

St Clements Hospital

Bow Road
London E3

DRAFT Planning Brief

June 2004
Rev 23/06/04



St Clements Hospital Preferred Use for the Site:

***Residential including 3,000 sqm primary health and social care facility
(1,000 sqm joint health and social care & 2,000 sqm specialist Physical
& Sensory Disability Centre)***

Key Redevelopment Issues:

1. *Site suitable for high quality innovative redevelopment*
2. *Respect and respond to the neighbouring buildings*
3. *Good design will dictate the built form*
4. *Respect setting of listed buildings and conservation area*
5. *35% affordable housing*
6. *80:20 mix affordable:intermediate housing*
7. *Limited parking*
8. *450-700 units (flats) per hectare*
9. *Open space to be provided on site*
10. *Public routes through site to be provided*
11. *Planning application shall be supported by a Design Statement, Transport Assessment, Access Statement and Travel Plan*
12. *A section 106 agreement will be entered into; and*
13. *The applicant will be expected to undertake consultation with the local community.*

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1. Introduction

Reasons for and Status of the Brief

- 1.1 The clinical services currently located at St Clements Hospital (formerly the City of London Infirmary) are to be transferred to a new, purpose built, Adult Mental Health Facility at Mile End Hospital (also within the London Borough of Tower Hamlets) in October 2005. The majority of the St Clements site will then become surplus to requirements and will be available for disposal. A plan of the site is included at Appendix 1.
- 1.2 The local NHS Stakeholders are jointly managing the disposal of St Clements. These comprise:
 - Tower Hamlets Primary Care Trust;
 - North East London Strategic Health Authority;
 - East London and The City Mental Health NHS Trust (ELCMH NHS Trust);
 - Social Services Department, London Borough of Tower Hamlets.
- 1.3 This draft Planning Brief has been prepared by Drivers Jonas on behalf of the NHS Stakeholders and Tower Hamlets Borough Council (the Council). It sets out the planning principles to be considered in the preparation of development proposals for the St Clements Hospital and aims to secure development which is appropriate for, and maximises the benefits of, the site's urban location, and which accords with the Council's planning and conservation objectives.
- 1.4 The draft Brief is considered an important element of the Council's planning strategy for the St Clements site. Whilst it takes into account the statutory planning framework established by the Council's adopted 1998 Unitary Development Plan (UDP), that Plan is currently under review and many of the policy requirements are out of step with strategic and national policy guidance. The draft Brief therefore also has regard to the London Plan, the emerging UDP, relevant Planning Policy Guidance notes (PPGs) and relevant Supplementary Planning Guidance (SPG) issued by the Council.
- 1.5 The "Planning Principles" contained within the draft Brief have been prepared in consultation with Council officers and have been approved by the Council's Cabinet for public consultation purposes. The intention is that the final draft Brief and a report on consultation responses will be submitted to Cabinet in October 2004, at which time Cabinet will be requested to adopt the final Brief as SPG, providing the policy framework upon which to base development control decisions.
- 1.6 As a result of the 1st Deposit Draft UDP, all SPG's will be revised to ensure they are consistent with the emerging policies, for adoption once the revised UDP is adopted.
- 1.7 The draft Brief will fulfil two main functions. First, it will guide the amount and type of development for the St Clements Hospital site. Secondly, it will form part of the package of material to be used to market the site prior to its disposal.

Current Future Health Care Provision

- 1.8 The London Borough of Tower Hamlets and the NHS are committed to providing further improvements to healthcare facilities within the Borough.
- 1.9 The current facilities at St Clements provide in-patient and out-patient adult mental health facilities, child and adolescent mental health services, a specialist addiction unit and corporate offices. However, the Hospital does not provide an appropriate environment for patient care. The April 2003 Commissioners for Healthcare Improvement (CHI) Report highlighted the need to move patients from St Clements to more appropriate accommodation as a matter of urgency.
- 1.10 The proposed purpose built hospital at Mile End will provide modern facilities to include single bedrooms, many with en-suite facilities, allowing segregation of genders and improved day facilities, providing natural light and well ventilated patient areas. The development will also include support accommodation such as therapy and an intensive care suite.
- 1.11 Additionally, the existing Children and Adolescent Mental Health Unit at St Clements is to be expanded and relocated to a new development at the Newham Centre for Mental Health. Whilst this Unit will be situated outside of the Borough of Tower Hamlets, it will serve residents of Tower Hamlets, as well as residents of Newham and Hackney providing a modern environment and a bespoke facility to serve the children of the three Boroughs.
- 1.12 The next ten years will see further significant investment in healthcare within Tower Hamlets with the following healthcare developments planned within the Borough:
 - Redevelopment of the Royal London Hospital, Whitechapel;
 - New Pathology and Pharmacy Development, Whitechapel;
 - Upgrade of existing building at Mile End for patients and support services;
 - Creation of Primary Care Trust (PCT) accommodation and Specialist Addiction Services at Mile End;
 - Local Improvement Finance Trust (LIFT) developments within the community;
 - Upgrade of 18 rehabilitation beds at 'The Green';
 - Retention of 1,000 sqm of health uses at the St Andrews Hospital site;
 - Re-use of the Queen Elizabeth Hospital site at Hackney for a mix of uses, including health and social care.

Ongoing Operational Requirements at St Clements

- 1.13 There is a requirement to relocate primary health and social care services provided by Tower Hamlets Primary Care Trust and the London Borough of Tower Hamlets Social Services Department to new or refurbished accommodation on the St Clements site.
- 1.14 The requirement is for a total floor area of 3,000 sqm gross, comprising a joint health and social care facility of 1,000 sqm gross for a primary care resource

centre and 2,000 sqm for a specialist Physical and Sensory Disability Centre for Independent Living, serving a population of 10,000 to 14,000 people. This facility is likely to have a requirement for 10 parking spaces.

- 1.15 There is also a requirement for key worker housing to be met on the St Clements site.

