interest in Shadwell. This was later		
	reconstructed as St Paul's Church in 1669, as a result of a		
	community petition to Parliament calling for the creation of		
	a new parish. When established the following year,		
	Shadwell became the first parish to be created from St		
	Dunstan's Stepney since Whitechapel in 1338. Named		
	after St Paul's Cathedral, the church was consecrated on		
	the 12th March 1671. St Paul's Church survived the blitz		
	with only minor damage, but all parish records were		
	destroyed.		



Figure 9 Christ Church, Spitalfields



Figure 10 Balfron Tower





Figure 11 St Anne's Church

Figure 12 St Paul's Church

The conservation area appraisals and management guidelines have also enabled the identification of "Borough Designated Views". These are views intrinsic to the special character of conservation areas, covering multiple conservation areas. These are views in which the borough "Designated Landmarks" and other landmarks or "Skyline of Strategic Importance" can be seen.

Borough Designated View		Townscape elements within the view	
1V	View from Brushfield Street to Christ Church	-	Christ Church
	Spitalfields.		Spitalfields, grade I
			listed (Brick Lane and
	The townscape view along Brushfield Street towards the		Fournier Street
	west front of Christ Church Spitalfields is one of the most		conservation area)
	significant pieces of townscape in the borough. The	•	Townscape of Artillery
	façade of Christ Church Spitalfields commands the view,		Passage conservation
	and attracts people towards it along Brushfield Street.		area
	This low-rise character emphasizes the landmark value		
	of Christ Church Spitalfields, whose spire towers over		
	the area at a height of 225ft. It acts as focal points for		
	views and the important point of reference, making it		
	easier for visitors to find their way around.		

		1	
2V	View from the Wapping Wall bridge at the entrance	•	St Paul's Church,
	to the Shadwell Basin.		Grade II* Listed
			(St Paul's Shadwell
	Panoramic views towards the Conservation Area from		Conservation Area)
	Shadwell Basin exist along locks that once separated	•	St George in The East
	Shadwell from the Eastern Basin to the west and the		Church, Ecclesiastical
	river to the east. Projecting above the tree canopy of the		Grade A (I) Listed
	churchyard, the Baroque spire of St Paul's Church	•	London Hydraulic
	provides an enduring local and historical landmark. This		Power Co Pumping
	focal point is now surrounded by 20th century housing		Station, Grade II*
	development and the church itself forms a dramatic		Listed
	backdrop to the redeveloped Shadwell Basin.	•	This viewing point
			covers also views in
	The Wapping Wall street corridor opens out as it curves		the opposite direction,
	around the boundary wall of Wapping Pumping Station		towards Canary Wharf
	onto Garnet Street. The view to the north is framed by		(Skyline of Strategic
	the restored iron bascule bridge. To the south, the		Importance)
	Prospect of Whitby pub steps down in height to expose		
	an open sky at the riverside entrance to the Thames		
	walk. The Shadwell Basin provides a clear space over		
	which the historic church spires of St Paul's and St		
	George in the East can be viewed.		

3V	View from the bridge over the Regent's Canal on	•	St Anne's Church,
	Ben Johnson Road to St Anne's Church & Canary		grade I Listed (St
	Wharf in the background.		Anne's Church
			conservation area)
	The view from the bridge over Regent's Canal (Victory	•	The former London to
	Bridge) exposes layers of historic development		Blackwall Extension
	associated with the industrial heritage of the canal,		Railway Viaduct of
	architectural masterpiece of St Anne's Church and the		1847-49 with its 1876
	20 <sup>th</sup> century image of the Skyline of Strategic Importance		bridge over the canal
	of Canary Wharf. Walking south along Regent's Canal		(Regent's Canal
	the views of Canary Wharf rising in the distance are		conservation area)
	astounding. Especially south of Victory Bridge (on Ben	•	Canary Wharf (Skyline
	Johnson Road) where Canary Wharf is seen with the		of Strategic
	red-brick sewer vent shaft (built next to the towpath		Importance)
	C1906 to ventilate the Northern Low Level No.2 Sewer		
	and the Limekiln Dock Inversion Sewer), and the former		
	London to Blackwall Extension Railway Viaduct of 1847-		
	49 with its 1876 bridge over the canal.		
	Hawkmoor's St Anne's Church - the most significant built		
	landmark and historic focal point in Limehouse. Its		
	prominent tower projects above the tree canopy of the		
	churchyard and is visible from a considerable distance		
	and was designed to be visible by ships in the local		
	docks and from the River Thames. Ensuring an		
	appropriate scale for developments within and adjacent		
	to the conservation area will be critical to protect the		
	prominence of St Anne's Church in views across and		
	within the conservation area.		

