



Local Plan Evidence Base

Tall Buildings

February 2017

1 Introduction

- 1.1 This report has been produced to provide an evidence base for the Local Plan Review in respect of the tall buildings policy for the London Borough of Newham.
- 1.2 Tall buildings are defined in both the London Plan and the Local Plan as those that are noticeably taller than their immediate surroundings, and/or have a significant impact on the skyline.
- 1.3 There is a widespread impression that Policy SP4 'Tall Buildings' in the current local plan is not adequately controlling tall buildings. This is part of the wider debate which has opened in recent years concerning the notable increase in planning permissions across all parts of London for tall buildings.
- 1.4 This study aims to examine the effectiveness of current planning policy for tall buildings in Newham and establish if there is in fact a policy deficit, and if so how it may be remedied.

2 Issues with tall buildings

- 2.1 The current Local Plan: Core Strategy notes that prior to its adoption, tall buildings in Newham had been constructed without strategic direction, tending to accentuate their negatives and undermine the coherence of places despite some positive aspects.
- 2.2 It is worthwhile to consider the positive aspects of tall buildings which make them an attractive development from several perspectives. In the right place well-designed tall buildings can make a positive contribution to urban life. Tall buildings can be excellent works of architecture, and some of the best post-war examples are now statutorily listed.
- 2.3 Further potential benefits are accommodating new homes and employment-generating uses/community facilities in an intensely used and vibrant development that activates the surrounding area. Well-designed tall buildings can provide an inclusive environment, both internally and externally by providing safe and pleasant public realm, taking opportunities to offer improved permeability, accessibility and, where appropriate, the opening up or effective closure of views to improve the legibility of the wider townscape.
- 2.4 Tall buildings can be a development that, by being viable for developers, and significantly increasing the customer base and footfall (including public transport patronage) encourage the regeneration and further investment in places. The introduction of a prominent visual feature into an existing townscape can change its character and appearance and present a better perceived 'offer' for the area to the rest of the borough and London, also helping to improve legibility by marking for instance, town centres and transport hubs. Tall buildings can thus play a role in creating successful places.

- 2.5 The pitfalls are that a tall building may create an isolated mono-community with little social interaction within the building and with the wider community in the area. The economics of building a taller building with its higher service charges may not necessarily optimise the housing opportunities available to residents in the borough.
- 2.6 This leads to the question of who lives in tall buildings and how this may change in the future. As well as high service costs, daylighting, adequate ventilation and wind sway effects to balconies can be problematic in tall buildings deterring residents from long term occupation. The emphasis on design and prime location as part of the planning requirements in turn produces a high-value investment product that may not actually be used as a long term home. These social implications are cross-referenced in the housing policies in the local plan.
- 2.7 A principal failing with tall buildings can be a lack of understanding of the nature of the area around them. Issues of local wind flow disruption, temperature reductions at pedestrian level around tall buildings, and street pollution flushing effects will have implications for the amenity of those living or working in or around the buildings.
- 2.8 Perhaps most importantly, a tall building if not in the right place and if not well designed including treatment of the surrounding public realm, will by virtue of its size and widespread visibility, seriously harm the qualities that people value about a place, disrupting rather than enhancing place character.
- 2.9 These negative issues around tall buildings raise questions as to whether constructing a tall building is in fact the best way of using well serviced land in Newham, or whether other forms such as mid rise blocks offer a better solution.

3 National Policy

- 3.1 The National Planning Policy Framework (NPPF) makes it clear that new development should be plan-led, with an emphasis upon the Local Plan having clear policies on what will or will not be permitted, in order to provide clarity for the determination of development proposals (paragraph 154).
- 3.2 The NPPF does not mention tall buildings specifically so that consideration falls under Section 7: Requiring Good Design.
- 3.3 An up-to-date local plan based on a sound evidence base will contain enough detail to allow local planning authorities to identify where tall buildings would not be appropriate because of their adverse impact.
- 3.4 Guidance on Tall Buildings (2007) published by English Heritage and the Commission for Architecture and the Built Environment (CABE) that informed the Core Strategy policy has been superseded by Historic England's Advice Note 4 'Tall Buildings'. This note is the only national guidance available for tall buildings and its approach has been used in

the preparation of this study. No specific advice on tall buildings is contained in Building for Life (2012) but its guidance on better urban design is of relevance.