2. The Site and Surrounding Area

Site and Building Description

- 2.1 The St Clements Hospital currently occupies a site of approximately 4.57 acres (1.85 hectares). It comprises a collection of hospital buildings of varying age and quality providing a total of about 11,000 sqm (GIA).
- 2.2 The whole of the site is included within the boundaries of the Tower Hamlets Cemetery Conservation Area (the Conservation Area) and the northern boundary adjoins the Tredegar Square Conservation Area. The Council will therefore pay special attention to the desirability of preserving the character or appearance of the area. The boundary of the Conservation Area is shown on the plan at Appendix 2.
- 2.3 Additionally, the site contains two substantial Grade II Listed Buildings. The front wall, gate, gate piers along the Bow Road frontage are also listed. These structures are shown on the plan included at Appendix 2. The listing of the buildings is Pre-1986 and therefore does not include a detailed analysis of the merits of each building.
- 2.4 A detailed assessment of the site has been undertaken as part of a Conservation Appraisal carried out by specialists Feilden and Mawson. The Conservation Appraisal provides an assessment of the Hospital site in the context of the Conservation Area designation and an appraisal of each building in terms of its age, condition and use. It also deals with the curtilage of the Listed Buildings.
- 2.5 Feilden and Mawson have also assessed each building in terms of its historic and architectural merit and any contribution made to setting of the listed buildings and the character and appearance of the Conservation Area. The buildings have then been graded in terms of their merits and the scope for any alteration / demolition. Summary descriptions are provided at Appendix 3 and further comments on the analysis and the grading of buildings is provided in the Planning Principles in Part 4 of the draft Brief. The description and grading of buildings has been agreed in principle with English Heritage.

Surrounding Area

- 2.6 The St Clements Hospital site is bounded by Bow Road to the north, residential terraced properties to the west (Brokesley Street), the residential Britton Estate on British Street to the east, and the Tower Hamlets Cemetery Park to the south. A public footpath runs along the southern end of the site but there is no direct access from the Hospital.
- 2.7 Properties on British Street are ground plus 3 storeys, whilst properties on Brokesley Street comprise a terrace of flat roofed ground plus 1 storey residential properties.
- 2.8 The site benefits from excellent links to the City and West End via the nearby Mile End Underground Station, which is served by the Central Line and by the Hammersmith and City and District lines. The site is also within walking distance of Bow Road Underground Station, which is also served by the District and Hammersmith and City Lines and Bow Church Station, which is served by the Docklands Light Railway. A number of bus services stop on Bow Road.

- 2.9 Mile End is, in general, densely populated, mainly comprising residential uses. There are in addition a number of commercial (office, light industrial and retail) facilities on Bow Road.

Ownerships and Occupation

- 2.10 The East London and The City Mental Health NHS Trust has the freehold interest in the site.
- 2.11 The sub soil of the strip of the Hospital that fronts on to Mile End Road is owned by the London Passenger Transport Board.
- 2.12 There is an Agreement made with the Local Authority in 1976 concerning the creation of two openings in the eastern wall of the Hospital, access over the Council's adjoining land (in British Street – which is a private road) and the use of two fire hydrants. The benefit of the Agreement cannot be assigned without the Council's consent and either party can terminate it on 12 months notice and the rights can only be exercised in an emergency.
- 2.13 There is a Lease of an electricity sub-station to the LEB. Given the location of the chamber and the rights granted under the Lease.

Key Planning Considerations

- 2.14 An appraisal of the relevant adopted and emerging planning policy framework is provided in Part 3 of this draft Brief. To summarise, the following site specific planning considerations will impact on the development of the site:
- The St Clements Hospital is identified on the adopted UDP Proposals Map as a site for social and community facilities;
 - The site contains two Grade II Listed Buildings;
 - The front wall, gate, gate piers along the Bow Road frontage are also listed;
 - The Hospital lies within the Tower Hamlets Cemetery Conservation Area;
 - There are general restrictions on advertisements, for example in terms of size and illumination;
 - There is a Tree Preservation Order (TPO) that affects the property. However, in view of the Conservation Area designation affecting the site all trees are treated as though they were the subject of a TPO and thus the Council's consent is required before any tree can be cut, lopped or, pruned;
 - The Tower Hamlets Cemetery (to the south of the site) is designated as Metropolitan Open Land and as a Site of Nature Conservation Interest.

3. Planning Policy Framework

- 3.1 Section 54A of the Town and Country Planning Act 1990 requires that planning applications are determined in accordance with the provisions of the relevant development plan, unless material considerations indicate otherwise.
- 3.2 In considering the development potential of the property, it is therefore important to consider the policy framework within which any decision on a planning application for development or change of use would be made.
- 3.3 In accordance with national, strategic and local policy guidelines, this draft Brief seeks to encourage high density, sustainable and comprehensive redevelopment consistent with the previously developed nature of the site and its urban location, in a manner that also respects its setting.
- 3.4 The key relevant planning policy guidelines are outlined below. Other policies and guidance will also be taken into consideration in the Council's assessment of any planning applications submitted.

National Planning Policy Guidance

- 3.5 Planning Policy Guidance Notes (PPGs) provide a framework and guidelines for the creation of regional and local planning policy, and constitute a consideration in the determination of planning applications. The following PPGs are considered to be of most relevance for an assessment of proposals for the redevelopment of the St Clements Hospital site.

Planning Policy Guidance Note 1 (PPG1) – General Policy and Principles 1997

- 3.6 PPG1 aims to promote sustainable development principles in planning the environment. It addresses urban regeneration and the re-use of previously developed land, and identifies ways in which mixed-use development can be promoted to create vitality, diversity and reduce the need to travel. PPG1 also highlights the role of design considerations within the planning process and aims to secure good design in all developments.
- 3.7 A revised version of PPG1 (PPS1 – Creating Sustainable Communities) has recently been published by the Government. This reinforces the need for new development to meet the objectives of sustainability.

Planning Policy Guidance Note 3 (PPG3) – Housing 2000

- 3.8 PPG3 offers guidance relating to the provision of housing. The Government's objectives aim to:
 - meet the housing needs of all in the community, including those in need of affordable housing;
 - promote more sustainable patterns of development and make better use of previously developed land, with a focus on additional housing in existing towns and cities;
 - encourage high quality design and ensure that new housing developments make a contribution towards promoting urban renaissance and improving quality of life.

