

**Application for Planning Permission**[click here for case file](#)

<b>Reference</b>	PA/21/02707
<b>Site</b>	Whitechapel Road Development Site, Whitechapel Road, London E1 2BB
<b>Ward</b>	Whitechapel
<b>Proposal</b>	<p>Redevelopment of site involving erection of five buildings and retention of one building for provision of up to 69,033 sqm (GIA) of Class E(g) space for flexible life science purpose uses; and provision of up to 6,363 sqm (GIA) flexible Class E supporting uses and Class F1 and Class F2 supporting uses (gallery/ exhibition/ community uses); up to 2,820 sqm (GIA) F1(a) for research and development and teaching activities in the life science sector; with associated landscaping; public realm and highway works; re-provision of existing on-street car parking; and erection of a single pavilion building comprising up to 759 sqm (GIA) Class E(b) café use with ancillary storage, and Sui Generis use (public toilets) set within a new landscaped open square. The development is to involve erection of a building up to 4 storeys on Plot A (including top storey plant); and erection of two buildings (on Plots B1 and B3) of 4 storeys rising to 8 storeys respectively (the latter including top storey plant) including the demolition of former Outpatient's Building Annexe and part demolition/part retention of main former Outpatient's Building; and on Plot B2 the retention of the Ambrose King building. The development is to also involve the erection of a 7 storey building (including top storey plant) on Plot C (45.9m AOD); and erection of 15 storey building (including 2 top storeys of plant) on Plot D1 (78.7m AOD).</p> <p>The application is accompanied by an Environmental Statement.</p>
<b>Summary Recommendation</b>	Grant planning permission with conditions and planning obligations
<b>Applicant</b>	Department of Health and Social Care supported by NHS Property Services (NHSPS)
<b>Architect/agent</b>	Architects: Allies and Morrison (Plots A, B3, D1 and D2) and Gibson Thornley (Plots B1 and C). Planning agent: DP9.
<b>Case Officer</b>	Robin Bennett
<b>Key dates</b>	<ul style="list-style-type: none"><li>- Application registered as valid on 31/01/2022</li><li>- Significant amendments received on 28/09/2023</li><li>- Public consultation first round ended 21/03/2022</li><li>- Public consultation second round ended 22/01/24</li></ul>

## 1. BACKGROUND

- 1.1 This application was considered by the Strategic Planning Committee on 28 August 2024. A copy of the original report is appended to this report.
- 1.2 As set out in the draft minutes of the meeting, the Committee voted to defer the application in order to re-evaluate the contribution of the proposed development and to undertake a site visit.

### Site visit

- 1.3 The application was therefore deferred and a site visit took place on 24<sup>th</sup> September 2024. The site visit was attended by Councillor Amin Rahman, Councillor Iqbal Hossain, Councillor Gulam Kibria Choudhury and Councillor Ahmoudul Khan and two planning officers.
- 1.4 The site was observed from streets surrounding the application site as well as streets within the application site.
- 1.5 In addition, subsequent to the Committee meeting on 28 August a request was received from a resident of Gwynne House for Councillors to visit a second floor flat in Gwynne House so that the relationship between Gwynne House and Plot C to the west could be observed. During the site visit on 24 September Officers accompanied Councillors into the flat where the relationship between the living room of the flat and Plot C (currently occupied by the former dental hospital and former Barts and the London Students Union) was observed.

### The contribution of the development

#### *The local economic contribution*

- 1.6 Officers note that before Members moved to a vote on this item, it was expressed that the local economic contribution from the development would not be what would be expected, including in relation to the number of apprenticeships (that more than 68 construction phase apprenticeships should be possible) and the affordable workspace offer not meeting residents' requirements.
- 1.7 The scheme represents a significant potential investment in Whitechapel that would help to realise the strategic vision to provide a new world class life sciences cluster in proximity to the Royal London Hospital.
- 1.8 As set out in the published committee report, a bespoke package of public benefits has been negotiated with the applicant. These represent the unique nature of the development and align with the Council's Strategic Plan objectives. The package would go beyond the minimum requirements of planning policy. In terms of those parts of the package which are create a direct economic contribution in the Borough these are:

#### *Financial contributions*

- 1.9 A number of financial contributions totalling £6.9 million have been agreed with the applicant which would be secured in a legal agreement if permission is granted. These include £2.5m towards wellbeing, women's health and community health research (linked to LBTH Health Determinates Research Collaborations) and £1.7m towards employment skills and training initiatives.

### *Growth and Economic Development Benefits*

- **Affordable workspace** – 10% of the qualifying floorspace to be provided for 25 years. 65% of this affordable workspace to accommodate at least 40% wet lab with a 20% discount on market rates. 35% of the qualifying floorspace to be provided as entry level office space at a 50% discount on market rates. After 25 years space to be provided at 10% discount for further 10 years.
- **Access to employment** – 25% local procurement, 25% local labour in construction phase, 25% local labour in end use phase and 61 construction phase apprenticeships. The completed scheme is estimated would provide on-site up to 4,180 FTE end phase jobs of which an initial target of 1045 FTE jobs would be filled by local people.

In addition, following the 28 August 2024 Committee the applicant has improved their offer around access to employment and has now offered to ensure there will be a minimum of 20 apprenticeships in the end use phase of the development. This is a welcome and significant additional economic benefit in addition to the public benefits that were already agreed with the applicant at the time of publishing the 28 August 2024 committee report.

- 1.10 Beyond the above direct economic benefits associated with the proposed development which, if permission is granted, would be secured via a legal agreement a substantial set of further public benefits has been negotiated with the applicant in relation to public health, social mobility and education. These are summarised below and together will yield significant local socio-economic benefits.

### *Growth and Economic Development Benefits*

- Pathways into life sciences provisions – including provision of two officer posts (one senior and one junior) for a period of 10 years to support primarily young residents (primary, secondary and college) and their parents/carers understand the employment opportunities flowing from the development
- Skills Escalator – Programme to coordinate school work experience, internships, adult work experience placements and graduate paid placements across the masterplan area.
- Campus Strategy – to include details of an enterprise support programme and life science SME networking space).

### *Community Involvement Centre*

- A multi-purpose on-site space to be provided within the development for community use and offered to the Council.
- This may include space for community led public and patient involvement in research, research dissemination space, training, meetings and touch down space at peppercorn rents for community researchers, and volunteers working to coproduction principles in health and health determinants research.

### *Science Technology Engineering and Mathematics (STEM) provisions*

- Provision of an on-site Community Lab designed (and appropriately resourced in terms of staffing) to provide all Tower Hamlets schools with access to industry standard life science lab space to gain first-hand experience of life science activities and allow children to develop their analytical skills and gain insight into curriculum choices that will form a good platform to establish a future career in life sciences and STEM.

- Community Education and Outreach Programme – targeting life science focussed STEM provision for those in primary and secondary education in the borough’s schools and in the borough’s places of further education. Programme in place for continuous period of 20 years.
- Outreach activities to be appropriately resourced (Education/Outreach managers and educators) to have significant reach into the borough commensurate with the scale of the proposed development.
- Establish life science ambassador programme.
- Annual life science festival for life of development.

*Securing benefits to human health*

- Health Outcomes Strategy and Working Committee – Establishment of a group to foster collaboration between various stakeholders on a variety of topics, including reporting updates against agreed relevant strategies. This would bring various operators together to target maximising local human health improvement outcomes from the operation of the development bringing lab to bedside type initiatives to benefit local residents, Barts Trust NHS patients and those registered with through engaging with LBTH primary care providers.

*Lack of housing provision*

- 1.11 Officers note that before the vote to defer the fact that housing is not proposed the development was raised.
- 1.12 The site is located within a Local Plan Local Employment Location where employment development is expected as well as being within the Whitechapel South Site Allocation which requires development to be ‘employment-led (within the Local Employment Location) providing suitable units for the needs of life science, medical, research and educational uses associated with the Med City’. The proposed development is wholly in accordance with these Local Plan requirements.

**2. RECOMMENDATION**

- 2.1 That subject to any direction by the Mayor of London, **conditional planning permission is GRANTED** subject to the prior completion of a legal agreement to secure the planning obligations as outlined in the original committee report.
- 2.2 That the Corporate Director of Housing and Regeneration is delegated the power to negotiate the legal agreement. If within three months of the resolution the legal agreement has not been completed, the Corporate Director for Housing and Regeneration is delegated power to refuse planning permission.
- 2.3 That the Corporate Director of Housing and Regeneration is delegated the power to impose conditions and informatives relating to the list set out on pages 15-17 of the Update Report to the 28 August 2024 Strategic Development Committee Report.

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## EXECUTIVE SUMMARY

The application relates to a number of vacant buildings and plots that were, before the opening of the Royal London Hospital, used for hospital purposes. Permission is now being sought to bring these unused plots back into productive use. Redevelopment of these previously developed plots is appropriate given their location within the City Fringe Opportunity Area.

In terms of the development that is proposed, this is an employment-led proposal which would provide space for life science use. The Local Plan Whitechapel South Site Allocation supports life science development on these sites. In addition, one of the plots within the development is intended to be occupied by Queen Mary University of London for life science related research and teaching purposes. This use is also in accordance with the Site Allocation.

The proposed development would deliver a wide range of public benefits. These include the establishment of a new life science cluster for research and development, creation of employment and training opportunities and potentially up to 4,180 FTE jobs.

The development would also provide benefits to the community in the form of new community space including a Community Involvement Centre which would provide space to facilitate delivery of human health related initiatives and space for education activities on site, including a Community Lab. Education and outreach activities would also be secured by the proposals and obligations. These would complement the existing education offer in the borough and provide inspiring science related education opportunities.

In addition, a very good affordable workspace offer has been secured which would provide 10% of the life science floorspace (excluding the QMUL building) as affordable with deep levels of discount for future occupants and for a significant minimum 25 year period, beyond which the affordable workspace would be provided for a further 10 years of at a 10% discount.