- 3.5 Advice Note 4 'Tall Buildings' states that 'In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications.'
- 3.6 The great benefit of an effective policy will be in reducing unnecessary, speculative applications in the wrong places, thereby avoiding wasting resources and hindering the delivery of appropriate developments.

4 London Plan Policy

- 4.1 The current London Plans approach links tall buildings to the compact city approach, seeing tall buildings as a way of increasing density at highly accessible points. London Plan Policy 7.7 'Location and Design of Large and Tall Buildings' states that Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks. These areas should be consistent with the place-making, design, regeneration and environmental criteria.

5 Newham Policy

- 5.1 Policy SP4 'Tall Buildings' in its current form notes that tall buildings can signify regeneration and economic success but a strategic approach to their location is necessary.
- 5.2 Stratford Metropolitan and as a secondary focus Canning Town are the key location for the tallest buildings in the borough (20 storeys plus); strategic sites within the Arc of Opportunity may be suitable locations for buildings of up to 19 storeys if the buildings will contribute to legibility, place-making, and sustainable communities objectives with sufficient space between clusters; elsewhere tall buildings will be generally inappropriate with possible exceptions for good public transport access and the Arc of Opportunity criteria as well as sensitivity to local and historic context; and in all cases a tall building will be expected to meet criteria also set by the London Plan of exemplary design and management standards.
- 5.3 The policy includes a matrix of permissible building heights set against area and site designations in the Local Plan. The matrix which is indicative rather than obligatory sets a range of acceptable heights for locations from Stratford Metropolitan to non-designated sites in Urban Newham.

6 More Central Neighbouring Authorities' Policies

- 6.1 Tower Hamlets Local Plan states that building heights will be considered in accordance with the town centre hierarchy; and, tall buildings will be accommodated in two areas adjacent to LB Newham: Leamouth Peninsula ('City Island') and Bromley-by-Bow North East Quadrant. No specific guidance is given about heights. The Issues and Options for their new Local Plan proposes the concept of a tall buildings zone without further details.
- 6.2 London Legacy Development Corporation Local Plan states that tall buildings should be located within centre boundaries.
- 6.3 These, and emerging patterns of development are relevant to design integration considerations.

7 Tall buildings across London

- 7.1 The 'London Tall Buildings Survey – Annual Update March 2016' commissioned by New London Architecture observed that there are two essential criteria for the successful development of tall buildings in London: design quality and location.
- 7.2 The survey noted that one of the most striking findings is that whilst the overall numbers of proposals for tall buildings has increased, the level of construction activity remains relatively consistent. This is likely to be due to the significant development and investment risk required to commit to construct tall buildings.
- 7.3 It was also noted that there is evidence of efficiency in the planning system with 43 applications for tall buildings across London gaining planning permission. The survey suggests that this points to the benefit of a clear strategic approach for the location of tall buildings that have been established by the London Plan and borough planning policies.
- 7.4 The survey also found that 73% of tall buildings in pipeline for London will be for residential use.

8 Tall Buildings in Newham: Analysis of post 2012 consents

- 8.1 A study of planning permissions for tall buildings in the borough granted since the Core Strategy was adopted in 2012 found that a total of 23 schemes have been approved.
- 8.2 14 (61%) were for tall buildings at locations where policy SP4 indicates that such developments are appropriate and were fully policy compliant.

- 8.3 Nine sites (39%) were in locations where the matrix indicated a lower height. Of these nine sites, seven are located within the Arc of Opportunity and two are within Urban Newham. However, a close examination of the circumstances of each of the sites found that the approvals were justified by criteria also contained in the current policy: tall buildings already present in the locality setting a local character which accommodated the height of the proposal; proximity to public transport nodes; and design excellence as certified by the Design Review Panel.
- 8.4 For example in the redevelopment of West Ham Football ground, a site in Urban Newham, the indicative heights set out by the policy were considered but the proposal was related to the scale of the existing stadium. It was also considered that as the scheme was sensitively treated at the boundaries adjoining housing there was not a conflict with policy.
- 8.5 In the case of the WE5B a non-strategic site in Canning Town (Arc of Opportunity), it was concluded that a 20 storey building in this location should be supported in context of the policy because public transport accessibility was expected to rise with introduction of Crossrail services; there were other neighbouring tall buildings nearby; the high quality design of the proposal; and, a tall building has been consented on the site previously.
- 8.6 The approval of an 18 storey building at Minoco Wharf, a strategic site within the Arc of Opportunity was approved at a greater height than the policy indicated because the site fell between two DLR stations and the buildings are aligned to create new routes to and from them into the site. It was concluded that the proposed building heights responded to the massing of a new urban quarter and are in line with surroundings.
- 8.7 No instances were found of an unjustified approval which directly contravened the policy but rather the policy has been formulated with an inherent flexibility to allow for design innovation pertaining to quality. This facility should be retained in the review.