- 3.9 In securing a sufficient supply of housing, local planning authorities are advised to give priority to re-using previously developed land and the conversion and re-use of existing buildings within urban locations in preference to the development of greenfield sites. PPG3 also advises local authorities to promote:
- development that is linked to public transport;
 - mixed use development;
 - a greener residential environment;
 - greater emphasis on quality and designing places for people; and
 - the most efficient use of land.
- 3.10 In making the most efficient use of land, local planning authorities are advised to encourage development of between 30 and 50 dwellings per hectare, and to seek greater intensity of development in locations with good public transport accessibility.
- 3.11 Where there is a demonstrable lack of affordable housing, identified through an up to date housing needs assessment, PPG3 advises local planning authorities to negotiate for the provision of an element of affordable housing on suitable sites. Decisions on the appropriate level of provision should be made taking into account individual site characteristics. Further guidance on assessing site suitability and the appropriate level of provision is set out in Circular 6/98.

Planning Policy Guidance Note 13 (PPG13) – Transport 2001

- 3.12 The revised version of PPG13 was adopted in March 2001. The guidance aims to promote improved integration between modes of transport, policies for the environment, land use planning and the community.
- 3.13 The key objectives of PPG13 are to reduce growth in journey length and numbers by motorised transport; encourage alternative transport modes; and reduce reliance on the private car. The guidance recommends that this should be done through ensuring development takes place in locations that are accessible by public transport and encourage walking and cycling. Parking provision within a development should be limited to discourage reliance on the car.

Planning Policy Guidance Note 15 (PPG15) – Planning and the Historic Environment 1994

- 3.14 PPG15 provides comprehensive advice on controls for the protection of listed and historic buildings and conservation areas. It highlights the requirement to reconcile the need for economic growth with the need to protect the historic environment and recognises that these can be complementary objectives.
- 3.15 There is a general presumption in favour of the retention of Listed Buildings. When considering an application for planning permission for development that may affect a Listed Building, local planning authorities are required to have special regard to the desirability of preserving the setting of that building.

- 3.16 Paragraphs 3.8 to 3.11 are particularly relevant in terms of advice on the re-use of listed buildings, where these are to be retained. PPG15 states that generally the best way of securing the upkeep of historic buildings and areas is to keep them in active use and recognises that, for the majority of cases, this means an economically viable use, which will often necessitate some degree of alteration.
- 3.17 PPG15 comments that the best use is often the use for which a building was originally designed, but recognises that not all original uses will be viable or appropriate and states that policies for development and listed building controls should recognise the need for flexibility where new uses have to be considered to secure a building's survival.
- 3.18 Paragraphs 3.12 to 3.15 deal with alterations and extensions to Listed Buildings. The guidance recognises that many listed buildings can sustain some degree of sensitive alteration or extension to accommodate continuing or new uses.
- 3.19 In exercising their planning functions in conservation areas, local planning authorities are also required to pay special attention to the desirability of preserving or enhancing the character or appearance of the area in question. The general presumption is in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area.

The London Plan

- 3.20 The London Plan was formally adopted in February 2004 and provides a Spatial Development Strategy (SDS) for the Capital. There is a requirement that all unitary development plans should be in 'general conformity' with the London Plan. The Government has advised that it is only where an inconsistency or omission would cause significant harm to the implementation of the SDS that a UDP should be considered not to be in general conformity. Furthermore, the fact that a UDP is inconsistent with one or more policies in the SDS, either directly or through the omission of a policy proposal, does not, by itself, mean that the UDP is not in general conformity.
- 3.21 Planning applications that do not accord with the proposals in the UDP and which involve more than 2,500 sqm of floorspace in any Use Class (except Class C3) or more than 150 residential units must be referred to the Mayor.
- 3.22 The Mayor has introduced sub-regions as the best way to develop the strategic policies in the London Plan and to provide a focus for their implementation. Tower Hamlets is located within the East London sub-region. There is a commitment to identifying capacity to accommodate new job and housing opportunities and appropriate mixed use development; maximise the number of additional homes, including affordable housing; and ensure that social and community infrastructure is retained, enhanced and expanded where needed.
- 3.23 In terms of environment and design, Boroughs are encouraged to protect and enhance London's historic environment (Policies 4B.10 and 4B.11). Boroughs should also support schemes that make use of historic assets and stimulate environmental, economic and community regeneration (Policy 4B.12).

- 3.24 Policy 4B.1 identifies the design principles that the Mayor will encourage in seeking to meet the objective of creating a compact city and will be used in assessing planning applications for the St Clements site.
- 3.25 The London Plan (Policy 3A.18) supports the provision of additional healthcare facilities within Boroughs as identified by the strategic health authorities and primary care trusts. It states that the preferred locations for hospitals, primary healthcare centres, GP practices and dentists should be identified in appropriate locations accessible by public transport.
- 3.26 Policy 3A.17 encourages UDP policies to promote the objectives of the NHS Plan, Local Delivery Plans and Modernisation Programmes and the organisation and delivery of health care in the borough, in partnership with the strategic health authorities, primary care trusts and Local Strategic Partnerships.
- 3.27 A key objective underlying the London Plan is to secure more housing and the Mayor has set an overall strategic target for London for the provision of 30,000 new homes per annum (with a minimum of 23,000 per annum in the period up to 2006). The total target for Tower Hamlets is 41,280 additional homes between 1997 and 2016, with a monitoring target of 2,070 per annum.
- 3.28 The Mayor defines affordable housing (Policy 3A.6) as 'social housing, intermediate housing and in some cases, low cost market housing'. This definition includes key worker housing. The London Plan includes a strategic target (Policy 3A.7) that 50% of all new homes are affordable. Within that target, there is a London-wide objective of 70% social housing and 30% intermediate (including key worker).
- 3.29 At paragraph 3.83, the London Plan acknowledges the shortage of affordable housing for key workers on low incomes and recognises that this is causing a serious skills shortage in many key public sector institutions, including the NHS. The importance of affordable housing is identified as being critical for the recruitment and retention of NHS staff.
- 3.30 In negotiating for an element of affordable housing, Boroughs are advised (Policy 3A.8) to seek the maximum reasonable amount of affordable housing having regard to their affordable housing targets, the need to encourage rather than restrain residential development and the individual characteristics of the site. However, the London Plan advises that targets should be applied flexibly taking account of individual site costs, the availability of public subsidy and other scheme requirements.
- 3.31 The London Plan (Policy 4B.3) encourages development proposals that maximise the potential of sites, and aims to ensure that proposals achieve the highest possible intensity of use compatible with local context, design principles and public transport capacity.
- 3.32 The Plan includes a density matrix (Table 4B.1) providing a strategic framework for appropriate densities at different locations, depending on their accessibility by public transport, existing building form and massing and the nature of residential development proposed.
- 3.33 Policy 4B.7 seeks to ensure that development proposals respect local context and communities and preserve or enhance local social, physical, cultural, historical, environmental and economic characteristics. The London Plan