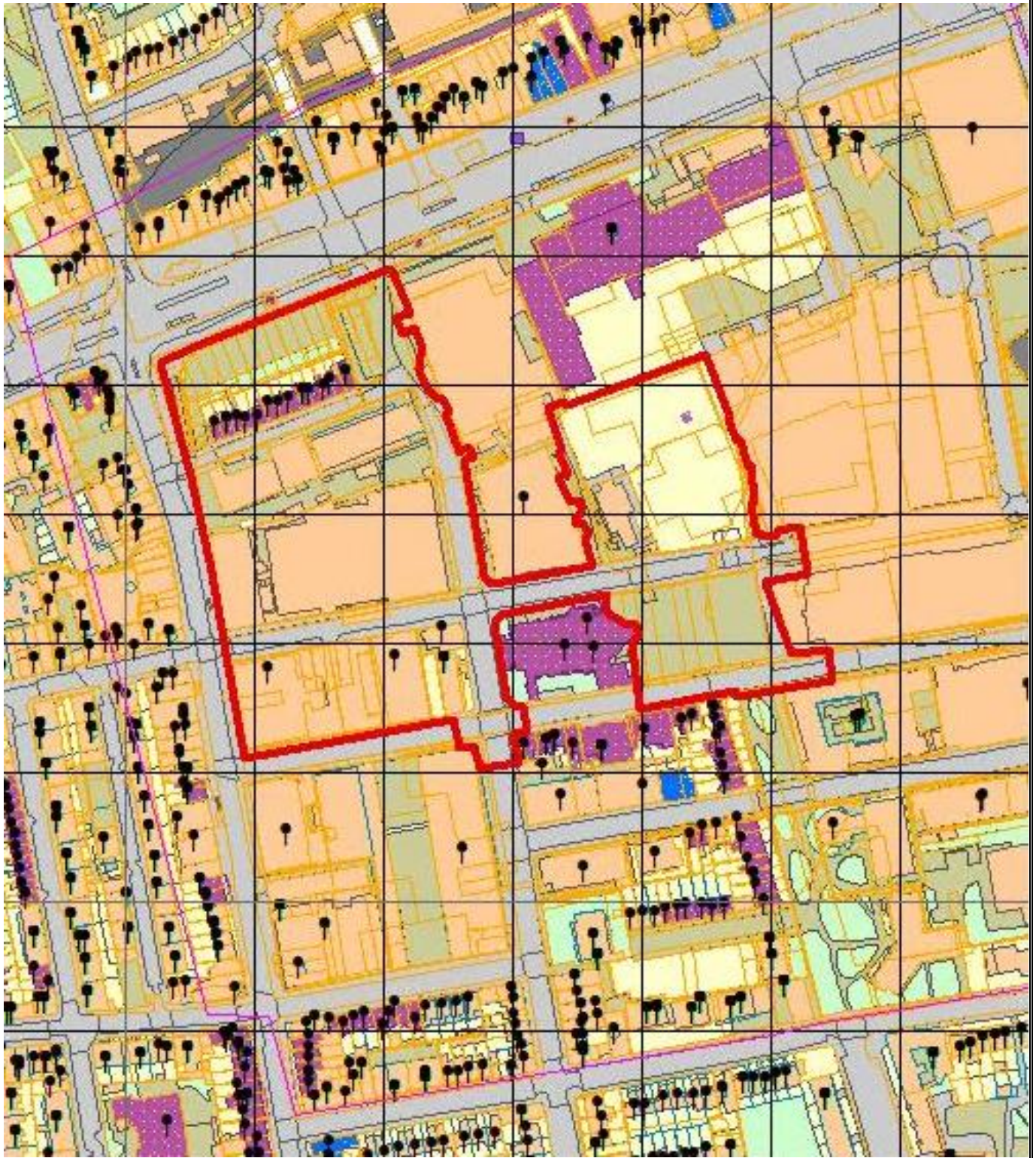
Significant areas of new and improved public realm are proposed throughout the site. This includes a proposed new public square adjacent to St. Augustine with St. Philip's Church as well as improvements to areas of public highway within the site and other areas of non-highway public realm within, including a proposed area of public realm in the line of the Green Spine that is envisaged within the Whitechapel South Site Allocation.

The proposal is partly located within the London Hospital Conservation Area (CA). The proposal involves significant demolition within the CA in the form of substantial demolition of the former Outpatients building which would cause harm to the CA. It would also cause harm to the setting of the Grade II Listed former Royal London Hospital (now the Town Hall) which is the centrepiece of the CA, as the largest of the proposed buildings would appear prominently within the setting of the former Royal London Hospital. Historic England have objected to the proposal on this basis, despite some improvements to scale, mass and overall design of the proposal having been secured through the course of the application. In addition a number of trees will be lost including TPO trees which is regrettable; however, Officers are satisfied that the applicant has made sufficient effort to retain trees on the site and the replacement planting proposed which is beyond London Plan requirements is acceptable.

Officers have also identified a number of other areas where the proposal causes harm or is otherwise deficient. These are in the areas of cycle access and provision for existing and future users as a result of the development, the non-consolidated servicing arrangements that are proposed, daylight, sunlight and overshadowing impacts, does not fully comply with tall buildings policy and concerns about the urban design quality of the Green Spine, concerns over active frontages and the general scale of the proposal within the townscape.

Notwithstanding both the heritage and other impacts of this proposal, Officers have concluded that the proposed package of benefits associated with this development carry sufficient weight

so as to outweigh the identified harm and deficiencies. These benefits are recommended to be secured through a legal agreement and conditions.



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	Planning Application Site Boundary
	Other Planning Applications
	Consultation Area
	Land Parcel Address Point
	Locally Listed Buildings
	Statutory Listed Buildings

## Planning Applications Site Map PA/21/02707

This site map displays the Planning Application Site Boundary and the extent of the area within which neighbouring occupiers / owners were consulted as part of the Planning Application Process



**TOWER HAMLETS**  
London Borough  
of Tower Hamlets

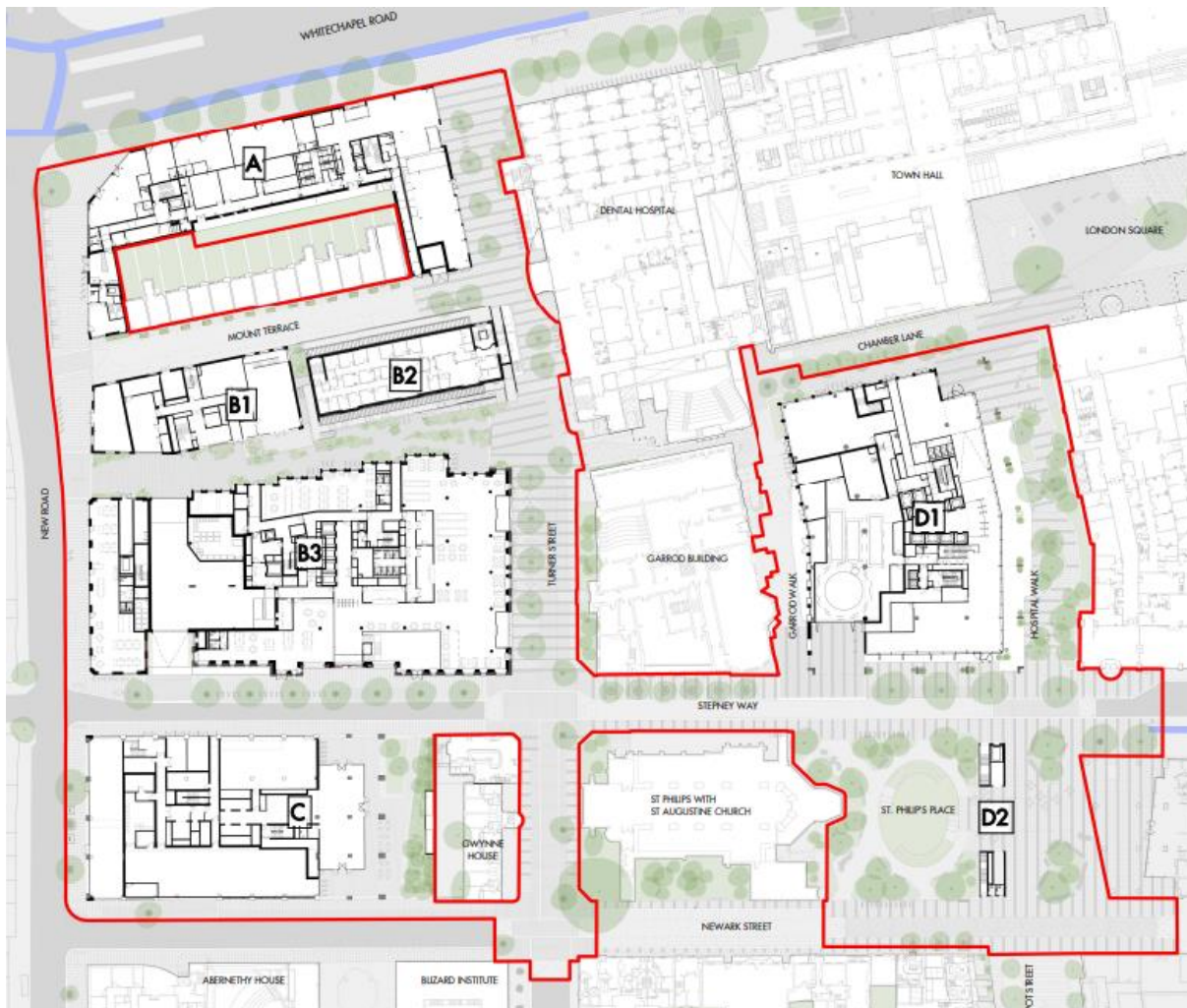
Scale : 50m grid squares

Date: 01 October 2024



## 1. SITE AND SURROUNDINGS

- 1.1 The application site is located to the west of the Royal London Hospital and covers an area of 2.55 hectares.
- 1.2 The site is located in the Whitechapel South Site Allocation, City Fringe Opportunity Area and the northern part of the site is in the Whitechapel District Centre. The entire site is also located in the Whitechapel Local Employment Location (LEL).
- 1.3 Most of the site is in the Former London Hospital Conservation Area and whilst there are no Listed Buildings within the red line plan, there are a number of listed buildings in close proximity including 22-34 Mount Terrace (Grade II), St Augustine with St Philip's Church (Grade II\*), the former Royal London Hospital (Grade II and now the new Tower Hamlets Town Hall), properties on Newark Street, Philpot Street and Whitechapel Road (Grade II) a K2 telephone kiosk on Whitechapel Road and the King Edward VII Jewish Memorial Drinking Fountain (Grade II). The site is also in proximity to several conservation areas including Whitechapel Market Conservation Area to the north of Whitechapel Road, the Myrdle Street Conservation Area located to the west and the Ford Square Conservation Area to the south east.
- 1.4 The site includes several TPO trees and Stepney Way to the south of the site is identified as Green Grid running on an east/west axis. The site is also located in the Green Grid Buffer zone.
- 1.5 The site is comprised of several plots. Some are vacant and some are occupied by buildings.
- 1.6 The plan below shows the site boundaries and the location of each of the plots within it.



1.7 The plots and their surroundings are described below:

**Plot A**

1.8 Bounded by Whitechapel Road to the north, Turner Street to the east and New Road to the south, Plot A is vacant. It has been hoarded off and was last in use as car parking during COVID for the hospital use. This plot is within the Former London Hospital Conservation Area (CA).

1.9 Adjoining the site to the south of Plot A is numbers 22-34 Mount Terrace. The three storey residential properties within this terrace are all Grade II listed. They also sit within the London Hospital CA.

**Plot B1**

1.10 Located to the south of Mount Terrace, east of New Road and north of the former Pasteur Street, Plot B1 is occupied by the former boiler house and chimney.

**Plot B2**

1.11 The Ambrose King Sexual Health Centre and Graham Hayton Unit (providing HIV services) occupies this plot. The building on this site dates from the mid 1920s and is three stories plus part basement. The building is within the London Hospital CA.

**Plot B3**

1.12 This plot is located to the south of the former Pasteur Street, east of New Road, west of Turner Street and north of Stepney Way. It is occupied by the former Royal London Hospital outpatients department and its annexe.

1.13 The former outpatients department is of red brick construction with stone and terracotta details. It has a basement and is three stories in height above ground, with a number of turrets projecting above the predominant scale. The former outpatients department is located entirely within the London Hospital CA.

1.14 The Outpatients Annexe is a 1930s building four stories in height. Its principal elevation fronts New Road. The Annexe is not within a conservation area.

