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Sent by Email

9th December 2016

Dear Sirs,

Mayor of London – ‘A City for all Londoners’ Consultation (October 2016)

Thank you for your invitation to comment on the Mayor's vision for London 'A City for all Londoners' consultation. Our comments are set out on a chapter by chapter basis below.

Canary Wharf Group (CWG) has substantial land and development interest in the form of the Canary Wharf estate as well as several other sites in the London Borough of Tower Hamlets, London Borough of Lambeth and the City of London. CWG plays a strategic role in London in terms of employment, residential, retail and leisure and transport for local residents, employees and visitors.

The Canary Wharf estate forms part of the Isle of Dogs Opportunity Area (as designated in the London Plan (2016)) and is recognised as part of the Central Activities Zone (CAZ) for office policy purposes. Canary Wharf is currently designated as a Major Town Centre with recognition in the London Plan to become a Metropolitan Centre.

Part 1: Accommodating Growth

CWG strongly supports the Mayor's "pro-development approach" and aim of accommodating as much population and economic growth as possible within London as well as intensifying housing development around stations and well-connected town centres so that more people can live in convenient locations. CWG also support the Mayor's emphasis on more mixed-use development and the inclusion of well-designed higher density development as a method to meet growth demands.

With regard to the Mayor's aim of protecting land used for employment across the city, CWG recognise the importance of supporting the economy, however as set out in paragraph 22 of the National Planning Policy Framework (NPPF) (2012) and Chapter 4 of the London Plan (2016) where there is surplus employment land and/or other benefits (such as housing delivery) can be realised from the redevelopment of employment sites for other uses, planning policies should be in place to manage this process. This is recognised on page 23 of the consultation document, under the heading 'Housing and mixed-use land' where reference is made to using land "intelligently" and where it is acknowledged that housing and industrial activity can co-exist in certain locations.

Related to this, a number of references are made within the consultation document to the business competition that London faces from places such as Hong Kong and Singapore. It is important to understand what employees are seeking when looking for jobs in a global market and this increasingly includes jobs which are in direct proximity to homes, services and leisure activities and not just office environments. In direct response to this and to maintain their competitiveness, places like Canary Wharf are becoming much more mixed-use areas. It is important that this approach is supported and allowed to continue.

CWG agree with the approach to see more development in town centres, given the accessibility of these locations as well as intensifying development around well-connected transport nodes. Areas such as the Isle of Dogs and Canary Wharf Major Town Centre which is served by DLR, underground and in 2018 Crossrail are exactly the sorts of places where significant and much higher-density housing development should be directed. As also identified in the consultation document (page 25), opportunity areas are areas where development should be accelerated.

Part 2: Housing

CWG support the positive approach towards addressing housing challenges including more house building on public sector land and helping the development industry to do more. It is important however that the objectives to increase housing delivery are not rendered unviable by the ambitious affordable housing targets and that scheme viability remains part of the consideration of planning applications.

Part 4: Environmental, transport and public space

CWG wholly agree with the statement that tall buildings will continue to play a role in the future of London; tall buildings are essential for accommodating growth within London. We also agree that tall buildings must make a positive contribution to the streetscape and the skyline.

Conclusion

Overall CWG welcome the positive tone of the 'A City for all Londoners' consultation document, the 'pro-development approach' and the strategy of accommodating growth around stations and well-connected town centres.

It is important however that the changing requirements for ensuring successful business environments (such as mixed-used places) are recognised and that planning policy retains sufficient flexibility for mixed-use scheme to come forward on employment land where justified. Scheme viability also still needs to be considered whilst pursuing ambitious affordable housing targets.

With kind regards,

Yours faithfully,



JASON LARKIN

Associate Director – Planning