(Policies 4B.4 and 4B.5) also seeks to enhance the quality of public realm and create an inclusive and accessible environment through development proposals.

Tower Hamlets Unitary Development Plan

- 3.34 The Tower Hamlets UDP was adopted in 1998. A summary of the key policies that are relevant to the redevelopment of the St Clements site is summarised below. The UDP is currently under review and a First Deposit Draft UDP (Deposit Plan) was published for public consultation on 27 May 2004. The emerging UDP will gain weight as a material consideration as it goes through the process to adoption. The draft policies of relevance are also referred to below.
- 3.35 The Council's interpretation of the policies for this site is provided in the Planning Principles at Part 4 of the draft Brief.

The St Clements Hospital Site

- 3.36 The UDP highlights the Council's concern to ensure that land and buildings previously used for health care, that are no longer required for operational purposes, are released and made available for other uses in accordance with the land use and environmental policies of the UDP.
- 3.37 The St Clements Hospital is designated as Social and Community Facilities on the adopted UDP Proposals Map. Schedule 2 of the UDP (Commitments and Proposals) identifies it for "institutional use, including education".
- 3.38 The Deposit Draft Plan includes the site within Schedule E "Social Facilities". The Schedule states under the preferred use for the site that a 'Development Brief' is required. The Schedule does not currently specify the preferred use. However, it is anticipated that this part of the plan will be amended through the UDP process to reflect the Planning Brief.

Housing

- 3.39 The Council has a borough-wide housing target in the adopted UDP to secure 15,000 dwellings between 1987 and 2006 (policies HSG1 and HSG2). In accordance with the London Plan, the Deposit Plan updates this target and states that the Council will meet and where possible exceed the Borough housing target of 41,280 over the Plan period to 2016 (Policies HSG1 and SP4).
- 3.40 The adopted strategic policies ST20 to ST25 have particular relevance to housing development. The UDP outlines the Council's requirement that development provides sufficient housing of a high quality to meet the varied needs of the Borough's residents. The UDP also aims to achieve the creation of a satisfactory residential environment and secure the provision of affordable housing.
- 3.41 Policy HSG2 states that new housing development will normally be permitted on sites in non-residential use if a number of criteria are met. One of the criteria states that the land should not be shown on the Proposals Map as being required for any other use. The St Clements site is allocated for institutional use. However, this allocation was formulated before the operational requirements of the Trust were finalised and is to be amended through the UDP review process.

- 3.42 Policy HSG2 also requires that proposals for residential development should not conflict with any other policies in the Plan. Additionally, it advises that the environment is, or can be made, suitable for residential use and that the locality is, or will be, adequately provided with services needed by residents.
- 3.43 Policy HSG2 of the Deposit Plan states that the Council will assess the capacity of the social and physical infrastructure as a result of development, and may phase approvals based on capacity. In addition revised Policy HSG2 indicates that master plans and development briefs will be prepared for larger sites, to ensure capacity issues are determined in a holistic way, in accordance with the relevant Schedules and the Area Action Frameworks.

Affordable Housing

- 3.44 The adopted UDP states that the Council will seek a reasonable provision of affordable housing where development proposals comprise 15 dwellings or more. The proportion of affordable housing will be decided taking into account the individual merits of each case and the Council's strategic target for 25% of all new housing to be affordable (Policy ST21). This target is to be revised as part of the UDP review process.
- 3.45 Policy HSG3 seeks to ensure that affordable housing is retained for future occupiers through the use of planning conditions and obligations and / or the involvement of Registered Social Landlords.
- 3.46 Provision for residents with special needs is strongly encouraged by the Council in Policy HSG14. This includes key workers identified by the Council as requiring short-term accommodation, for example teachers and nurses.
- 3.47 Additionally, the Council prepared Supplementary Planning Guidance (SPG) on affordable housing in February 2000, which aims to assist developers of residential schemes in the interpretation and application of the affordable housing policies HSG3 and ST18a.
- 3.48 The SPG reinforces the requirement for affordable housing contributions to apply to all residential development above the threshold of 15 units or above 0.5 hectares. This can be provided on-site, part on-site and part off-site, total provision off site or as a commuted payment.
- 3.49 The SPG confirms that where affordable housing is provided on-site, the Council will seek to secure at least 25% of the total development as affordable. The Council will apply the affordable housing policies with flexibility, taking account of the individual site circumstances. In the event that affordable housing is to be provided off-site, 33% of the principal unencumbered development shall be provided for affordable housing. The Council's strong preference is for affordable housing to be provided on-site.
- 3.50 The SPG also confirms that the Council would prefer to secure a range of units as part of the affordable housing provision, ranging from 1 bedroom units to 5/6 bedroom units. The mix will be dependant on the size of the development and the nature of the site. The Council will give consideration to the proximity of local facilities, e.g. shops, transport, schools, when assessing an appropriate mix.
- 3.51 The Council recognises that physically accommodating a mix of affordable housing units on a site requires a degree of flexibility and the Council will take into account the individual circumstances of the site and the proposed

development. The SPG states that in appropriate cases the proportion of affordable housing could be based upon habitable rooms instead of pro-rata to the units of the private development.