**Plot C**

1.15 Bounded by Stepney Way to the north, Newark Street to the south, New Road to the east and Gwynne House (residential) to the east, this plot is occupied by the former Royal London Hospital dental institute and Barts and The London Students' Association.

1.16 The existing buildings within this plot are not located in a conservation area, but the Samaritan Public House and Gwynne House which adjoin the site to the east are located within the London Hospital CA. The Samaritan is a neo-Georgian 1930s building whilst Gwynne House is a 1930s modernist five storey block of flats.

**Plot D1**

1.17 This plot lies to the rear/south of Tower Hamlets Town Hall, to the east of QMUL's Garrod Building, to the west of the Royal London Hospital and to the north of Stepney Way. The plot is vacant and hoarded off, though there is pedestrian access between Stepney Way and London Square to the western edge of the Royal London Hospital Building. The site falls entirely within the London Hospital CA.

## **Plot D2**

- 1.18 Located to the south of Stepney Way and north of Newark Street this vacant plot lies between the Royal London Hospital building is to the east of this plot and the grade II\* St Augustine with St Philip's Church is to the west. The site falls entirely within the London Hospital CA.
- 1.19 On the opposite side of Newark Street is a run of grade II listed buildings (numbers 28 to 42 (even) Newark Street) which form a group with St Augustine with St Philip's Church. There are also grade II listed terraces at 43-69 Philpot Street to the south of plot D2.

## **2. PROPOSAL**

- 2.1 The table below sets out the quantum of each of the different uses that are proposed.

<b>Floorspace</b>	<b>Area</b>
Class E(g) space for flexible life science purpose uses	Up to 69,033 (GIA)
Flexible Class E supporting uses and Class F1 and Class F2 supporting uses (gallery/ exhibition/ community uses)	Up to 6,363 sqm (GIA)
F1(a) for research and development and teaching activities in the life science sector	Up to 2,820sqm (GIA)
Class E(b) café use with ancillary storage, and Sui Generis use (public toilets)	Up to 759 sqm (GIA)
Retained Ambrose King	2,002sqm (GIA)
<b>Total:</b>	<b>80,977sqm</b>

- 2.2 As described in section 1, the application is split into a number of plots. The overall size and scale of the buildings proposed on each of the plots is shown in the table below.

<b>Proposed buildings</b>		
<b>Plot reference</b>	<b>GIA (Sqm)</b>	<b>Height</b>
<b>A</b>	4,591	Ground + 2 storeys + plant
<b>B1</b>	2,954	Ground + 3 storeys
<b>B2</b>	No change to existing 2,002sqm GIA	No change proposed to existing height of Ground + 2 storeys + plant
<b>B3</b>	21,875	Ground + 6 storeys + plant
<b>C</b>	13,784	Ground + 5 storey + plant
<b>D1</b>	35,011	Ground + 12 storeys + plant
<b>D2</b>	759	Single storey pavilion
<b>Total</b>	<b>80,977</b>	

- 2.3 As set out in the description of development and shown in the table above, the use that will occupy most new floorspace across the development is that which will be used for life science purposes. Life science uses fall within Use Class E(g). Use Class E(g) are uses which can be carried out in a residential area without detriment to its amenity.

- 2.4 The life science led development that is proposed would be complemented by other uses through provision of space for uses falling within the following Use Classes:
- Use Class E (Commercial, Business and Service).
  - Use Class F1 (Learning and non-residential institutions).
  - Use Class F2 (Local community).
  - Use Class E(b) (Sale of food and drink for consumption (mostly) on the premises)
- 2.5 The flexible Class E space and Class F1 and Class F2 space would total 6,363sqm GIA. This would be distributed thus:
- Plot A – Class E units along the ground floor frontage to Whitechapel Road including turning the corner onto New Road and also within a small unit at the junction of New Road and Mount Terrace. Ground floor Class F1 space to the eastern end of Plot A adjacent to Turner Street.
  - Plot B1 – a single Class E unit at the western end of the proposed building fronting New Road.
  - Plot B3 – flexible spaces on each of the buildings ground floor frontages as well as space within basement.
  - Plot C - flexible Class E space within the basement as well as a unit along the New Road frontage and one fronting Stepney Way.
  - Plot D1 – flexible Class E space fronting Stepney Way and on the north east corner facing London Square and a community space to the north west corner.
  - Plot D2 – flexible Class E space in one part of the proposed pavilion building within the new public square.
- 2.6 In addition to the built development that is proposed, extensive public realm improvements are proposed on the site. This includes refurbishment of existing public realm and creation of new areas.
- 2.7 Where refurbishment is concerned this involves making the street level environment more pedestrian and cycle friendly and more visually attractive. This would be achieved by resurfacing in high quality materials, widening footways and tree planting as well as other soft landscaping features.
- 2.8 In terms of new areas of public realm these would comprise:
- A new public square between the Royal London Hospital building St. Augustine with St. Philip's Church, south of Stepney Way and north of Newark Street.
  - A new north-south route in the line intended for the Green Spine, located to the west of the Royal London Hospital building and connecting Stepney Way to London Square to the rear of the Town Hall;
  - A reinstated street between Turner Street and New Road. This route was formerly known as Pasteur Street, but has not facilitated public access for at least 15 years. The new route would be located to the rear/north of the new building on Plot B3 (the site of the former Outpatients department) and Plot B2 to the south of Mount Terrace.
  - An area between Gwynne House and the new building on Plot C.
- 2.9 The axonometric diagram below gives a high level overview of the relationship between the built development on each of the plots as well as the different scales of development proposed on each of the plots. This is looking in a north-westerly direction across the site in the direction of the junction of Whitechapel Road / New Road / Vallance Road.



### 3. RELEVANT PLANNING HISTORY

#### 3.1 Planning application ref: PA/04/00611:

*Redevelopment and refurbishment of the Royal London Hospital.*  
Full planning permission granted 03/2005

### 4. PUBLICITY AND ENGAGEMENT

#### **Pre-application community engagement**

4.1 The application as originally submitted was accompanied by a Statement of Community Involvement (SCI). This outlined the engagement undertaken by the applicant team before the application was submitted. In addition, a Statement of Community Involvement Addendum was submitted with the suite of documents submitted as part of the 'addendum submission'. This outlines the engagement activities of the applicant that have taken place after submission of the planning application.

- At pre-application stage the applicant carried out three stages of consultation. In summary:
- Over 300 people responded to questions in a survey, mostly local residents
- Over 76,000 people reached via social media adverts
- Over 16,000 newsletters sent out to local residents and businesses
- Over 2,500 visitors to our consultation website 6 webinars held for the public to meet with the team and ask questions
- 17 stakeholder meetings (both in person and online)

4.2 The SCI Addendum states that following submission of the application, the applicant continued with their engagement activities. This included:

- A competition for students from three local schools to create drawings which are now displayed on the hoardings of Plot A on Whitechapel Road. This included a visit to Queen Mary's Centre of the Cell for a class from each school, funded by the applicant.
- In-person engagement sessions around the area, speaking to local businesses to raise awareness of the project and engage with possible supporters.
- Hosting a stall and engaging with local residents at the Queen Mary Festival of Communities about the scheme, two years running, in June 2022 and June 2023.
- A 4-page newsletter sent to local residents, businesses and stakeholders, explaining the amendments that are being submitted as part of this application.
- Ongoing hosting of a consultation website with all project details.

4.3 In parallel with these activities, the applicant team engaged with political stakeholders at LB Tower Hamlets. This included:

- An in-person meeting with Mayor Lutfur Rahman and Cllr Kabir Ahmed.
- A site tour with Cllr Shafi Ahmed, Whitechapel ward councillor.
- A site tour with Cllr Abu Chowdhury, Cabinet Member for Jobs, Skills and Growth.
- A site tour with Cllr Maium Talukdar, Deputy Mayor.

## **Pre-application engagement with LBTH**

- 4.4 The applicant sought pre-application advice from LBTH Development Management Service between January 2021 and November 2021.

## **Statutory Consultation**

- 4.5 The application has been advertised twice – once early in 2022 after the application was first submitted and once in December 2023 following receipt of amended / updated drawings and documents including ES updates.
- 4.6 Letters were sent to 898 addresses surrounding the site notifying occupiers of the application. In addition, the application was publicised by display of site notices in the vicinity of the site and by publication of notices in the local newspaper.
- 4.7 In total, 35 letters of representation were received in support, 5 letters in objection (including one objection from NWTV Residents' Association (comprising residents living in New Road, Walden Street, Turner Street)) and 2 petitions in objection (one petition following each round of consultation). The two petitions contained a total of 63 individual signatures.
- 4.8 **Objections** to the proposal insofar as material planning considerations (including the objections cited in the petitions) are summarised below:

### Principle

- Regeneration of the area is generally supported but this should not be to the detriment of local residents and their right to a peaceful home environment.
- Parts of the proposal are welcome, however the proposal needs to be considered as a whole.

### Scale/mass

- The proposed building on Plot D1 is bulky and too tall monolith which will dwarf neighbouring buildings.
- The building is overbearing in both long and nearby views. It is asked that the scale is reduced.

### Amenity

- The proposal is overdevelopment, would be overbearing and would detrimentally affect privacy.
- BRE guidelines for sunlight and daylight would be breached. Buildings would suffer loss of sunlight.
- It is asserted that there are some errors in the BRE daylight assessment relating to Mount Terrace.
- The asserted benefit of better outside amenity is contrary to the reality of the proposal reducing light and sunlight e.g. for patients seeking a break from treatment to go outside.
- There are concerns that noise from and location of plant has not been properly considered and that there will be amenity impacts arising from plant noise.
- Significant adverse effects will arise from dust, noise and vibration during construction.
- The roof terrace of Plot C overlooks Gwynne House but does not appear to incorporate mitigation measures e.g. a screen and no restriction on hours

- Lighting and seating need to be properly considered given existing ASB issues on and around the site.
- West facing Gwynne House properties currently enjoy the amenity afforded by sky, sun and light over the roof of the Students' Union and the lower sections of the former dental hospital.
- Concern that the new open space to the rear of Gwynne House will attract unwanted activity and cause disturbance.
- The development on Plot A would dwarf Mount Terrace
- Most of the dwellings on Mount Terrace would not benefit from the stepped elevation present in the mid-section of the new building parallel to Whitechapel Road.

#### Construction impacts

- The construction access and crane for Plot C should be moved further from Gwynne House.
- Construction hours for Plot C should be shortened from the industry standard to only taking place between 9 and 5.
- Lighting of the construction site should be kept to a minimum to protect the amenity of Gwynne House residents.
- Request that temporary measures are installed in Gwynne House to limit noise and dust ingress during works.
- Request that the public areas around the site are cleaned on a regular basis during construction.
- Concern that security to the rear of Gwynne House will be compromised once the existing buildings on Plot C are demolished.
- There is concern about the routing of construction traffic within the small streets of the neighbourhood.

#### Heritage

- Block D1 will have detrimental impacts on the listed Town Hall and St. Phillips Church. Following reductions in height it remains of a scale that is out of character with the conservation area.
- Demolition of the Outpatients' annexe on New Road is thoroughly regrettable. The building has been allowed to rot.
- The scale of new development should be reduced to fit with the conservation areas, many streets of small houses (including listed Georgian houses) and Victorian buildings of modest scale.
- Objections raised by Historic England to the vertical extension of the Outpatients' building and loss of the 1930s annex are supported, as are their concerns that their concern that "the proposals largely strip the building of its architectural form and character" to the detriment of the conservation area.

