

# Tall Buildings and the Emerging Local Plan for Tower Hamlets

## Introduction

Tower Hamlets has the highest housing density of any London borough— it's the most densely populated area in England, with over 15,695 residents per square kilometre. ([State of the Borough 2023](#))

The borough's proximity to the City and Canary Wharf has driven demand for high-density living. The pressing need for more social housing and limited development sites have led our Mayor to follow a much more permissive approach to locations where tall buildings will be allowed

## Existing policy and proposed changes

The Council topic paper '[Tall Building Methodology](#)' (August 2024) explains the removal of reference to the height of surrounding buildings in the previous definition of a tall building. This is because the London Plan (adopted after the current Local Plan), requires boroughs to set specific heights in definitions of tall buildings. **'To address this, the new Local Plan defines a tall building as simply any building which is above 30m in height, as measured from ground level to the uppermost part of the structure.'**

The existing **2020 Local Plan** included 5 zones (A-E) regarded as suitable for tall buildings:

Zone A (**Aldgate**). This zone has a primarily office/commercial character.

Zone B (**Canary Wharf**). This zone has a primarily office/commercial character in the centre, with increasingly residential character at the western, eastern, and northern edges.

Zone C (**Marsh Wall and Millwall Inner Dock**). This zone has a primarily residential character.

Zone D (**Blackwall**). This zone is of mixed residential/commercial character.

Zone E (**Leamouth**). This zone has a primarily residential character.

The new **Local Plan** proposes creating an additional, much larger zone F. **'This zone consists of all areas suitable for tall buildings that do not fall within zones A to E. This zone has a mixed character, with variations across different neighbourhoods.'**

**A height limit of 70m was set for Zone F.** This was based on the defined height of a tall building in the neighbouring City of London, a location with a significant cluster of tall buildings, (Paragraph 20, Tall Buildings methodology)

The map below shows the existing A-E zones in pink and the proposed zone F in mauve.