- 3.52 The affordable housing target is increased within the Deposit Plan and the Council is now seeking to ensure that 35% of the gross floorspace of the development is provided as affordable housing on-site on all housing sites including those in mixed-use with the capacity to provide 10 units or more - provision will increase to 50% if provided off-site (Policies HSG4 and SP5).
- 3.53 The supporting text to Policy HSG4 states that the percentages of affordable housing required as part of individual development proposals will be assessed against the needs of the local community and any other social benefits that will result as part of the development.
- 3.54 The Deposit Plan requires all new residential, mixed-use developments and redevelopment schemes to comprise a mix of affordable and intermediate market housing (Policy HSG5). Policy HSG5 further states that that the Social Rented to Intermediate ratio split for affordable housing will be 80:20.
- 3.55 The Council is also seeking to ensure through planning conditions and legal agreements that affordable housing provision remains available for successive occupiers as well as initial occupiers of the property (Policy HSG7, Deposit Plan).

Housing Mix and Density

- 3.56 In the adopted UDP, the Council requires the mix of types and size of housing in any new housing development to reflect Borough-wide housing needs, local housing requirements and the nature of the specific site. Policy HSG7 states that new housing developments will be expected to provide a mix of unit sizes, where appropriate, including a substantial proportion of family dwellings of between 3 and 6 bedrooms. Where development of 30 dwellings or more is envisaged, the policy advises that family dwellings should normally be in the form of family homes with private gardens.
- 3.57 Policy HSG8 requires, on suitable sites, the provision of dwellings to wheelchair standards and a substantial provision of dwellings designed to accord with mobility standards, as defined in planning standard 5: Access for People with Disabilities.
- 3.58 The Deposit Plan Policy on 'Dwelling Mix and Type', now Policy HSG8, is more general and states that the Council will ensure that housing accommodation in new residential developments and mixed-use schemes include housing types and sizes to meet local needs.
- 3.59 The emerging UDP also requires that all new residential units meet 'Lifetime Homes' standards and 10% of new housing must be specifically designed to wheelchair / mobility standards (Policy HSG10, Deposit Plan).
- 3.60 In terms of density, the adopted UDP advocates a maximum of 247 habitable rooms per hectare (hrh) (Policy HSG9) or a maximum of 210 hrh when developments schemes include, or are predominantly, homes for families (Policy HSG10). These figures represent an approximate guide and higher densities are allowed if certain criteria (as set out in HSG9) are met. These standards are recognised by the Council as being out of date.

- 3.61 Policy HSG9 of the Deposit Plan provides an update on housing density and states that the highest development densities will be sought throughout the Borough as detailed in Standard 2 of the Plan.
- 3.62 Planning Standard No.2 details the Council's updated position on density standards and introduces a Tower Hamlets Density Matrix. Standard No.2 refers to Transport for London's London-wide public transport accessibility indicator (PTAL) which aims to assist locational planning. The method allows differences in public transport to be taken into account. In determining residential densities for a site the Tower Hamlets Density Matrix highlights the significance of public transport accessibility, using the PTAL scoring method.
- 3.63 Planning Standard No.2 states that Tower Hamlets location demonstrates a high level of accessibility across the Borough scoring a PTAL range of 4-6 (good and very good accessibility to public transport). The St Clements site is identified as having a PTAL score of 6a.
- 3.64 The suggested residential densities for areas with a PTAL score of between 4 and are as follows:
- 450 – 700 (165 – 275 units per hectare) for flat development;
 - 200 – 450 (55 – 175 units per hectare) for terraced houses.
- 3.65 The Council requires all new housing development to include an adequate provision of amenity space.

Mixed Use Development

- 3.66 Policy DEV3 encourages mixed use development as a basis for maintaining local character, vitality and diversity. The policy is subject to a number of criteria relating to the scale and nature of development and the physical constraints of individual sites. Policy EMP2 of the Deposit Plan promotes mixed-use development, particularly in areas with good public transport accessibility subject to a number of criteria similar to those contained in adopted Policy DEV3.
- 3.67 The Council considers that the combination of locational, environmental and mixed-use policies, can, by reducing the need to travel, help promote environmental and energy efficient objectives and provide substantial economic benefits. The Deposit Plan recognises that mixed-use schemes can provide an opportunity to increase densities in a sustainable manner where there is good access to public transport.

Controlling Impact of Development

- 3.68 Policy DEV2 of the adopted UDP sets out policy concerned with mitigating negative impacts on the amenity of residents and the environment generally, ensuring their protection at all stages of development. The policy states that occupiers in adjacent buildings should not be adversely affected by new development, for example through loss of privacy or daylight.
- 3.69 Policy ENV1 of the Deposit Plan concerns amenity and states that permission will not be granted for development that causes demonstrable harm to the amenity of occupiers or neighbours. The Policy lists a number of factors that the Council will consider in making its assessment.