#### Waste

- Insufficient consideration of waste matters.



- Waste storage and collection for Plot A and Mount Terrace residents will be affected.
- Moving bins from Plot A to B2 and B1 for collection is impractical and will potentially be noisy and obstructive particularly if carried out during office hours.

### Architecture

- Replacement buildings on New Road (Plots B3 and C) appear bland and corporate. It is questioned whether these facades can be further articulated with greater sensitivity to the locality and conservation area.

### Landscaping and public realm

- Landscape and public realm proposals are crucial to mitigate the lack of green space and poor air quality in the area.
- Further and more dense greening of the proposed spaces and the existing streets would be welcomed.
- It is asked that strict conditions are applied to ensure the delivery of the soft and hard landscape and lighting prior to occupation/in a timely manner, and which deal with the scenario that the plots may sold off individually. Maintenance of trees is also a concern
- The increase in activity, numbers of people and deliveries are likely to increase the pressure on public spaces.
- There is concern that TPO trees in the garden of Gwynne House will be affected by the development.
- Proposed planting will put the garden adjacent to the library in permanent shade and planting in the public realm will compete with existing planting in the library garden. The proposed trees will also affect sightlines and ability of other trees to survive/ grow.
- It is not understood why it is proposed to remove 4 Sargent cherry trees along the front of the Dental Hospital at the north end of Turner Street.
- York stone flags would be more appropriate for Mount Terrace, as a minimum for the footway to match remaining original flags.

### Highways, transport and access

- Steps should be taken to ensure that all those involved in the construction of the development and those who work in the completed life sciences buildings use public transport or bikes to get to work.
- Traffic issues – will result in heavier traffic, parking issues and associated pollution.
- The vision to create a more pedestrian and cycle friendly street network is not compatible with the access needs of the hospital.
- Vehicle access to Mount Terrace will be affected.
- The gap between Plots B1 and B2 should be closed to prevent ASB.
- Service vehicle and emergency vehicle routing

### Non-life science space

- In addition to new cafes on the campus, space should also be made available for small local shops

### **Representations supporting the proposal**

4.9 The material planning considerations contained within the letters of support are summarised below.

- The application has transformational potential for the Borough's communities.
- It represents a unique opportunity to revolutionise the health, wealth, and educational landscape of Tower Hamlets.
- Collaboration between academic research, healthcare expertise, and industry innovation holds immense promise for addressing the pressing health challenges faced by the community.
- The establishment of a Life Sciences Cluster in Whitechapel will not only contribute to the advancement of healthcare but also serve as a catalyst for economic growth and social progress in the local community.
- The proposed Life Sciences Cluster provides an opportunity to create much-needed employment opportunities for residents.
- The development offers innovation that will reduce lasting inequalities in the diverse and deprived Borough and support healthy life expectancy
- The development will support an expanded Clinical Research Facility offering early access to treatment for residents.
- The development will connect to children across the borough's sixth forms, aiming to lift performance.
- Greener and more open urban space will be provided.
- Working in partnership the unique opportunity to deliver better health for the community must be grasped.
- The proposals laid out will be an important asset, building on the existing foundations of life science activity and support a world-leading life sciences environment in Whitechapel.
- The proposals will create much-needed life sciences space, for which there is an identified high demand across London.
- The application that will transform the area into a vibrant and world-leading new life sciences cluster in Whitechapel.
- Barts Health, Queen Mary University of London and other local partners have worked with NHS PS to develop the plans for a new life sciences campus in Whitechapel. The aim is to create a new internationally significant hub where clinical, academic and commercial partners can collaborate to develop new products and services that will improve health and wellbeing in Tower Hamlets, the UK and globally.
- The proposals would provide a much safer, permeable and welcoming environment for workers and visitors to the area.
- The site will support the ambitions in the NHS long term plan to bring together the benefits of medical advances, driven by research and innovation, to patients and the UK economy.

- The role of industry is crucial in taking proven ideas and converting them into scalable solutions (often known as 'bench to bedside') as the NHS and academia cannot do this alone.
- Putting excessive restrictions on the floorspace will threaten the flexibility of the space created, curtailing innovation by making the opportunity much less attractive and the flexible design approach is encouraged.
- A unique opportunity exists in Whitechapel with the existing co-location of a major teaching hospital and world leading clinical research and education to harness the unique strengths of the NHS and the wider life science ecosystem to create a world leading hub for the next generation of medical discovery, innovation and delivery.
- The development of a life sciences campus will ensure that research will quickly lead to improvements in health outcomes both for the diverse communities of east London and people all over the world.
- The proposed campus will need sufficient space for a range of life sciences functions, including research and teaching alongside high quality space for commercial life sciences partners. There will need to be scope for innovative start-ups to rapidly expand, develop and grow their business.
- The development will greatly enhance the ability to bring more health research related investment into the area with the new Elizabeth Line connectivity providing additional opportunity to unleash further investment.
- The proposed cluster provides an opportunity to create much needed commercial facilities around the Royal London.
- Many life sciences business want to locate in London but there is a dearth of high quality commercial life sciences office and laboratory space for small, medium and large companies. The proposals create the much-needed cutting edge built environment to support business location at scale.
- The proposal is forecast to create over 5500 new high quality jobs and create an extra £7-12m per year for the local economy and £9m a year in business rates.
- The cluster can create aspiration and opportunity for children of all age to pursue a future healthcare career. It will build an environment and ethos which ensures local children are inspired and enabled to see sciences as an accessible career path with clearly defined and supported pathways.
- The proposed development transforms the area around the flagship new Town Hall, creating an appealing, safe public realm with more green spaces, public meeting areas and attractive new cycle pathways. Enhanced street lighting helps address community concerns over safety and anti-social behaviour.
- The University has long-standing established working relationships with the Royal London Hospital and Barts Health NHS Trust, with a successful track-record of delivering life-changing health outcomes, including in support of underrepresented communities in healthcare research and education. The vision for the site will build and utilise these existing relationships.
- Whitechapel is a fantastic and unique location as it can provide access to data from a diverse patient population.
- The new buildings will activate the streets around the hospital, creating a new sense of place in an area where so many of the buildings are inward facing, and providing new public realm that patients, visitors and staff can enjoy.

- Access to meaningful, affordable workspace is essential for start-ups and small businesses. London desperately needs more developments to assist the growth of small business
- The proposed development around Whitechapel Road, which brings together in one place clinicians, scientists, researchers, modellers, entrepreneurs and patients to collaborate and innovate, is quite remarkable. It will engineer a substantially increased speed of research and therapeutics development as well as offering the opportunity to improve and address local health outcomes and inequalities for a diverse population.
- The proposal will transform five unused and rundown sites.
- The proposal is particularly significant for Tower Hamlet's growing and youthful demographic, offering access to new employment, apprenticeships and educational opportunities.
- The proposal will increase spend in the local area.
- The proposals will help to build on the existing innovation and enterprise taking place in Whitechapel, which is already a hub for academic life sciences and clinical activity, including Queen Mary University of London and Barts Health NHS Trust working closely in partnership as Barts Life Sciences, as well as the innovation centre at QMB.
- This Life Sciences initiative will support university-NHS-industry partnerships to support the next generation of new treatments that will be tested first at the Royal London Hospital. By seeking to adopt these interventions early for the benefit of local people, and introducing community targeted treatment programmes, this development will put an important focus on a community often underserved by research and its benefits.
- Whitechapel has the critical institutional foundations to support a dynamic Life Sciences Innovation Cluster of scale. The area has for centuries been home to Barts Health NHS Trust, the 2nd largest NHS Trust in the UK, and the Russell Group's Queen Mary University of London, one of the most cited Universities for medical research globally.
- Support the focus in the life sciences cluster being very much on equity and the health problems that matter to the people of Tower Hamlets and across east London.
- The expanded Clinical Research Facility at the Royal London Hospital will be one of the key attractors for businesses to locate and grow in Whitechapel.

## 5. CONSULTATION RESPONSES

### External consultees

#### **Cadent Gas**

- 5.1 Requests an informative is attached to the decision notice, if approved, advising that Cadent Gas Ltd own and operate gas infrastructure in the area and that there may be a legal interest (easement and other rights) that restricts activity in proximity to Cadent Gas assets.

**Department for Levelling Up, Housing & Communities (now known as Ministry of Housing, Communities and Local Government)**

- 5.2 DLUHC acknowledge receipt of the environmental statement and have no comments to make on it.

#### **Environment Agency**

- 5.3 No objections. Recommends that the development secures Biodiversity Net Gain and that a precautionary approach is taken where contamination is concerned.

#### **Greater London Authority**

### *Land use principles*

- 5.4 The uses proposed are strongly supported as part of a world-class life sciences cluster; however, this is subject to ensuring that the space is secured appropriately for life sciences use, an element of affordable workspace is included, and resolution of concerns about the impact of the scale of the scheme on the public realm and historic environment. Reprovision of the sexual health clinic on the site must be explored and further details provided on relocation arrangements.

### *Historic environment*

- 5.5 Heritage benefits would be provided by the significantly improved public realm and the redevelopment of vacant plots/buildings; however, harm to the significance of heritage assets is identified from the proposed new buildings, in particular the scale/massing of Plot D1, which is contrary to London Plan Policies HC1 and D9. The applicant should consider means to reduce the level of harm. The less than substantial harm could potentially be outweighed by the public benefits proposed; however, these are not yet confirmed.

### *Urban design*

- 5.6 Many aspects of the layout and design are supported; however, the proposal is contrary to London Plan Policy D9(B) as it is not within an identified tall building zone, and there are significant concerns that the scale and massing of Plot D1 results in a number of areas of non-compliance with Policy D9(C). As currently proposed, Plot D1 would not fully deliver the 'Green Spine' public realm strategy, which requires improvement.

### *Transport*

- 5.7 Further information is required on electric vehicle charging, cycle parking, and relocation of a cycle hire docking station.

### *Climate change and environment*

- 5.8 Further information is required on energy, whole life carbon, circular economy, green infrastructure, water-related matters, and air quality.

### **Health and Safety Executive**

- 5.9 No comments as the site does not fall within any HSE consultation zones.

### **Historic England**

- 5.10 Raise objection to the proposals particularly in terms of the proposed vertical extension to the Outpatient's building, the proposed 16 storey building at Plot D1 and the regrettable loss of the 1930's Annexe to the Outpatients department. It is noted that changes have been made to the proposal but this does not overcome initial objections raised. Such changes include a c.12m reduction in the height of the D1 building and changes to the materiality and massing of the proposed extension to the former Outpatients' Building. The proposals consequently continue to cause harm to the character and appearance of the conservation area and buildings within it. The harm to the conservation area is identified as the middle range of less than substantial and harm to the significance of the former Royal London Hospital through changes to its setting at the lower half of the less than substantial range. The harm is contrary to the intent of the NPPF policies for the conservation of significance of heritage assets, to which great weight should be afforded. Any harm to the significance of a designated heritage asset requires clear and convincing justification and the harm should be outweighed by the public benefits of the proposal.