9 Conclusions

- 9.1 Despite some perceptions to the contrary, the tall building policy does appear in fact to be operating satisfactorily in Newham. Similarly, New London Architecture Tall Buildings Survey 2016 concluded that the clear strategic approach for the location of tall buildings that has been established by the London Plan and other planning policies are having an effect.
- 9.2 Nevertheless, the matters pertaining to the successful design and location of tall buildings discussed above can be incorporated or further emphasised in an update to the existing policy which will improve its reach and robustness:
- Importance of a plan-led approach to tall buildings, with more site specific detail on larger sites regarding appropriate and sensitive locations and scale,

including integration considerations – this needs to include considerations of cross boundary spatial integration.

- A tall building may not be the best use of a site
- Importance of integration of the tall building with the public realm, and general neighbourliness – ‘giving something back’.
- Design quality is of utmost importance and includes the development of high quality living accommodation for a tall building’s residents; reference should be made to the new Historic England Advice note.

Appendix 1 – Tall Buildings Approved Since 2012

| Address / Scheme Name | Date of decision | Proposed Height | Location (SP4 Category) | Appropriate height according to SP4 matrix | Exceptional design quality/other reasons argued? | Issues raised for SP4? |
|------------------------------------|------------------|-------------------|---------------------------------------|--|---|---|
| Tidal Basin Road (Hoola building) | 25-Apr-14 | 23 and 24 storeys | Strategic Site S30 Arc of Opportunity | Up to 12 storeys | Committee report noted that two tall buildings (25 and 17 storeys) were already approved at the site under reference 09/02013/FUL Committee decision 19 July 2011. Also 24 storey building approved at adjacent WE8 site prior adoption of core strategy. Officer concluded that principle of tall buildings already accepted at this site. | No - particular site circumstances justify approval |
| West Ham United Football Club | 10-Mar-16 | 3 to 11 storeys | Urban Newham No allocation | Up to 5 storeys | Committee report considered SP4 but related proposal to scale of existing stadium. Also considered that as the scheme was sensitively treated at the boundaries adjoining housing there was not a conflict with the policy. | No - particular site circumstances justify approval |
| WE5b Western Gateway, Canning Town | <i>Pending</i> | 20 Storeys | Arc of Opportunity Non-strategic site | 5-8 storeys in exceptional circs | Committee report concluded that 20 storey building in this location should be supported in context of SP4 because PTAL expected to rise with introduction of Crossrail services; other neighbouring tall buildings nearby; high quality of design; a tall building has been consented on the site previously. | No - particular site circumstances justify approval |
| 64 66 West Ham Lane | 10-Oct-13 | 8 storey | Urban Newham Non-strategic site | Up to 5 storeys | Proposed height not out of context in area. | No - particular site circumstances justify approval |
| Goswell Bakeries, Canning Town | 15-Oct-13 | 16 storeys | Strategic Site 16 Arc of Opportunity | Up to 12 storeys | High quality design appropriate to site and context delivered with support of Design Review Panel. | No - particular site circumstances and high quality design justify approval |