Design and Conservation Considerations

- 3.70 Policy DEV1 of the adopted UDP states that all proposals for development should take into account, and be sensitive to, the character of the surrounding area in terms of design, bulk, scale and use of materials. The development should be visually appropriate to the site and its setting and take account of street frontages, existing building lines and street patterns.
- 3.71 Policy UD1 of the Deposit Plan sets a number of criteria that proposals must meet in in terms of scale and density. Policy UD2 sets out a number of elements that proposals will be assessed against in terms of architectural quality.
- 3.72 The Council expects separate Design Statements and Access Statements to be submitted as part of planning applications for most new developments (Policy UD4, Deposit Plan).
- 3.73 The adopted UDP identifies high buildings as being acceptable outside of the Central Areas Zone, subject to considerations of design, siting, the character of the locality and their effect on views (Policy DEV6).
- 3.74 The Deposit Plan considers locations that are suitable for tall buildings in Policy UD7. Applications for tall buildings and large developments, outside of the Area Action Frameworks and sites listed in Schedule A of Plan, will be favourably considered in locations with excellent public transport facilities and against a number of criteria.
- 3.75 Where developments are proposed in conservation areas, the Council will pay special attention to the desirability of preserving or enhancing the character and appearance of the area (Policy DEV25 of the adopted UDP and Policy UD22 of the Deposit Plan). New uses will be permitted in conservation areas, except where there would be a detrimental impact on the character, fabric or appearance of the area or its setting.
- 3.76 Proposals for the demolition of buildings in conservation areas will be considered against a number of criteria including, the condition of the building; the likely cost of the repair or maintenance of the building; the adequacy of efforts to maintain the building in use and the suitability of any proposed replacement building (Policy DEV28 of the adopted UDP and Policy UD23 of the Deposit Plan).
- 3.77 Policies DEV36 to DEV41 of the adopted UDP are relevant for proposals involving listed buildings. Policy DEV36 (Policy UD19 Deposit Plan) states that consent will not normally be granted for the demolition or partial demolition of any listed building except where a strong case for demolition exists. Any case should have regard to the relative importance of the building both architecturally and historically; the condition of the building and the estimated costs of repair and maintenance; and the importance of any alternative use for the site.
- 3.78 Policy DEV37 of the adopted Plan states that proposals to alter listed buildings will be expected to preserve the special architectural or historic interest of the building.
- 3.79 Development proposals which would adversely affect the setting of a listed building will be resisted (Policy DEV39). Where a change of use is proposed, this may be acceptable providing the proposed use will not be detrimental to

the building or the character of its setting and a detailed refurbishment scheme is submitted.

- 3.80 Policies UD17 and UD18 of the Deposit Plan also concern listed buildings. Policy UD17 seeks to protect and enhance listed buildings and their settings, whilst Policy UD18 states that the Council will consider new uses for long term vacant listed buildings in a flexible way, where new uses respect the character of the building and its setting and enable it to be kept in good repair.

Landscaping

- 3.81 Policy DEV1 of the adopted UDP states that development proposals need to include provision for the design of 'external treatments' and landscaping. This issue is considered in further detail in Policies DEV12 and DEV13. Good quality landscaping is a requirement of redevelopment schemes. Policy UD11 of the Deposit Plan requires a fully documented landscape plan to be prepared for all new development, excepting minor works.
- 3.82 Policy DEV16 of the adopted UDP requires works to trees subject to a TPO to be carried out in accordance with the relevant British Standard. Policy DEV15 seeks the retention or replacement of existing mature trees in development proposals, where the trees are considered by the Council to be of townscape or environmental value.

Environment

- 3.83 The adopted UDP provides a framework to protect and improve the environmental quality and amenity of the Borough (policies ST4 to ST7). It is a requirement that any new development respects the built environment in addition to contributing to the creation of a safe, welcoming, attractive and accessible environment. Design proposals should be sensitive to the character of the surrounding area with regard to massing, scale, density and use of materials.

Sustainable Development

- 3.84 A key strategic objective of the adopted UDP is the principle of sustainable development (ST3 and ST7) and the Council strongly encourages energy efficiency in design. The need to achieve sustainable development is also incorporated in Policy DEV2(4).

Equal Opportunities

- 3.85 Policies DEV1(4) and HSG8 of the adopted UDP state that the Council will expect adequate access for people with disabilities to be provided in respect of site layout and the provision of access to public buildings. Ground floor units should be fully wheelchair accessible and the outdoor layout should be well lit and safe. The Council will seek to negotiate some provision of dwellings to mobility standards.

Contaminated Land

- 3.86 Policy DEV5 of the adopted UDP refers to the development of sites where land may be contaminated. The policy requires that proposals on such land must be accompanied by a detailed soil survey with a program of remedial works. Development will not normally be allowed to start before the agreed remedial treatment has commenced.

Community Facilities

- 3.87 Policy STR49 of the adopted UDP supports the provision of community facilities in suitable locations to meet the needs of local residents.
- 3.88 Primary health care facilities will be favourable considered in residential areas, providing that the amenity of the area is not adversely affected. The UDP requires that these types of facilities be well located to enable easy access for residents (Policy SCF4).
- 3.89 Policy SCF9 states that planning permission for change of use from community use will normally be granted except where a local need still exists; the building is still capable of being put to such use; and the building is well located in relation to its likely catchment area.
- 3.90 The Deposit Plan states that the Council will ensure that the ability of all residents to access the social facilities they need by public transport, will be maintained and preferably enhanced. The Council will require any development that displaces existing or increases the need or demand for social facilities to provide or contribute to new or existing provision to meet identified demands on or off-site (Policy SF1).
- 3.91 The Council also recognises that whilst some facilities still meet the needs of the community, other buildings are often run down and surplus to requirements.

Transport

- 3.92 Strategic Policies ST27 to ST29 of the adopted UDP aim to restrain the unnecessary use of private cars and ensure that development is located to allow transport needs to be efficiently and safely accommodated within the existing and proposed transport system. This is a key concern of the Council and is reiterated in Policy T9, which sets out the Council's aim to discourage non essential car journeys, and Policy T15, which directs new development to locations near adequate transport systems.
- 3.93 Linking transport and development is also identified as a key planning principle in the Deposit Plan. Policy TRN1 states that the Council will focus high-density development in areas of high public transport accessibility (see above comments on the Council's PTAL scoring).
- 3.94 Policy T16 of the adopted Plan states that in considering new development proposals, the Council will take account of the operational requirements of the proposed use and the impact of the traffic that is likely to be generated.
- 3.95 The UDP sets out parking standards in Policy T17 and Planning Standard No.3. These require that all new housing development must provide 1 off-street parking space per dwelling to be provided in individual spaces or small groups designed to fit in with overall landscaping proposals rather than in large separate units.
- 3.96 Planning Standard 7 of the Deposit Plan sets out the Borough's updated parking standards. For large residential developments in areas with good public transport (PTAL between 4 and 6), the maximum off-street parking is set at 50% for all residential units. Lower levels of parking are encouraged in areas scoring between 5, 6a and 6b. A full Transport Assessment is required for development proposals comprising 100 dwellings or more.