### **Historic England – Greater London Archaeological Advisory Service**

- 5.11 No objection subject to a condition being attached to the permission, if granted, to manage the archaeological impacts of the development.

**London City Airport**

- 5.12 No objection subject to a condition being attached to the decision notice, if approved, regarding crane and scaffolding details.

**London Fire & Emergency Planning Authority**

- 5.13 No comments received.

**Metropolitan Police – Crime Prevention**

- 5.14 No objections subject to a condition being attached to any permission requiring a Secured by Design strategy.

**NATS (National Air Traffic Services)**

- 5.15 No objection.

**Natural England**

- 5.16 No objection.

**Network Rail**

- 5.17 Request an informative is attached to the decision notice, if approved, advising the developer to contact Network Rail's Asset Management Team before commencing works on site in order to put arrangements in place to minimise risk to Network Rail's assets.

**Royal Borough of Greenwich**

- 5.18 No objections.

**Thames Water**

*Waste water comments*

- 5.19 If granted, request that a planning condition is attached to the decision notice requiring no occupation of any part of the development until:
- It has been demonstrated that foul water capacity exists off site to serve the development; or
  - A development and infrastructure phasing plan has been agreed with the LPA. Where such plan is provided no occupation shall take place until any required foul water upgrades have been completed.

*Surface water comments*

- 5.20 If granted, request that a planning condition is attached to the decision notice requiring no occupation of any part of the development until:
- It has been demonstrated that surface water capacity exists off site to serve the development; or
  - A development and infrastructure phasing plan has been agreed with the LPA. Where such plan is provided no occupation shall take place until any required surface water upgrades have been completed.

*Water comments*

- 5.21 Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. If granted, request that a planning condition is attached to the decision notice requiring no occupation of any part of the development until:
- It has been demonstrated that all water network upgrades required to accommodate the additional demand to serve the development have been completed; or
  - A development and infrastructure phasing plan has been agreed with the LPA. Where such plan is provided no occupation shall take place until any required surface water upgrades have been completed.

#### *Piling*

- 5.22 The site is within 15m of a strategic sewer. Should permission be granted, then a piling method statement needs to be provided to detail measures that will be taken to prevent and minimise the potential for damage to subsurface sewerage infrastructure.

#### *Other comments*

- Measures should be incorporated within the development to minimise groundwater discharges to the public sewer. Thames Water request that an informative is attached to the decision notice, if granted, advising that a Groundwater Risk Management Permit is required from Thames Water.
- As required by Building Regulations Part H, the applicant should incorporate within their proposal protection to the property to prevent sewage flooding to deal with potential sewerage network surcharge to ground level during storm conditions.

#### **The Victorian Society**

- 5.23 Objects to the proposed alterations to the former Outpatients Department. The proposed façade retention would retain something of the building's exterior significance, but the legibility of the building would be lost. Any acceptable proposal will show greater sensitivity to the building's historic and architectural significance, as well as preserving its legibility as 3-dimensional building, rather than just a façade.
- 5.24 In principle the Society accepts the proposals for new buildings on the site. However, they are concerned both with the scale of what is proposed, the design detail and how this reacts within and beyond the site. The relationship of buildings B1 and B2 to the listed Mount Terrace is concerning and the horizontal emphasis of Plot C is at odds with the verticality of buildings opposite. Red brick could be overbearing.

#### **Transport for London**

##### *Access and parking*

- 5.25 Removal of the existing hospital car park on Plot A is welcomed. On-street parking within the site boundaries would be reorganised. Ten disabled user parking bays would be provided without affecting the total number of spaces. Provision of electric vehicle charging facilities should be explored.
- 5.26 Cycle parking would be provided in accordance with London Plan standards, which is welcomed. If granted, conditions should be attached to the decision notice requiring detailed design of the cycle parking and arrangements for its ongoing upkeep/maintenance.
- 5.27 The proposal would necessitate the relocation of the existing Cycle Hire Docking Station (CHDS) on New Road, currently towards the back edge of the footway to enable the redevelopment of Plot A. The docking station is already the sixth busiest in London. The development would increase demand on the cycle hire at this location, therefore TfL require service capacity / number of station increases. It also needs to be fully demonstrated that alternative location(s) for relocated/new docking stations are deliverable. Given that the CHDS requirements have not been resolved at application stage, TfL recommends that in

relation to this matter pre-commencement restrictions are put in place on any planning permission if approved.

#### 5.28 *Trip generation*

- 5.29 It is anticipated that the local public transport network would be able to accommodate the additional demand associated with completed development. Given the proposal would be mostly car free, there would be no significant impacts on the Transport for London Road Network (TLRN) / local highway network.

#### *Healthy Streets*

- 5.30 The application has been accompanied by an Active Travel Zone (ATZ) assessment. Following review of this, TfL have confirmed that they are not seeking a contribution towards ATZ upgrade on the TLRN from the proposal; as Whitechapel Road (TLRN) is receiving upgrade works, benefiting from the government's Levelling Up funding.

#### *Construction*

- 5.31 If permission is granted a Construction Logistics Plan (CLP) should be secured by planning condition. Measures will also be required to protect highway trees.

#### *Travel Plan*

- 5.32 If permission is granted, a full Travel Plan should be secured via a legal agreement under S.106 of the Town and Country Planning Act.

#### *London Mayoral CIL*

- 5.33 An appropriate Mayor of London CIL contribution should be secured from the proposed development towards Crossrail.

### **Transport for London – Infrastructure Protection**

- 5.34 No objection in principle, though if permission is granted it is requested that a condition is attached to the decision notice requiring detailed design and method statements to be submitted and approved demonstrating that the proposed development will not affect London Underground infrastructure. It is also requested that an informative is added asking the developer to contact London Underground Infrastructure Protection in advance of submitting the details required by condition so that their input and advice can be incorporated into the submission.

### **Twentieth Century Society**

- 5.35 Objects to the proposal due to the total loss of the Outpatients Annexe which it regards as a Non-Designated Heritage Asset and also contributes positively to the setting of the nearby Former London Hospital Conservation Area. The building is a distinctive interwar building which is a key part of the history of the London Hospital and its development in the early 20th century. The Society are of the view that the Annexe could be adapted and repurposed and its loss is not convincingly justified within the submission. The Society also notes the Annexe's former use as medical type building.

### **Internal consultees**

#### **LBTH Arboricultural Officer**

- 5.36 The British Standard categorisations that have been given to each tree are acceptable.
- 5.37 Regarding tree loss, there are no objections to the removal of T17, T22 – T26, T38 – T39, T42 and T44 – T46 and believe their loss can be adequately mitigated through the new planting



proposed. There is also no objection to the transplantation of T18 – T21. However, the proposed removal of T37, T40 and T41 is not supported as it is not considered that the loss of these trees can be adequately mitigated.

- 5.38 Proposed tree protection measures and facilitation pruning outlined in the method statement are acceptable and will ensure construction will have a negligible impact on retained trees in accordance with the requirements of policy D.DH6 of the Tower Hamlets Local Plan 2031 (2020) and Section 197 of the Town and Country Planning Act 1990 (as amended). These measures should be retained in place for the duration of the construction works.
- 5.39 Regarding planting, there is a good mix of native and non-native species proposed, meeting an important Local Biodiversity Action Plan (LBAP) target and safeguarding against current and future pests and diseases. Due consideration has also been given to planting locations and the overall size and shape of the species chosen, ensuring post development pressures are mitigated and the trees can grow to their full proportions without regular or heavy pruning.
- 5.40 The proposed stock sizes are acceptable and will provide an instant amenity impact and ensure canopy cover loss is appropriately mitigated from an early stage. However, submission of a tree planting methodology in line with BS 8545 is also required and should describe a process for planting and maintaining young trees that will result in them successfully establishing in the landscape. This should include current and proposed utility and service runs, any proposed changes to the highway layout and a methodology for the successful transplantation of T18 – T21 and a 3-year replacement plan, which will see all trees which fail to establish replaced like for like.

### **LBTH Energy**

- 5.41 Requirements are met as the applicant has followed the energy hierarchy and is proposing to offset residual emissions. If granted, conditions should be attached to the decision in relation to cooling requirements, safeguarding connection to future district heat network and full bio solar integration across the site. It would also be prudent to plan for excess heat from the proposed scheme. A waste heat utilisation strategy should therefore also form part of any permission. This will ensure that opportunities in relation to future Heat Zones are maximised.

### **LBTH Environmental Health**

- 5.42 No objection to the proposed development on grounds of noise and vibration subject to conditions relating to noise from plant and restrictions on demolition and construction activities being attached to the decision if permission is granted.
- 5.43 No objection to the proposed development on the grounds of smell and pollution subject to conditions relating to the following being attached to the decision if permission is granted:

- Dust Management Plan and PM10 Monitoring Condition
- Kitchen Extract Standards for Commercial Uses
- Construction Plant and Machinery (NRMM)
- Emergency Generators' flues

### **LBTH Highways**

- 5.44 Highways team note that the level of engagement has been good and overall the permeability through the site is to be improved and is welcomed. They are also supportive of the loss of hospital car parking bays and general reduction in traffic movement as a result. However, it is noted that LBTH advice has not been followed in respect of setting back plots B3 and C to provide a greater width of footway along New Road. The footway on that stretch is narrow, particularly around the bus stop. LBTH Highways are of the view that the footways at this location are not suitable for the existing footfall, let alone the increase in foot, wheeling and cycling which would be expected as a result of this development. As a result of the applicant

not addressing this and not providing adequate room for pedestrians, wheelers and cyclists  
Highways consider the proposal to be overdevelopment.

5.45 Notwithstanding the above, if permission is granted then the following should be provided or secured by way of condition or planning obligation:

- Legal agreement to ensure that employees / occupants cannot apply for a permit to park on the surrounding public highway.
- Further details of the cycling strategy to be supplied.
- Relocation of TfL cycle hire docking station on New Road to not impede the sight line of vehicles exiting Mount Terrace
- A full Delivery and Service Management Plan to be required by condition. Consolidation proposals to be worked up further and expanded.
- The agreement under S.278 of the Highway Act will need to ensure that highways design prioritises the needs of pedestrians and those who are visually impaired.
- Where basements are adjacent to the public highway they will need full technical approval from the Highways Structures Team
- LBTH Code of Construction Practice needs to be complied with.
- A comprehensive scheme of changes to the public highway is proposed and will be subject to an agreement under S.278 of the Highway Act.
- Full and updated versions of the current draft Demolition and Construction Management Plan and Travel Plan should be required via planning condition.

### **LBTH Biodiversity**

5.46 Little existing biodiversity on the sites. Extensive bat surveys undertaken and no bat roosts found. Significant biodiversity net gain through green roofs and ornamental planting. Urban Greening Factor is sensible but is noted to be below the London Plan target for commercial development. A good range of nectar rich plants are proposed as well as a number of native tree species. Some species will need to be non-invasive forms and this can be secured by condition. Full details of the biodiversity mitigation and enhancement will be required at each phase and should be secured by condition.

### **LBTH Waste**

5.47 Private waste collections are proposed which is acceptable as this is the proposal is for a commercial development. If permission is granted then a condition is recommended to require, where possible, consolidated waste collection arrangements. This would enable the same waste vehicle to collect waste from all plots as part of the same collection of that waste stream. This would minimise the number of waste vehicle trips across the development.