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|--------------------------|----------------|-----------------------------|--|------------------|---|---|
| Camel Works | <i>Pending</i> | 7 Storeys | Arc of Opportunity Non-strategic site | Up to 5 storeys | Prominent location adjacent London City Airport. Scale of development not unreasonable in context of surroundings. Policy referred to in report/decision: Yes. At para 2.3.15 officer concludes that same scale as nearby tower blocks and will be a marker at entrance to London City Airport. Emerging character of area is of a similar scale. | Yes - Trend is for airport vicinity development to be acceptable at greater height than matrix indicates. |
| Minoco Wharf | 30-Mar-13 | 13 and 18 storeys | Strategic Site 22 Arc of Opportunity | Up to 12 storeys | Noted that site between two DLR stations and the buildings are aligned to create new routes to and from them into the site. Report concludes that building heights respond to massing of a new urban quarter and are in line with surroundings. | Yes - Trend is for riverside/wharf development to be acceptable at greater height than matrix indicates. |
| Silvertown Quays | 16-Jul-14 | Max 49.9m approx 16 storeys | Strategic Site 31 Arc of Opportunity | Up to 12 storeys | Report noted Pontoon Dock is reasonably adjacent, and new bridge to Custom House DLR station is proposed. Development has been masterplanned. | Yes - Trend is for riverside/wharf development to be acceptable at greater height than matrix indicates. |
| Pontoon Dock | <i>Pending</i> | 15 Storeys | Non-Strategic Site Arc of Opportunity | Up to 12 storeys | Committee report considered SP4 but considered that proposal was same scale as adjoining buildings in Barrier Park East, bookended development around the park, and provided emphasis to DLR station. | Yes - Trend is for riverside/wharf development to be acceptable at greater height than matrix indicates. |
| Ivax Quays | 20-Dec-13 | 13 storey | Strategic Site 19 Arc of Opportunity | Up to 12 storeys | | No |
| Plaistow Hospital | 28-Mar-13 | 6 Storey | Urban Newham | Up to 5 storeys | | No |
| Atlantis Avenue | 20-Dec-13 | 12, 5 and 8 storeys | Strategic Site 19 Arc of Opportunity | Up to 12 storeys | | No |
| Hotels at Connaught Road | 05-Nov-13 | 7 to 10 storeys | Strategic Site 19 Arc of Opportunity | Up to 12 storeys | | No |

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|---|----------------|-----------------|---|------------------|--|-----|
| 110 Barking Road, Canning Town | 24-Dec-13 | 7 storey | Arc of Opportunity, Key Corridor | Up to 7 storey | | No |
| ABP, Royal Albert North | 21-Dec-15 | 6-8 storeys | Strategic Site 31 Arc of Opportunity | Up to 12 storeys | | No |
| Gallions Quarter, Albert Basin | <i>Pending</i> | 3 to 12 storeys | Strategic Site 19 Arc of Opportunity | Up to 12 storeys | | No |
| East Ham Police Station | 16-Sep-14 | 6 Storey | Urban Newham Strategic Site 26 | Up to 8 storeys | | No |
| Morgan House | 29-Sep-14 | 42 storeys | Strategic Site S05 Stratford Metropolitan | 20 plus storeys | | No |
| 1 Knights Road Silvertown | <i>Pending</i> | 12 storeys | Strategic Site 22 Arc of Opportunity | Up to 12 storeys | | No |
| 117 - 125 Freemasons Road Canning Town London E16 3PH | 01-Jul-16 | 6 storeys | Urban Newham Not a strategic site | 5 storeys | SP4 carefully considered in committee report. Not a location for tall buildings according to matrix but legible design and character of area which already contains buildings of a similar height were considered to justify approval. | No. |
| Springboard House 2A Cloughton Road London E13 3PN | 24-Oct-16 | 6 storeys | Urban Newham Not a strategic site | 5 storeys | Again SP4 carefully considered in committee report. Not a location for tall buildings according to matrix but legible design and character of area which already contains buildings of a similar height were considered to justify approval. | No |
| Land Former 213 To 217 Barking Road E16 4HH | 22-Jan-14 | 6 storeys | Urban Newham Not a strategic site | 5 storeys | Design Review Panel satisfied with architectural quality and proposals for landscaping. Character of area includes nearby 8 storey buildings. | No |
| 210 Plaistow Road London E13 OAL | 13-Mar-13 | 10 storeys | Urban Newham Not a strategic site | 5 storeys | SP4 Policy listed in report but proposal not assessed under policy. Site a very sustainable one adjacent station and design evolved with guidance of DRP. Tall buildings already present in the area. | No |