4V	View from Salmon Lane to St Anne's Church & Canary	•	St Anne's Church,
	Wharf in the background.		grade I listed
			(St Anne's Church
	Hawkmoor's St Anne's Church is the most significant built		conservation area)
	landmark and historic focal point in and visual marker in	•	Limehouse Town Hall,
	Limehouse. Its prominent tower projects above the tree		Commercial Road,
	canopy of the churchyard and is visible from a		grade II* Listed
	considerable distance. Grade II listed buildings such as		(St Anne's Church
	the Limehouse Town Hall and Library and features		conservation area)
	Nicholas Hawkmoor's St Anne's Church, Limehouse	•	Canary Wharf
	(ecclesiastical grade A listed). The view down Salmon		(Skyline of Strategic
	Lane exposes their historic beauty on the background of		Importance)
	striking skyline of Canary Wharf.		
5V	View from Langdon Park to Balfron Tower & Canary		Balfron Tower, Grade
5V	View from Langdon Park to Balfron Tower & Canary Wharf in the background.	•	Balfron Tower, Grade
5V		•	
5V		•	II* Listed (Balfron
5V	Wharf in the background.	•	II* Listed (Balfron Tower conservation
5V	Wharf in the background. The key vistas from Langdon Park include Balfron Tower		II* Listed (Balfron Tower conservation area)
5V	Wharf in the background. The key vistas from Langdon Park include Balfron Tower and Carradale House, and striking panoramas across the		II* Listed (Balfron Tower conservation area) St Michael's Church,
5V	Wharf in the background. The key vistas from Langdon Park include Balfron Tower and Carradale House, and striking panoramas across the borough, with the Skyline of Strategic Importance at		II* Listed (Balfron Tower conservation area) St Michael's Church, grade II* Listed
5V	Wharf in the background. The key vistas from Langdon Park include Balfron Tower and Carradale House, and striking panoramas across the borough, with the Skyline of Strategic Importance at		II* Listed (Balfron Tower conservation area) St Michael's Church, grade II* Listed (Langdon Park
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6V	View from East India Dock Road to Balfron Tower &	-	Balfron Tower, grade
	Canary Wharf in the background.		II* listed (Balfron
			Tower conservation
	The tower blocks are clearly visible from East India Dock		area)
	Road, and have long been considered landmark buildings	•	All Saints Church,
	in London's East End. The dynamic panorama at the		grade II* listed (All
	eastern entrance to the borough is marked by three main		Saint conservation
	focal point marking historic milestones: All Saints Church		area)
	marking the rapid urbanisation and industrialisation of	•	Canary Wharf
	Poplar in the 19 <sup>th</sup> century, Balfron Tower exemplifying		(Skyline of Strategic
	post war housing regeneration and changing skyline of		Importance)
	Canary Wharf which drove London to the twenty first		
	century.		

#### 3.3.2 Conservation Strategy (2017)

This strategy outlines the need for the update of the conservation area appraisals and management guidelines. Mapping of all views and landmarks listed in existing documents is a part of preparatory work for this long term programme. There is a need, however, for an in-depth review of the appraisals and for search for potential other important views in the borough which could require protection. The assumption is that, given the relatively flat landscape of the borough, it is unlikely that further views of borough importance would be identified, it may, however, alter the list of local ones, which are given the protection in points d) and f) set out in policy D.DH4.

#### 3.3.3 Waterspace Study (2017)

This study identified the importance of water space as an open space in the townscape. The policy D.DH4 protects and encourages widening the positive impact of waterspaces in point e), which refers to preservation and enhancement of visual connections of the public realm with water spaces.

#### 3.3.4 Tall Buildings Study (2017)

This study identifies a number of Tall Building Zones in the plan. They are and will be important contributors to the borough's skyline and are recognised in the wider context of London. Policy D.DH4 b) in conjunction with policy D.DH6 (Tall buildings) strengthens the prominence and importance of the major tall buildings cluster at Canary Wharf by designation of the "Skyline of Strategic Importance" but also by requirements posed on other tall building zones to significantly step down in height in relation to Canary Wharf and to maintain spatial separation in the majority of cases.

# 4. How feedback received from the regulation 19 consultation have been taken into account in the draft Local Plan

This section will summarise the feedback from the regulation 19 consultation and how these comments have been taken into account.

This topic paper has been prepared in response to a number of representations relating to the regulation 19 consultation on the Local Plan. In the light of these representations, we have proposed further alterations to the draft policies, supporting text and justification.

These changes are relatively minor in nature and designed to improve the readability and clarity of the policies or provide further detail, where appropriate. The main changes in relation to the above policies are as follows.

Key issues in relation to D.DH4	Representation	Response
Proposals for tall buildings should take into account colour in relation to impact on LVMF views	Statutory consultee	It is proposed to insert additional supporting text in paragraph 3.47 of D.DH4 to ensure the appropriate use of palette and texture in tall building design (minor modification).
Clarification of designation of Skyline of Strategic Importance	Developers	This paper provides further details regarding the impact of the Canary Wharf skyline on LVMF views in order to provide context to this new designation in the Local Plan

Provide further justification of how borough-designated views and landmarks, and townscape and other local views have been identified.	Developers	As explained in this topic paper, borough-designated views and landmarks have been identified through the conservation area character appraisals and management guidelines. Townscape and other local views will be identified on a case-by- case basis through the development management process. A minor modification is proposed to the supporting text to D.DH4 to clarify this.
Weighting of views in relation to policy hierarchy	Developers	The LVMF and WHS management plans are referred to in part a) of the policy, with other view designations following on from this. This is consistent with the hierarchy of policy designations.
Consideration of how existing views will be impacted by consented but unbuilt development	Developers	Supporting text to tall buildings policy D.DH6 will clarify that the cumulative impact of proposals with valid planning permission will need to be considered when developing proposals (minor modification).
Wording of criteria in policy D.DH4 for assessment of proposals on identified views is overly-restrictive	Developers	Wording of policy is consistent with guidance (including London Plan policy 7.4).

#### 5. Next steps

The Tower Hamlets Local Plan (along with the representations from the last consultation and other relevant supporting documents) was submitted to the secretary of state for independent examination on 28 February 2018, following approval by Tower Hamlets Full Council.

The hearing sessions that are expected to take place in the spring/summer of 2018 will provide representatives from the council and developers, organisations and residents with an opportunity to discuss the issues raised through the representations with the appointed inspector.