## **6. RELEVANT PLANNING POLICIES AND DOCUMENTS**

6.1 Legislation requires that decisions on planning applications must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise.

6.2 In this case the Development Plan comprises:

- The London Plan 2021
- Tower Hamlets Local Plan 2031

6.3 The key development plan policies relevant to the proposal are:

### **London Plan (2021)**

*Chapter 1 Planning London's Future - Good Growth*

GG1 Building strong and inclusive communities

- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG5 Growing a good economy

### *Chapter 2 Spatial Development Patterns*

- SD1 Opportunity Areas
- SD6 Town centres and high streets

### *Chapter 3 Design*

- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D8 Public realm
- D9 Tall buildings
- D10 Basement Development
- D12 Fire safety
- D14 Noise

### *Chapter 5 Social Infrastructure*

- S1 Developing London's social infrastructure
- S4 Play and informal recreation
- S6 Public toilets

### *Chapter 6 Economy*

- E1 Offices
- E2 Providing suitable business space
- E3 Affordable workspace
- E8 Sector growth opportunities and clusters
- E9 Retail, markets and hot food takeaways
- E10 Visitor Infrastructure
- E11 Skills and opportunities for all

### *Chapter 7 Heritage and Culture*

- HC1 Heritage conservation and growth

### *Chapter 8 Green Infrastructure and Natural Environment*

- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands

### *Chapter 9 Sustainable Infrastructure*

- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital connectivity infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management

SI13 Sustainable drainage

### *Chapter 10 Transport*

- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.2 Office parking
- T6.2 Retail parking
- T6.5 Non-residential disabled persons parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning

## **Tower Hamlets Local Plan 2031**

### *Achieving sustainable growth*

- S.SG1 - Areas of growth and opportunity within Tower Hamlets
- S.SG2 - Delivering sustainable growth in Tower Hamlets
- D.SG3 - Health impact assessments
- D.SG4 - Planning and construction of new development
- D.SG5 - Developer contributions

### *Creating attractive and distinctive places*

- S.DH1 - Delivering high quality design
- D.DH2 - Attractive streets, spaces and public realm
- S.DH3 - Heritage and the historic environment
- D.DH4 - Shaping and managing views
- S.DH5 - World heritage sites
- D.DH6 - Tall buildings
- D.DH7 - Density
- D.DH8 - Amenity

### *Delivering economic growth*

- S.EMP1 - Creating investment and jobs
- D.EMP2 - New employment space
- D.EMP4 - Redevelopment within the designated employment locations

### *Revitalising our town centres*

- D.TC1 - Supporting the network and hierarchy of centres
- D.TC2 - Protecting retail in our town centres
- D.TC3 – Retail outside our town centres
- D.TC4 - Financial and professional services
- D.TC5 - Food, drink, entertainment and the night-time economy

### *Supporting community facilities*

- S.CF1 - Supporting community facilities
- D.CF3 - New and enhanced community facilities

### *Enhancing open spaces and water spaces*

- S.OWS1 - Creating a network of open spaces
- D.OWS3 - Open space and green grid networks

### *Protecting and managing our environment*

- S.ES1 - Protecting and enhancing our environment
- D.ES2 - Air quality
- D.ES3 - Urban greening and biodiversity
- D.ES4 - Flood risk
- D.ES5 - Sustainable drainage
- D.ES6 - Sustainable water and wastewater management
- D.ES7 - A zero carbon borough
- D.ES8 - Contaminated land and storage of hazardous substances
- D.ES9 - Noise and vibration
- D.ES10 - Overheating

### *Managing our waste*

- S.MW1 - Managing our waste
- D.MW3 - Waste collection facilities in new development

### *Improving connectivity and travel choice*

- S.TR1 - Sustainable travel
- D.TR2 - Impacts on the transport network
- D.TR3 - Parking and permit-free
- D.TR4 - Sustainable delivery and servicing

### *Section 4 Delivering sustainable places*

#### Sub-area 1: City Fringe

#### 1.4 Whitechapel South Site Allocation

## **6.4 LBTH's Supplementary Planning Guidance/ Other Documents**

- National Planning Policy Framework (2023)
- National Planning Practice Guidance
- GLA City Fringe Opportunity Area Planning Framework (2015)
- GLA SPG London's World Heritage Sites – Guidance on Settings
- LBTH Employment Land Review (2016)
- LBTH Planning Obligations SPD (2016)
- Historic England Advice Note 4 – Tall Buildings
- Historic England Good Practice Advice in Planning: 3 (2<sup>nd</sup> Edition) The Setting of Heritage Assets
- Former London Hospital Conservation Area character appraisal and management plan (Adopted October 2021)
- Whitechapel Market Conservation Area character appraisal and management plan (Adopted October 2021)
- Myrdle Street Conservation Area character appraisal and management plan (Adopted October 2021)

## **7. PLANNING ASSESSMENT**

### 7.1 The key issues raised by the proposed development are:

- i. Environmental Impact Assessment
- ii. Land use
- iii. Design
- iv. Heritage
- v. Amenity
- vi. Landscape and biodiversity

- vii. Highways, transport and servicing
- viii. Environment
- ix. Infrastructure
- x. Local Finance Considerations
- xi. Equalities and Human Rights

## **Environmental Impact Assessment (EIA)**

- 7.2 The proposed development constitutes Environmental Impact Assessment (EIA) development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and is accompanied by an Environmental Statement (ES). The ES has been prepared by Trium Environmental Consulting LLP ('Trium').
- 7.3 The Council issued an EIA Scoping Opinion (ref: PA/21/01832) on 01/10/2021. The submitted Environmental Statement (ES) accords with this Opinion and assesses the environmental impacts of the development under the following topics:
- socio-economics
  - traffic and transport
  - air quality
  - noise and vibration
  - archaeology
  - built heritage
  - daylight sunlight
  - overshadowing
  - wind microclimate
  - greenhouse gases
  - ground conditions
  - townscape and visual impact assessment
- 7.4 The Council appointed Temple Group Consulting as competent expert to independently examine the ES, to prepare an Interim Review Report (IRR) and to confirm whether the ES satisfies the Regulations. The Council's EIA Officer and the Council's Appointed EIA Consultants have confirmed that the submitted ES (including the subsequent ES submissions as set out above) meets the requirements of the EIA Regulations.
- 7.5 The ES has informed the planning assessment and relevant issues are discussed in the body of this report and adverse environmental effects have been identified. If planning permission is granted then, in accordance with the recommendations of the competent expert, mitigation measures would be secured by planning conditions and /or obligations.

## **Land Use**

### London Plan

- 7.6 The site is located within the City Fringe Opportunity Area. The London Plan establishes Opportunity Areas as those locations which are identified as significant locations with development capacity to accommodate new housing, commercial development and infrastructure, linked to potential improvements in public transport connectivity and capacity.
- 7.7 The City Fringe Opportunity Area Planning Framework (OAPF) separates areas within the OAPF boundary into core growth areas and wider hinterland. The application site falls entirely within the core growth area of the OAPF. In addition, the 'Old Royal London Hospital' is identified as a key site within the core growth area.
- 7.8 The OAPF provides commentary within the section on Whitechapel regarding life sciences campuses or clusters, noting the alignment with Crossrail of Imperial West at one end and Whitechapel at the other. These clusters contain a mix of world-class academic centres,

including Queen Mary, large NHS facilities with unparalleled access to data as well as public and private sector research facilities.

- 7.9 The OAPF goes on to state that whilst other locations such as Kings Cross have the potential to make a major contribution to strengthening the London life-sciences sector, the key opportunity within the City Fringe is at Whitechapel. It is stated that Whitechapel not only has significant potential to accommodate start-ups and businesses spilling out from Tech City, but it is already home to the Royal London hospital, Queen Mary University, the Blizzard Institute, Queen Mary Bio-innovation Centre and a number of smaller university and hospital uses. The remaining development sites of the old Royal London Hospital estate are close to these existing facilities and in close proximity to the Crossrail station.

#### Local Plan

- 7.10 Within the Local Plan, the site sits within the Whitechapel South site allocation. Acceptable land use requirements set out in the allocation include development which is employment-led (within the Local Employment Location, which this site is) providing suitable units for the needs of life science, medical, research and educational uses associated with the Med City. In terms of infrastructure requirements, a minimum of 1 hectare of strategic open space is required as well as re-provision of a sexual health facility (including HIV services).
- 7.11 Given the previous use of the buildings which would be affected by this proposal as well as the ongoing provision of sexual health clinic/HIV services in a building on the site, Local Plan Policy D.CF2 is of relevance. This requires that existing community facilities are retained unless it can be demonstrated that (a) there is no longer a need for the facility or an alternative community use within the local community, or (b) a replacement facility of similar nature that would better meet the needs of existing users is provided.
- 7.12 In terms of new employment floorspace, of principal relevance is Local Plan policy D.EMP2 which states that new or intensified employment floorspace will be supported within designated employment locations, the Tower Hamlets Activity Areas and identified site allocations.
- 7.13 Where provision of town centre uses is concerned, policy S.TC1 sets out the types of uses most appropriate to the range of centres within the borough. It expects district centres to act as vibrant hubs containing a wide range of shops, services and employment. It also expects new development within town centres to support the delivery of new retail and leisure floorspace to meet identified needs and to contribute positively to their function, vitality and viability. The supporting text demonstrates that Whitechapel has the highest capacity for new convenience and comparison retail floorspace of all town centres in the borough, with capacity for 2,262sqm and 3,105sqm of additional floorspace respectively. In addition, policy D.TC2 provides policy guidance for the development of retail within town centres. D.TC3 and D.TC5 sets out in which circumstances new retail, food and drink will be acceptable outside of town centres.

#### Vacant hospital buildings

- 7.14 While the majority of the site is vacant, the proposal still constitutes a substantial loss of community uses. Since 2012 the services that were carried out in the vacant hospital buildings have been provided in the new Royal London Hospital and therefore these buildings have been vacant for some time. The Hospital have been consulted on this application and in response to that consultation have not raised any issues in terms of the impact of the loss of vacant hospital buildings on their needs. It should also be noted that the applicant is the Department of Health and Social Care and NHS Property Services who will be acutely aware of existing needs. It is therefore reasonable to conclude that those facilities have been satisfactorily replaced with facilities of a similar nature or function. It is also reasonable to conclude that given the purpose built nature of the replacement facilities that they better meet the needs of users who accessed the services previously carried out in the now vacant buildings. The requirements of Local Plan policy D.CF2 are therefore complied with in respect of this aspect of the proposal.