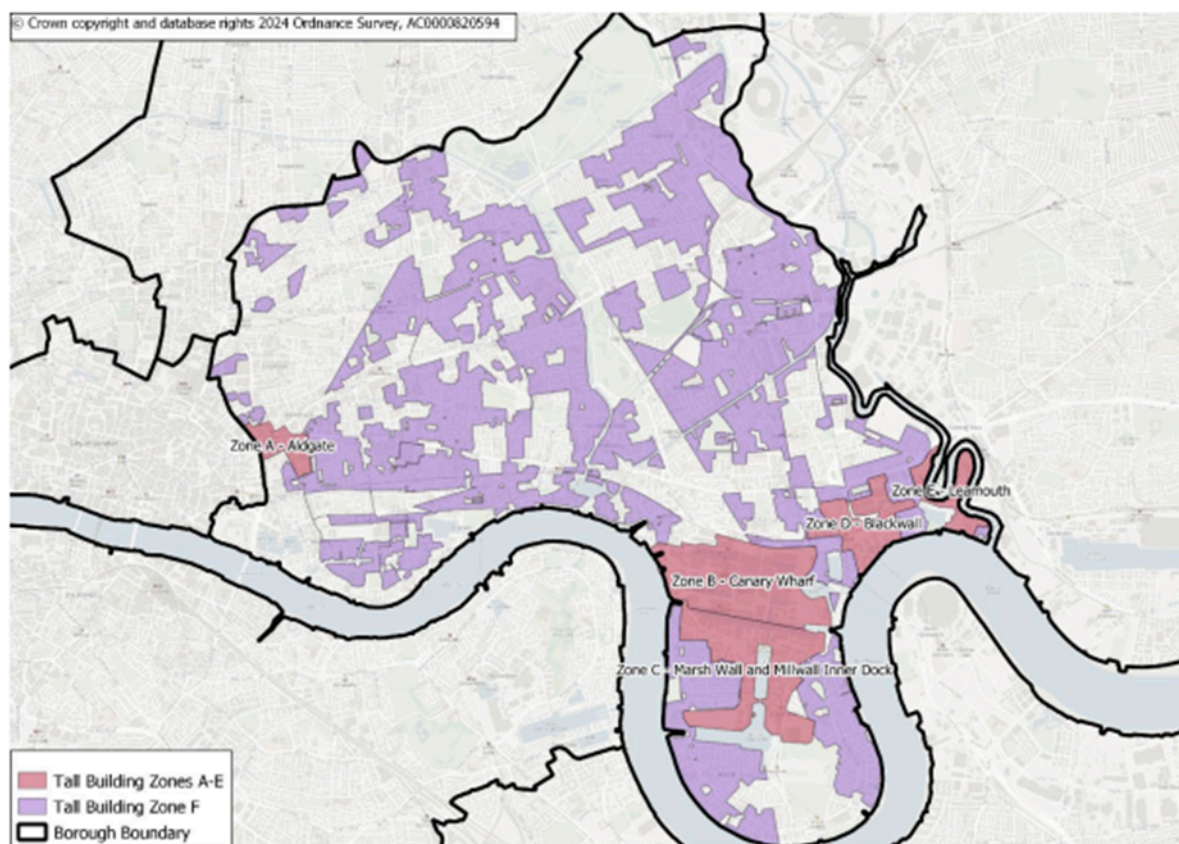


Figure 5: New Local Plan Tall Building Zones, Regulation 19 consultation version

Following consultation on the new [Local Plan](#), a full Council meeting in November will consider the plan before submitting it to the Secretary of State (SoS) in early 2026. The SoS will then appoint an independent planning inspector who will examine the Plan and make recommendations for any modifications that are required before it can be found sound and adopted.

## Tower Hamlets housing context

It's clear that [Tower Hamlets](#) faces severe housing pressure, with over 28,000 households on the waiting list, 13,209 households living in overcrowded conditions and 3,220 households in temporary accommodation. The borough is the fastest-growing local authority in the UK, with population expected to rise from 323,854 (2022) to 389,845 by 2032.

The **Mayor's Accelerated Housing Programme** (MAHP) approved in July 2025, will fast-track up to 3,332 new homes across 37 council-owned sites over the next five years. The focus will be on larger family homes to address overcrowding, accessible housing for residents with medical needs and better sustainability and energy efficiency standards. At Cabinet in July the Council agreed a budget of £8 million to

fund the progression of the MAHP development to the next stage, which includes securing planning consent for most of the sites and formal pre-application submissions for the remainder.

## **Are planning mistakes from the past about to be repeated?**

The new Local Plan will require criteria to be met for permission to be granted for tall buildings in the new zone F. Proposed **Policy PS2 Tall buildings** says: **'All proposals that include tall buildings must demonstrate how they provide significant public benefits; and residential proposals that include tall buildings must meet the affordable housing requirements set out in Policy HF2, including provision of 40% affordable housing, with 85% of that affordable housing delivered as social rented homes.'**

This policy states proposed heights must meet 15 criteria, including: **'take account of, and avoid causing harm to the significance of, national or borough-designated landmarks, heritage assets, Conservation Areas, key views and other historic skylines, and their settings;'**

In the 1960s and 70s, UK planning mistakes with tall buildings included poor design, lack of community integration, and over-reliance on high-rise solutions for housing and urban renewal. These contributed to social isolation, anti-social behaviour and long-term maintenance issues. Planning authorities often lacked accountability and public engagement, leading to decisions that didn't reflect residents' needs.

High-rise housing was seen as a quick fix for post-war housing shortages and slum clearance. It's crucial lessons are learnt, and we don't allow the good intention of tackling urgent housing needs to create long-term future problems. Lessons were learnt in Bow when two out of three tower blocks on the Monteith Road Estate in E3 were demolished in 2002 and replaced with new low-rise housing as part of a regeneration masterplan.

**A major risk is that the provision of social housing itself is seen as sufficient public benefit to justify planning consent, irrespective of the criteria for tall buildings in the Local Plan, and how the proposals fit within the wider Development Plan, which includes the London Plan and Neighbourhood Plans.**

This danger is illustrated by the recent decision to demolish the remaining unsafe, 63 metre 22 storey Clare House tower in Bow floor by floor over two years. It will be replaced, not with low-rise housing similar in scale to the neighbouring streets, but by a taller, 23 storey block and 4-5 storey 'pavilion' homes. This will deliver 145 much needed homes for social rent, a replacement community centre and landscaping improvements, but completely ignores other planning policy considerations. The main argument used to justify the decision seems to be that as a tall building already exists on the site, building another will do no harm because it's providing much

needed social housing. **The redevelopment of the site with low-rise buildings of a similar scale to existing homes was not considered as an option according to the access and design statement.**

## Lessons from the Isle of Dogs

Multiple developers operating independently makes coordinating infrastructure challenging. The neighbourhood plan for the Isle of Dogs highlighted how housing was delivered before needed infrastructure was in place. This led to overcrowded schools, GP shortages and transport bottlenecks.

Stronger phasing policies are needed that tie development approvals to infrastructure milestones, transparent infrastructure delivery schedules with accountability mechanisms and greater integration with GLA and TfL strategies for transport and emergencies services

The [integrated assessment](#) report produced for the Council by the global consultant, WSP, seeks **‘to promote sustainable development by assessing environmental, social and economic impacts, as well as mitigating any potential adverse effects that the plan might otherwise have.’** It provides assessment of different types of impact of the Local Plan, and says it enables synergies and cross-cutting impacts to be identified, reducing duplication of assessment work.