- 3.97 Planning Standard 8 promotes the preparation of Travel Plans to be submitted with development proposals.
- 3.98 Policies T18 to T24 of the adopted UDP indicate that priority will be given to the safety and convenience of pedestrians and cyclists.

Planning Obligations

- 3.99 Policy DEV 4 of the adopted UDP (Policy IM1 of the Deposit Plan) states that the Council will seek to enter into planning obligations as appropriate with developers and landowners which are reasonably related to the scale and nature of the proposal and are necessary for the development to proceed.
- 3.100 The Deposit Plan (SP 23) states that the Council will seek to secure through s106 Planning Obligations, infrastructure and community benefits in accordance with appropriate legislation and guidance.

Supplementary Planning Guidance

- 3.101 In addition to the affordable housing SPG the following SPG Notes are relevant to the redevelopment of this site:
- Supplementary Planning Guidance – Landscape Requirements
 - Supplementary Planning Guidance – Securing a Safe Environment
 - Supplementary Planning Guidance – Residential Space
 - Supplementary Planning Guidance – Designing out Crime (Parts 1 and 2).

4. Planning Principles

- 4.1 The St Clements Hospital site is identified for institutional use in the adopted UDP and shown on the Proposals Map (number 87) as "Social and Community Facilities". However, the clinical services currently located at St Clements Hospital are to be transferred to a new, purpose built, Adult Mental Health Facility at Mile End Hospital (also within the London Borough of Tower Hamlets) in October 2005. The ongoing requirement for health care facilities at St Clements will be of a much smaller scale and therefore the majority of the site will become surplus to requirements and will be available for alternative uses.
- 4.2 On the basis of the planning policies and conservation issues associated with the site and surrounding area, the following Planning Principles are appropriate to guide the redevelopment of the St Clements Hospital site.

Land Uses

- 4.3 Given the characteristics of the site, the nature of the surrounding land uses and the Borough's housing needs, in circumstances where all or part of the site is no longer required for health care uses, the Council will support the use of surplus land for primarily residential purposes with essential healthcare facilities.
- 4.4 The Council will require a comprehensive approach to the redevelopment of the site redevelopment that meets its policy objectives.

Ongoing Health Care Requirements

- 4.5 The London Borough of Tower Hamlets and the NHS are committed to providing further improvements to healthcare facilities within the Borough. These are outlined in Part 2 of the draft Brief.
- 4.6 As part of any redevelopment of the St Clements site, the Council will support the provision of a primary health and social care resource centre including the provision of a Specialist Physical and Sensory Disability Centre for Independent Living.
- 4.7 The facility will have a total floor area of 3,000 sqm gross, which must be designed to disability standards. The provision of up to 10 parking spaces to support the facility is considered to be appropriate. The preferred location for the facility is at the northern part of the site, close to Mile End Road.

Affordable and Key Worker Housing

- 4.8 When considering proposals that involve the redevelopment of the St Clements site for residential purposes, the Council will seek an element of affordable housing. Affordable housing includes social housing for rent, intermediate housing (including key worker accommodation) and low cost market housing.
- 4.9 Taking into account the requirements of the Council's adopted and emerging affordable housing standards and the strategic target included in the London Plan, the Council will be seeking at least 35% of the total housing provision as affordable. On-site provision will be required.

- 4.10 The precise level and mix of affordable housing that is appropriate will be determined in the context of the Council's Housing Needs Study and taking into account individual site costs. Other factors that will be taken into consideration include the wider benefits provided by the scheme in terms of delivering primary health care facilities and the need to address conservation issues.
- 4.11 The Council's preference is to calculate affordable housing provision on the basis of the total gross floor area provided.
- 4.12 The Council will seek the affordable housing allocation to be split 80:20 (social:intermediate). The Council recognises that the Trust has a requirement for key worker housing on the St Clements site and will allow all the intermediate element to be provided as key worker housing. The Council will require the majority of the social element to be provided as low cost housing for rent. A range of tenures will be encouraged for all elements of affordable housing provision.

Housing Mix and Type

- 4.13 In considering proposals for residential development the Council will aim to secure a mix of unit types and sizes, having regard to the requirements of Policy HSG7 of the UDP and its Housing Needs Study.
- 4.14 The Council will expect a high proportion of family accommodation (of between three and six bedrooms) as part of the affordable housing provision, mixed with one and two bedroom units.
- 4.15 A high proportion of smaller units (one and two bedrooms) will be acceptable as part of the market housing, mixed with some three bedroom family units.

Conservation and Design

- 4.16 St Clements Hospital is located within the Tower Hamlets Cemetery Conservation Area and has two substantial Grade II Listed Buildings on site. Therefore, any redevelopment proposals will need to be of good design quality respecting the setting of the listed buildings and character and appearance of the Conservation Area.
- 4.17 There is a policy presumption to protect listed buildings and to retain all buildings in a conservation area that preserve or enhance its character.
- 4.18 In this case, the Council will support the sensitive conversion of the Listed Buildings and other buildings which make a contribution to the character and appearance of the Conservation Area, and the redevelopment of other parts of the site.
- 4.19 An independent assessment of each of the buildings on the site has been carried out by conservation experts, Feilden and Mawson, in terms of their historic and architectural merit and any contribution made to setting of the listed buildings and the character and appearance of the Conservation Area.
- 4.20 The buildings have then been graded in terms of their merits and the scope for any alteration / demolition, as follows:
 - **Grade A:** buildings with historic and / or architectural merit, which should be retained;

- **Grade B:** buildings with some merit, where alteration or demolition may be appropriate subject to an assessment of the overall architectural and historic interest of the building, and also subject to the design of any replacement building enhancing the setting of the listed buildings and character and appearance of the Conservation Area;
 - **Grade C:** buildings with little or no merit, where demolition is considered to be appropriate.
- 4.21 A map showing the grading of each of the buildings is included at Appendix 3, together with summary building descriptions. These have been agreed with English Heritage. A detailed background to this analysis is set out in the separate Feilden and Mawson Conservation Appraisal.

