

**Written Statement on behalf of Canary Wharf Group Plc (“CWG”)**

**CENTRAL ACTIVITIES ZONE, OFFICES, INDUSTRY AND FREIGHT**

**Matter 58: Central Activities Zone including Isle of Dogs (North) (“CAZ”)**

**M58 Would policies SD4 and SD5 be effective in ensuring an appropriate mix of housing, offices and other development in different parts of, and outside, the CAZ to support:**

- a) The “strategic functions” of the CAZ (paragraph 2.4.4);**
- b) “locally orientated uses” in the CAZ (paragraph 2.4.5) and Policy GG1 “building strong and inclusive communities”;**
- c) Policy GG4 “delivering the homes Londoners need”; and**
- d) Policy GG5 “growing a good economy”?**

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1. Further to our representations made on the consultation draft of the New Draft London Plan 2017 (letter dated 2<sup>nd</sup> March 2018) we have set out our representations on Matter 58 below.

- a) The “strategic functions” of the CAZ (paragraph 2.4.4);**
2. The Isle of Dogs (North) (IoDN) forms part of the Central Activities Zone (CAZ), and is of strategic importance to the delivery of employment and economic growth in London. The long-term success of the IoDN is reliant on the evolution of this area from a business district into a mature Metropolitan Town Centre that can attract various types of occupiers to support a diverse range of employment across various sectors and skills.
3. It is therefore vital that supporting policy for this area consider the need for other strategic CAZ functions as defined by the London Plan (para 2.4.4) and residential uses (including accommodation for those in higher education) in the context of their importance to the success of the office market in this location.
4. IoDN office market is experiencing change. Historically IoDN has attracted large international headquarters, with a predominance in the financial services sector. However, the growth in different sectors, such as the tech sector, and changes in what office occupiers are looking for, has significantly altered the type of space that is now needed. There is less demand for large floorplate single occupier buildings, that are generally developed on a pre-let basis. However,

there is increasing demand for smaller scale multi-let buildings that are more flexible. In addition, office occupiers are looking for a wider range of factors in where they locate. A greater emphasis on lifestyle factors such as access to leisure, retail, recreation and housing has led to office occupiers wanting to locate in places that offer this type of diversity and vibrancy. Developments such as our Wood Wharf scheme within the IoDN can deliver this type of diversity.

5. It is therefore vital that Draft Policies SD4 and SD5 do not limit future development to meet these needs in order to be effective in supporting the strategic function of the CAZ as London's economic centre. Draft Policy SD4 part B should be amended to include text that recognises that office locations within the CAZ need to adapt to changing needs (suggested amendment in red below).

*Draft Policy SD4 Part B. "The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demands for a range of types and sizes of occupier and rental values. In addition, office locations should be supported to adapt to changes in demands from office occupiers and provide associated supporting infrastructure and uses."*

6. Draft Policy SD4 part N calls for Development Plans to define detailed boundary for the IoDN CAZ and to develop locally sensitive policies to meet the Plans objectives for the CAZ. Draft Policy SD5 'Office, other strategic functions and residential development in the CAZ' provides additional policy direction on how the balance of uses should be controlled within the CAZ.
7. Some flexibility and recognition should be given to the value of residential development in some areas in order to create a vibrant and diverse environment. Draft Policy SD5 part B states that residential development is not appropriate in defined parts of the IoDN. Part C states that greater weight should be given to office and other CAZ strategic functions over residential uses.
8. We seek to add additional wording to supporting text to reflect the need for flexibility where it can be evidenced that residential development (including accommodation for those in higher education) could support the office market and wider strategic CAZ uses. For instance, there may be circumstances where the 'greater weight' requirement for CAZ Opportunity Areas has a negative impact on the delivery of housing in certain parts of these areas. As such, there should be a mechanism through the Development Plan process (either through defining the CAZ boundaries or specific Site Allocations) to exclude parts of the IoDN from the controls put forward by Parts B and C.
9. Alternatively, additional wording could be added to that supporting text in paragraph 2.5.3. (additional text in red):

*The agglomerations of offices and other CAZ strategic functions should not be compromised by new residential development. Given their strategic importance, as a general principle, offices and other CAZ strategic functions are given greater weight relative to new residential development in the Zone (with exceptions set out in policy). Residential development is considered inappropriate in defined parts the of the City of London and Northern Isle of Dogs reflecting the prominent role of these locations in providing capacity for world city business functions. This policy will ensure that the current and future potential to assemble and deliver office development in these locations is not compromised by residential development **unless it can be robustly demonstrated that there is a sufficient supply of commercial floorspace to meet employment need and that residential uses would enhance the strategic function of the CAZ.***

10. In addition, this would avoid conflicting with other Draft Policies, such as Draft Policy SD6 ‘Town Centre and High Street’ part D which supports the delivery of housing (including accommodation for those in higher education) in town centres. The IoDN is also defined as a metropolitan town centre within the Draft New London Plan where these types of uses are vital to the health and vitality of the town centre.