### Unbuilt hospital accommodation

- 7.15 It should also be noted that the permission for the new Royal London Hospital building granted under application ref: PA/04/00611 included new hospital accommodation on the site referred to in the current application as Plot D1. This would have been the new outpatients department housed within a five storey building, the height of which would have sat just below the main ridge line of the adjacent Garrod Building.
- 7.16 Clearly if permission were granted for the proposed life sciences development and the life science building on Plot D1 were constructed, then the building anticipated in permission ref: PA/04/00611 would not be able to be built. Similar to the aforementioned loss of the vacant community uses (in the form of the empty hospital buildings) the outpatients facilities have been incorporated within the Royal London Hospital building as it now exists. Given the time that has elapsed since the new hospital building was first brought into use it is reasonable to conclude that the outpatients facilities are being provided in a manner acceptable to the NHS and in a way which better meets the needs of its users i.e. the patients when compared to when services were provided in the now vacant outpatients building and its annexe (Plot B3 in the current application). As with the above discussion on the loss of the vacant hospital buildings, Officers are able to confirm that the Hospital were consulted on the current planning application and have in response to that consultation have not raised any issues in terms of the impact of the proposed development on Plot D1 affecting their current or future needs. There is therefore no conflict with Local Plan policy D.CF2 in terms of the unbuilt hospital accommodation.

### Sexual health and HIV services

- 7.17 Included within the site boundary is the Ambrose King Sexual Health Centre and the Grahame Hayton Unit which provides specialist HIV services. The building within which these uses are located is referred to in the application as *Plot B2*.
- 7.18 The application as originally submitted proposed changing the use of the building and extending it with the new use to be contained within it to be for life science purposes.
- 7.19 As noted earlier in this report, an infrastructure requirement in the Local Plan Whitechapel South site allocation is that sexual health facilities on the site are re-provided if they are to be displaced from their current location.
- 7.20 No alternative provision was formally proposed as part of the application and potential options to relocate the facility to the Mile End hospital or within the existing Royal London Hospital were confirmed as unacceptable in principle to the Council's Public Health team. Consequently, it has been negotiated for both the sexual health and HIV services to remain in place as existing.
- 7.21 Officers note that '*Securing the longer-term future of the Sexual Health Clinic on Plot B2, allowing for its continued use by local residents*' is put forward by the applicant as a 'health and social value benefit' of the proposal. However, at the time of writing this report no provisions had been agreed with the applicant in relation to this use being retained. Officers therefore recommend that minimal weight is attached to this as a material consideration.

### Proposed life science uses – Plots A, B1, B3, C and D1

- 7.22 The site is located entirely within the Whitechapel Local Employment Location. It also occupies a sizable portion of the Whitechapel South site allocation. The location of the site within both of these designations mean that the site is an appropriate location for employment uses in accordance with Local Plan policy D.EMP2. In addition, the provision of life science floorspace is in accordance with the land use requirements set out in the Whitechapel South site allocation.
- 7.23 Whilst the land use principle of life science floorspace is acceptable, it is important to consider how this is secured. As can be seen from the description of development the proposed life science use falls under Use Class E(g). Use Class E(g) is a subsection of wider Use Class E



which relates to 'Commercial, Business and Service' uses. Class E(g) allows for the following to be carried out:

(g) for—

(i) an office to carry out any operational or administrative functions,

(ii) the research and development of products or processes, or

(iii) any industrial process,

*being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.*

7.24 The activities that can be undertaken under Use Class E(g) are broad and not sufficiently aligned with the more specific and specialist nature of activities that would take place within a life science development. It will therefore be necessary to place restrictions on the permission, if granted, to restrict the permitted use to a life science use (as per the description of development) as opposed to a broader Class E use.

7.25 It is apparent from the application that the intention is to create a life science cluster with the intention of improving human health. Indeed, the Planning Statement discusses the proposal being able to 'affect real change for local residents and wider LBTH residents' and being able to create the opportunity for 'meaningful health improvements'. It is clear from letters of support on the application, including by those working in the NHS, that the authors have understood the application to be proposing a life science development which will benefit human health, such benefit incorporating a significant local dimension.

7.26 Life science activities cover a very broad spectrum and includes areas beyond those concerned with human health. Given the overt expression of asserted benefits to human health that will flow from the development, it is essential that the scope of life science activities within the proposed buildings is appropriately controlled to ensure the human health benefits are realised.

7.27 A key objective of the Local Plan is 'Sharing the benefits of growth'. This includes the principle that growth must bring an improved quality of life, health benefits and reduce health inequalities. Without such limitation on the development, the proposal would potentially not deliver the asserted human health benefits (as life science uses beyond those dealing with matters of human health could be carried out) and would therefore fail to make proper provision for meeting the needs of the residents of Tower Hamlets, contrary to a key Local Plan objective.

7.28 Officers therefore recommend that the following definition is included within a planning condition if permission is granted:

*"life science use for the purpose of this consent means the study of the structure and behaviour of living organisms; with the primary purpose of directly aiding human health."*

7.29 As stated above, life science uses are broad and it is to be noted that this could include the areas of biology, botany, zoology, microbiology, physiology, biochemistry, medical, clinical, biomechanics, med-tech, bio-tech. The specific areas are not known, and indeed do not need to be known at this stage and may well evolve in the future. The overriding consideration is that those specific activities are carried out with the primary purpose of directly aiding human health and this would be secured under the above definition.

7.30 It is recommended that an informative is included on the decision notice, if granted, stating the aforementioned uses would fall to be considered as acceptable under the above definition. Including such a definition within a legal agreement and requiring activities within the Use

Class E(g) floorspace to be carried out within this definition will ensure that the aforementioned objectives are satisfied, the land use requirements of the Local Plan are met and the benefits to human health realised. Officers consider including the above definition within the permission is of utmost importance and without this, or with a definition that is broader in scope, the proposal as a whole would be unacceptable.

#### Proposed life science uses – Plot C

- 7.31 During the course of the application Queen Mary University of London (QMUL) have expressed an interest in acquiring Plot C. It is understood that the building would predominantly facilitate university research activities and this would take up the majority of the floorspace in Plot C. Alongside this, one floor would be used exclusively for university teaching.
- 7.32 QMUL's interest in occupying Plot C is welcome not only in the context of the remainder of the development being speculative in nature but also in the context of their high performing and respected status and the good work that they already undertaken in the borough. QMUL has established links with providers such as Barts NHS Trust and in collaboration with them carries out valuable research to the benefit of delivering health outcomes.
- 7.33 Whilst it is not a material planning consideration, having QMUL on site is seen as positive as it will allow for an expansion of their valuable work. Their anchor presence within the development will also increase the attractiveness of the remainder of the development to prospective occupiers which is in accordance with the land use principles set out in the site allocation.

#### Life science use – health outcomes

- 7.34 Whilst as set out above the principle of life science as a land use is acceptable on this site, it is also important to consider how the existence of such a use can be of maximum benefit to the Borough, including dealing with how the human health benefits that permeate the application submission are realised.

- 7.35 In respect of this, Officers recommend that if permission is granted then the following is required:

#### *Health Outcomes Strategy*

- 7.36 A Health Outcomes Strategy is required as part of the permission (to be secured within a legal agreement). This would bring various operators together to target maximising local human health improvement outcomes from the operation of the development bringing lab to bedside type initiatives to benefit local residents, Barts Trust NHS patients and those registered with through engaging with LBTH primary care providers.

#### *Health Strategy Framework*

- 7.37 Alongside the Strategy a Health Strategy Framework would be required. This would detail how local health outcomes will be secured, measured and monitored to ensure stated benefits are realised. The Framework would need to include consideration of how the development will support the maintenance and promotion of good health and the reduction of health inequalities as well as the treatment of ill-health. Annual review of the Framework would be required by the Working Committee (described below) and an obligation to report to the Council as to whether the objectives of the approved framework are being met would be required.

#### *Health Outcomes Working Committee*

- 7.38 A Health Outcomes Working Committee would be required to be formed through the legal agreement. This would scope, monitor and review and update the scope of the health benefits

arising from the development. The Committee would need to be established throughout the lifetime of the development. It is anticipated that membership of the Committee would comprise as a minimum:

- i. A representative of the Developer
- ii. A representative of the Council, to include no less than a representative from LBTH public health team.
- iii. A representative with relevant expertise and appointed in consultation and agreement with LBTH Public Health Team [or could broaden it out from Tower Hamlets Health Determinants Research Group.
- iv. A representative from QMUL;
- v. A representative from Barts;

#### Proposed uses - Community spaces

- 7.39 The proposed buildings show community spaces to be located in Plot A and Plot D1. Other than potential use of the space in Plot A as a life science gallery, the applicant has not proactively included as part of their application any detail as to what the proposed community spaces may be used for.
- 7.40 Clearly provision of community space is a potential benefit of the scheme given the scale and nature of the proposals under consideration. This is not only important in terms of embedding the proposal in the borough and making it less anonymous and more relevant and beneficial to the borough's residents but is also a factor which can be weighed in the balance by the decision maker against some aspects of the scheme which Officers have assessed as remaining deficient.
- 7.41 Officers have therefore spent considerable time filling this gap in the application and working with colleagues elsewhere in the Council to define and scope the use of these spaces. The outcome of this is the provision within the development of a 'Community Involvement Centre' and a community lab/education space. These are discussed below.

#### Community Involvement Centre

- 7.42 The Community Involvement Centre (CIC) would be a multi-purpose space to be provided within the development for community use, codesigned with local community members from groups at risk of poor health outcomes and groups who have historically been less able to participate in life sciences research.
- 7.43 The centre would provide adaptable space which would be used for purposes to be defined with residents through a public engagement process. This may include space for community-led public and patient involvement in research, research dissemination space, training, meetings and touch down space at peppercorn rents for community researchers, and volunteers working to coproduction principles in health and health determinants research.
- 7.44 The applicant has offered space on the ground floor of Plot D1 for this use. At this time Officers do not consider it necessary to tie down the exact location of the CIC within the development given the CIC will need to be delivered in a timely manner (as early in the delivery of the development as possible, even if that means that it is first provided in a temporary location within the site) and there is, at the time of writing this report, uncertainty around the way in which this development will come forward given it is speculative. Provisions for agreeing the location(s) of the CIC can be made within the legal agreement that would be required for this development if permission is granted. In approving the details of the CIC it would need to be demonstrated that:
- The CIC can provide a minimum of one accessible multi-purpose meeting room space capable of seating 40 people and two smaller meeting room spaces with kitchen and toilet facilities and adequate space for secure storage of prams and mobility aids.

- Life science occupiers within the development are committed to locally agreed coproduction principles in their research activities to enable equitable community participation in research by empowering underrepresented communities.
- The CIC would be usable for community researchers working in areas associated with wider health determinants such as housing, jobs, education and the local environment as well as health interventions and services.
- Funding of £2.5m is provided to enable community involvement in research. This funding would include (a) administration costs for the planned community involvement space, and (b) expansion of the Tower Hamlets Health Determinants Research Collaboration's community research coordination network to support a public health research agenda aligned with the Life Science Centre's Health Outcomes Strategy.