**A significant risk however is that this high-level approach to assessing impact of developments will be used to justify large residential assessments without sufficient scrutiny of the impact on particular neighbourhoods and communities, ignoring detailed evidence contained in documents such as the [Tall Building Methodology](#) topic paper (August 2024) and 2022 [Tall Buildings Supplementary Planning Document](#) (SPD).**

Integrated assessment is a valuable planning tool giving a birds-eye view through assessing a range of factors for proposed sites, but it doesn't provide detail for assessing the impact of specific developments on their neighbourhoods. For example, regarding housing, the assessment focuses on meeting housing targets and doesn't address social impact. The Milharbour site is the only one of 32 sites where any potential negative impact is identified. What will be the standard of evidence required by the Council to show the 15 criteria in **Policy PS2 Tall buildings** will be met in providing public benefit?

Concerning 'historic environment' the assessment does mention the effects of the London Plans housing target of 34,730 new homes by 2028/29: **‘This could lead to significant levels of development which have potential for negative effects on the historic environment. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of**

the historic environment. Both positive and negative effects have therefore been identified.'

The voices of local communities may also become fainter as technical assessments hold sway and inclusive development retreats. For example, the **Roman Road Bow Neighbourhood Forum** has struggled to enable the Bow community to have meaningful involvement in the planning process for specific approved developments, such as in the design of the replacement community centre for the tall building to replace Caxton Hall.

### **Height and Numbers of homes obscure other Considerations**

The image below from planning documents shows the replacement tower for Clare House, the top of which is hidden from view. The design and access statement for the site acknowledges: **'The Sub Area: Central, is the only one that is not an Opportunity Area. However, in order to meet future needs, the Central Area needs to accommodate 7,597 new homes, or 14% of the borough's total, during the plan period.(p.11)** Regarding Victoria park Conservation Area, the statement admits: **'Overlaying the red line boundary with the Victoria Park Conservation area reveals that the Northern portion of the proposed footprint overlaps with the Conservation area boundary.'**(p.18)



*Figure 8: Computer Generated Image of proposed tower when viewed from Sycamore Avenue.*

Wider considerations such as the 2022 [Tall Building Supplementary Planning Document](#) are brushed aside. This policy argues for **a plan-led approach** to managing tall buildings and sets out twelve objectives. Regarding the central area of the borough, it identifies three main sites where tall buildings are seen as appropriate: the former gas works site in Bow Common Lane, Crisp Street market and Queen Mary University campus:

**‘5.3.18. Beyond these sites there are no strong justifications for tall buildings with large parts of the Central sub-area composed of development that is modest in scale, and there are significant heritage assets. Many parts of the Central sub-area also have low public transport accessibility.’**

**‘5.3.5. The Central sub-area is rich in history and heritage, and the area includes many heritage assets that are particularly sensitive to tall buildings. These include: 29 conservation areas (21 entirely within the area and eight extending into adjacent parts of the borough); numerous listed buildings; and three registered parks and gardens.’**



*Figure 13: Computer Generated Image of proposed tower when viewed from the south looking west.*

Concerns were raised by Historic England and the GLA in the previous consultation about tall buildings being built in the new zone F close to heritage assets, such as listed buildings and low-rise conservation areas. Officers from Tower Hamlets met with officers from Historic England and the GLA after the consultation to discuss these issues further. Based on these discussions and the consultation responses, it was concluded that further changes to Tall Building Zone F were needed to make the policy acceptable in heritage terms.

Overall, the changes made were relatively small. The Tall Buildings Methodology report mentions the Council commissioned a detailed report (May 2023) to its **'Characterisation and Growth Strategy'**. This appendix provided clear evidence in assessing the 4 main areas of the Local Plan for growth (City Fringe, Central Area, Lower Lea Valley and Isle of Dogs and South Poplar). It considered a wide range of factors, including built environment and density, mean height of buildings ('context height'), residential density, character and types of building, coherence of character, design, social and cultural significance, sensitivity to change and opportunities for change and growth.

Despite these detailed assessments the tall buildings report concluded: **'The document identified a number of areas across the borough as 'highly sensitive to change' on the basis that they were highly coherent in character and of high design quality; consisted of historic areas that are particularly sensitive to change; or are areas protected from development by another designation (such as open space or Gypsy and Traveller sites). A number of these areas overlapped with Tall Building Zone F, and officers considered it sensible to review these areas to confirm whether**

their high level of sensitivity made them unsuitable for inclusion in Zone F. However, upon review, it was determined that no changes needed to be made to these areas.

One questions the purpose of commissioning such detailed reports, then rejecting their findings without providing an evidence-based rationale.