Density, Massing and Height

- 4.22 Given the previously developed nature of the site, it's accessibility by public transport, the existing urban form and opportunities to secure a quality residential environment, the Council will seek to secure that any redevelopment proposals achieve the most efficient use of the site, provided this is compatible with local context, design principles and public transport capacity.
- 4.23 The key factors in determining the appropriate density, massing and height of new development will be the need to preserve the setting of the retained Listed Buildings and the character and appearance of the Conservation Area; and the effect of proposals on the amenity of the surrounding residential properties, taking into account daylight and privacy issues.
- 4.24 Other relevant factors that will be taken into consideration include the height of the existing buildings on site, and those in the surrounding area.
- 4.25 It is considered that a range of building heights could be accommodated across different parts of the site. The potential for tall buildings will be dependant on detailed design and the ability of the applicant to demonstrate that the factors identified at paragraphs 4.22 to 4.24 above have been addressed.
- 4.26 The Council will support proposals for residential development that achieve a density within the 450 to 700 habitable rooms per hectare range identified in the London Plan and the emerging UDP. However, it is important that the overall composition, character and design of the development is balanced to meet housing demand whilst addressing the factors identified at paragraphs 4.22 to 4.24 above.

Open Space

- 4.27 The development of a new residential community will require the provision of an appropriate quantity of open space within the site. This should include the provision of green play space.

Amenity

- 4.28 The Council will require that any new development does not adversely affect the amenity of existing residents in the surrounding area.

- 4.29 The design of new development should also secure a high quality of amenity for new residents. The Council considers that balconies and terraces contribute to the amenity of residential properties.

Permeability

- 4.30 At present there is no public access through the St Clements site.
- 4.31 The redevelopment of the site for a residential scheme will offer opportunities to increase permeability and create new public routes through the site, for example the provision of a link to the public footpath at the rear of the site's southern boundary.

Access

- 4.32 There is at present one vehicular access to the site from Bow Road.
- 4.33 The potential for additional points of vehicular access (for example from British Street) will be dependant on meeting highways and conservation criteria and by agreement with relevant landowners.
- 4.34 The needs of disabled people should be considered at all stages of the development, ensuring that residential areas have safe access arrangements. An Access Statement will be required to address this issue.

Parking

- 4.35 In considering proposals for redevelopment, the Council will have regard to PTAL indices, which recognise the St Clements site as falling within a highly accessible area. Overall, the Council will seek to minimise the impacts of traffic and on-site parking and opportunities to reduce car parking numbers will be encouraged. Consideration will need to be given to screening, greening and softening the impact of car parking. A Travel Plan will be required to be submitted in support of any planning application.

Sustainable Development

- 4.36 The development should reflect the principles of sustainable development as outlined in the Council's adopted UDP (Policy DEV2(4), Policy ST3 and ST7).
- 4.37 Redevelopment should achieve the four aims of sustainability as set out in the Government's 'A Better Quality of Life (1999)': meet the needs of everyone; effective protection of the environment; prudent use of natural resources; maintenance of high and stable levels of economic growth and employment.

Designing Out Crime

- 4.38 Designing out crime means removing the opportunity for crime and reducing the fear of crime through the built environment. The design of public space to provide safety can be achieved by designing for natural surveillance and human presence and designing-in territoriality and community involvement.
- 4.39 Natural surveillance relies on observation – by making buildings front into the public realm, careful orientation of entrances and windows, designing an integrated network of streets and careful soft landscaping can ensure surveillance and self-policing. Distinguishing between the public and private realm will deter intruders from private spaces.

- 4.40 The redevelopment of the St Clements site needs to ensure integration into the existing townscape and therefore crime prevention measures should enhance permeability and avoid 'gating' the site from its surroundings.
- 4.41 Lighting provides essential safety and security along highways and footways but innovative lighting design can also enliven and animate public spaces. Low maintenance energy efficient lighting systems should be adopted. Prevention of unnecessary light leakage and maximising the effectiveness of light sources should not inhibit innovative animation of public spaces and building frontages.

5. Planning Application Process

Consultation

- 5.1 Prior to the submission of planning, listed building and conservation area applications to the London Borough of Tower Hamlets the applicant should hold early discussions with the Major Project Development and Strategic Applications, conservation and traffic and transportation sections of the Council. Early discussions with the GLA and English Heritage are also recommended.

Form of Submission

- 5.2 Applicants will be expected to demonstrate how their development proposals comply with the objectives of this Brief. In particular, applicants will need to demonstrate that their proposals:
- Address the Council's policies on conservation, transportation, housing, open space and built environment as set out in the adopted and emerging UDP;
 - Have regard to the London Plan and the Council's Supplementary Planning Guidance documents;
 - Achieve national planning policy objectives;
 - Respect the setting of the Listed Buildings on site and the character and appearance of the Conservation Area; and
 - Are aligned with principles of good urban design.
- 5.3 Planning, listed building and conservation area applications for a redevelopment scheme will need to be supported by the following:
- Planning statement
 - Conservation and listed building assessment
 - Transportation assessment, including Travel Plan
 - Design Statement
 - Access Statement
 - Arboricultural report
 - Landscape Statement

Environmental Impact Assessment

- 5.4 The need to undertake an environmental impact assessment (EIA) will be dependant on the nature and scale of the redevelopment scheme and the applicant is advised to confirm this with the Council at an early stage in pre-application discussions.
- 5.5 For an EIA to be required the proposals must constitute "EIA development" as defined at Part I (2) of the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations. In this respect, proposals could

be considered as Schedule 2 development, category 10 of which refers to urban development projects that exceed an area of 0.5 hectares.

Section 106 Agreements

- 5.6 The Council will require the applicant to enter into a Section 106 Agreement. Section 106 requirements will be subject to the guidance set out in Policy DEV of the adopted UDP.

6. Contacts

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