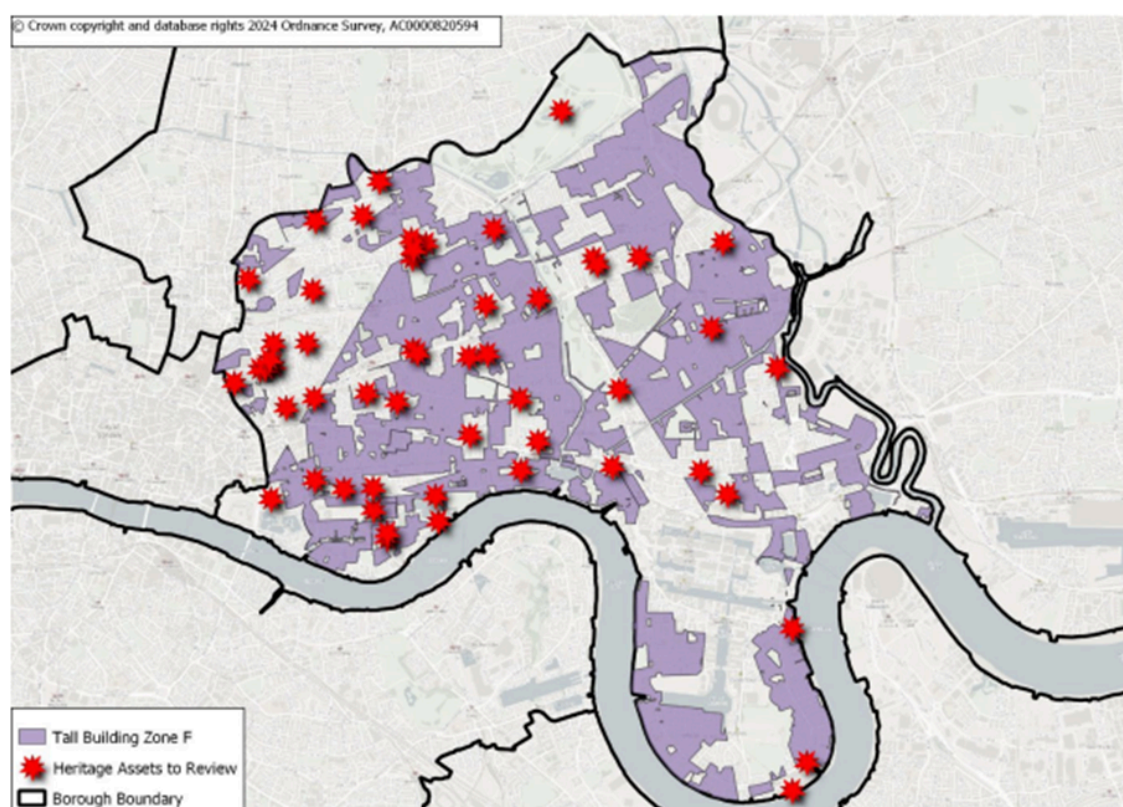


Figure 4: Heritage assets to review, overlaid on Tall Building Zone F, Regulation 19 baseline version

The figure above shows Heritage assets reviewed in relation to Tall Building zone F (page 15 of 'Tall Building methodology.'

The tall building report shows no recognition of the social, cultural and heritage value of some older housing estates: **'Many of the remaining areas highlighted as 'highly sensitive' were LCC estates from the first half of the 20th century, and while these are acknowledged to have a unified character, it was felt that as they were unlisted and not within conservation areas, there would be limited justification to remove them from Tall Building Zone F.'**

## Conclusion

The Council's commitment to address the borough's acute shortage of affordable housing is admirable. Current experience highlighted in this article indicates this is

leading to a narrowing of policy considerations to achieve the maximum number of homes as quickly as possible. The new zone F for tall buildings covers many parts of the borough, ignoring much of the detailed analysis of the Council commissioned appendix report to the [‘Characterisation and Growth Strategy’](#). It also conflicts with key existing policy such as the 2022 [Tall Buildings Supplementary Planning Document](#) (SPD).

The Council’s frequently asked questions ([FAQ](#)) states: **‘The Tall Buildings SPD is a spatially focused SPD. It responds to the requirement within the London Plan to identify locations where tall buildings are appropriate in principle and to indicate the building heights that could be appropriate. This consideration is informed by a detailed understanding of Tower Hamlets Places, their character, morphology and townscapes, of heritage sensitivities and also the Local Plan vision for growth and the current development pipeline across the borough.’**

The proposed zone F is not informed by such a detailed understanding, but by a rush to build as many homes as quickly as possible. A plan-led approach that follows a high-level integrated impact approach may help justify individual site developments at the expense of curtailing detailed analysis of considerations other than providing much needed homes. This approach may stifle inclusive development and the expression of local community voices, and conflict with existing policy, risking serious long-term harm. For these reasons the proposed new and extensive zone F within the emerging Local Plan is opposed.

**Mike Mitchell, November 2025**