Community space – education, skills and associated activities

- 7.45 The Community Lab is needed to provide an opportunity for dedicated educators as well as scientists working within the proposed development to pass on their skills and knowledge to inspire the next generation of scientists. The Community Lab should be designed such to provide schools with access to industry standard life science lab space to gain first-hand experience of life science activities and allow children to develop their analytical skills and gain insight into curriculum choices that will form a good platform to establish a future career in life sciences and STEM more widely.
- 7.46 The applicant has suggested that the Community Lab could be accommodated within Plot A. Some high level layouts have been provided to show how the Community Lab (the former life science gallery which for the avoidance of doubt would be lost were this space in Plot A deemed to be the most appropriate space for the Community Lab) might be accommodated here. However, it has not been established as to whether the Plot A space could accommodate a broad range of life science related education activities suitable for varying age groups across primary and secondary provision or that the space is appropriate when considering factors such as safeguarding and security. Officers therefore recommend that the final location is agreed through an obligation in the required legal agreement should permission be granted. The obligation should also require that the space is provided and run for a minimum of 20 years and provided at peppercorn rent.
- 7.47 Alongside the requirement to deliver the Community Lab as a tangible public benefit and in order to share the benefits of growth there is also a need to provide a Community Education and Outreach Programme – targeting those in primary and secondary education in the borough's schools and in the borough's places of further education.
- 7.48 A Community Education Outreach Programme Strategy will be required to be submitted to and approved by the Council in writing in respect of both schools and adult community outreach programmes. The Strategy should be in place for a minimum continuous period of 20 years with provisions in place to provide certainty that the duration of this timeframe can be achieved.
- 7.49 To manage the Programme it is likely that two FTE Education and Outreach Managers/Education Liaison Managers will be needed in addition to those required to deliver the outreach activities (such as dedicated educators). The applicant has committed to providing the appropriate resources for delivery of the Programme and this will be secured through the required legal agreement, if permission is granted. At the time of discharging the obligation the developer would need to demonstrate that the outreach activities have significant reach into the borough, commensurate with the significant scale of the proposed.
- 7.50 In addition to the above the applicant has agreed to the following which will be secured in the legal agreement if permission were to be granted:
- A 'life science ambassador programme'. This would help support schools and learners through various initiatives such as providing 1:1 mentoring to students who needs support to work through a challenging aspect of study, providing e-mentor careers support, giving

'day-in-the-life' talks, explaining research techniques, advise on CV writing, run an interview techniques programme and work skills programme, supporting after school STEM clubs and support teachers knowledge of life sciences.

- A life science festival to be curated and delivered for the life of the development – aimed at the general public to showcase the role of life science activities and the benefits that flow from it.
- A Skills Escalator Programme which will coordinate across the masterplan areas such as school work experience, internships, adult work experience placements and graduate paid placements

#### Proposed flexible uses

- 7.51 Plots A, B1, B2 and B3 are within the Whitechapel District Centre. None of those parts of the site within the District Centre are located on primary or secondary retail frontages, though they do face primary and secondary frontages on Whitechapel Road and New Road respectively. In addition, the remaining plots lie outside of the Whitechapel District Centre and would also deliver flexible uses. The proposed Use Class for the flexible ground floor spaces is Class E, meaning they could be used for any commercial, business or service use.
- 7.52 Policy D.TC2 part 4 of the Local Plan (2020) states that outside of the Primary and Secondary Frontages within the District Centres, uses that do not require high levels of footfall (e.g. offices) and supporting town centre functions will be supported alongside retail uses. In terms of the plots outside of the District Centre, firstly it is noted these are adjacent to the district centre designation and are smaller retail units than what is available in the heart of the district centre. The applicant has submitted an impact assessment in line with requirements of policy D.TC3 and this is accepted. It is noted by officers that such uses are supported outside of the District Centre where they would not undermine the function of nearby town centres. Given such units will support the delivery of the Life Science campus and are scattered throughout the plots, this would not be the case here and would potentially be of benefit to the Whitechapel District Centre in bringing more business to the town centre itself.
- 7.53 Notwithstanding the principle of space for flexible uses is acceptable, it is to be noted that Officers have expressed concern to the applicant regarding the suitability of these flexible spaces to be used for retail use given some of their sizes and layouts. This is an unresolved issue. The applicant has not provided any information which demonstrates potential occupier interest, nor has any strategy been put forward to minimise the risk of lack of occupier interest and vacancies. One solution to this could be to engage a specialist operator to manage the ground floor commercial spaces as there are several that specialise in leasing space to local SMEs, which would support the objective of enhancing connections with the local community. Engaging a specialist operator would also allow the development to coordinate the ground floor uses across the site, ensuring that the tenants suit the spaces and engage well with the surrounding public realm. This would have been a high impact low-cost option. The benefits arising from the retail strategy alone will be less sufficient. However, in isolation, the lack of a specialist operator would not mean officers would recommend the scheme for refusal.

#### Public toilets

- 7.54 London Plan Policy S6 requires that large-scale developments that are open to the public and large areas of public realm should provide and secure the future management of free publicly accessible toilets suitable for a range of users.
- 7.55 Toilets are proposed within the pavilion building on Plot D2 (St. Philip's Square). If permission is granted then their provision and ongoing access and maintenance would be secured in a legal agreement attached to the permission.

#### Affordable workspace

- 7.56 Local Plan Policy D.EMP2 requires the provision of affordable workspace as part of major commercial and mixed-use development schemes. This must comprise at least 10% of the proposed floorspace, at least 10% discount below the indicative market rate for the location and for a minimum period of 10 years. In addition, the London Plan policy in relation to affordable employment space requires that affordable workspace is secured in perpetuity or for a period of at least 15 years.
- 7.57 In considering which floorspace the affordable workspace requirement applies to it is important to note that D.EMP2 only requires affordable workspace where the proposal is for *commercial* development. As noted earlier in this report, QMUL are intending to occupy Plot C. QMUL has charitable status and therefore would be excluded from the provision of affordable workspace in their plot. To ensure that affordable workspace policy requirements do not become inadvertently circumvented it will be necessary, if permission is granted, to include provision in the required legal agreement to ensure Plot C is occupied by QMUL on a non-commercial basis. If that situation changes then the provision of affordable workspace in a manner which is proportionate to that which has been secured on the wider site would be required.
- 7.58 In terms of the affordable workspace that is proposed within this application this would comprise provision of 10% of the non-Plot C Class E(g) NIA floorspace as affordable workspace i.e. the 'qualifying floorspace' comprising:
- Affordable fitted out incubator space (approximately 65% of qualifying floor space)
    - at least 40% wet lab space
    - balance to be provided as write-up and dry lab space
    - 20% discount to all in costs (i.e. fully inclusive of service charges/membership for AW tenants), compared to market rate for equivalent
  - Entry Level office space (approximately 35% of qualifying floor space)
    - CAT A fit out
    - 50% discount to all in costs (i.e. fully inclusive of service charges/membership for AW tenants), compared to market rate for equivalent
- 7.59 Both types of affordable workspace are to be made available for a minimum of 25 years. Beyond 25 years the applicant has agreed to an additional 10 years of affordable workspace to be provided at 10% discount. It has also been agreed that if granted there will be provision within the required legal agreement for developer-led evidence based reviews to confirm occupancy and take up of the affordable workspace and, if robustly evidenced, from time to time adjust the above. This is considered preferable to space lying empty should there be fluctuations in demand for one use or another. It is not recommended that any approvals under this provision should be given where this results in a significant deviation from the above parameters.

#### Land use – conclusion

- 7.60 All of the proposed uses are acceptable and are compliant with the relevant policies that apply to this site, including the Whitechapel South Site Allocation. The proposed life science and university uses have the potential, particularly when considered in conjunction with the recommended community and health outcome requirements, to deliver benefits for the Borough as well as the region and potentially much further afield depending on the outcomes of research that will take place on the site. In addition, the affordable workspace offer is very good (though necessarily so given the heritage harm that is incurred by the proposed development and various other identified deficiencies) and will provide a variety of spaces with deep discounts to future occupants all of which will be over a significant length of time.

## Design

### Relevant planning policy

#### National

- 7.61 The NPPF requires the creation of high quality, beautiful and sustainable buildings and places which optimise the potential of sites to accommodate and sustain an appropriate amount and mix of development, whilst being sympathetic to local character and history. The NPPF states that LPAs should ensure that they have access to and make appropriate use of tools and processes for assessing and improving the design of development. This includes having regard to the outcomes from these processes, including any recommendations made by design review panels.

#### London Plan

- 7.62 Chapter 3 of the London Plan contains a suite of policies designed to ensure all new development is high quality. Policies D3, D4, D8 and D9 are of particular relevance to this application.
- 7.63 Policy D3 sets out the requirement for a design-led approach through consideration of the form and layout, experience and quality and character of development proposals. Policy D4 is concerned with delivering good design and sets out requirements relating to design analysis, development certainty and design scrutiny (which includes making use of design review, with referable proposals having undergone at least one design review early on in their preparation before a planning application is made) and maintaining design quality. Policy D8 relates to public realm. It encourages new public realm in appropriate locations and sets out various requirements which aim to ensure that new public realm is well designed and fit for its intended function(s). Policy D9 sets out impacts that tall building proposals should address. These include visual impacts (long, mid and immediate views), consideration of spatial hierarchy, architectural quality, avoiding harm to heritage assets and their setting, glare, light pollution, access, servicing, economic impact, wind, daylight, sunlight, noise and cumulative impacts.

#### Local Plan

- 7.64 Policies S.DH1 and D.DH2 of the local plan seek to ensure that buildings and neighbourhoods promote good design principles to create buildings, spaces and places that are high-quality, sustainable, accessible, attractive, durable and well-integrated with their surrounds. Policy D.DH6 of the Local Plan considers building heights and tall buildings to ensure that proposals for tall buildings are located in accordance with a spatial hierarchy and satisfy a range of criteria.
- 7.65 Proposals which include tall buildings but which are not located in Tall Building Zones are expected to comply with the exception criteria set out in Policy D.DH6. In summary, the exception criteria are that proposals must:
1. Be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas.
  2. Address deficiencies in the provision of strategic infrastructure.
  3. Significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area, and
  4. Not undermine the prominence and/or integrity of existing landmark buildings and tall building zones.
- 7.66 As noted earlier in this report, the site falls within the Whitechapel South Site Allocation. The Allocation includes a number of 'design principles' that development within the boundaries of the allocation will be expected to address. The principles are set out in full in the assessment that follows.

## Design review

- 7.67 During the pre-application phase on 14 June 2021 the applicant presented their proposal to the Council's design review panel, at that time named CADAP – Conservation and Design Review Panel and now replaced by the Quality Review Panel.
- 7.68 The Panel commented that the overall scale of the development was too significant to be presented in one meeting, and that the complex proposal needed to be broken down into a series of more focused meetings. The Panel therefore encouraged the applicant to return with more focused sessions looking at the various plots. In addition, the Panel were of the view that there was too much floorspace being proposed on too small a site, and assurance was sought that the development was a life science development and not a general office space.
- 7.69 Notwithstanding the in-principle concerns regarding how the proposal was presented and the quantum of development proposed, the comments of the Panel are summarised below:
- Heritage: Not enough attention was given to the wider heritage of the hospital and the case had not been made for demolition of the outpatients building. Heritage led aspects of the proposals need further development.
  - Public realm:
    - The structure of the masterplan looked good.
    - More understanding of ground floor uses is required.
    - Overshadowing of London Square needs to be better presented.
    - Concerns about the move away from the Green Spine and narrowness of 'Hospital Walk' (the route between D1 and the Royal London Hospital) creating an unattractive place.
    - Servicing strategy needed to be better understood.
    - Microclimate and wind studies would be needed.
  - Form and massing:
    - Massing of proposed buildings was very large and uncomfortable, with Plot D1 being the most difficult to deal with.
    - Concerns over potential harm to the Grade II listed Town Hall.
    - Concerned about the potential overshadowing of London Square.
    - The effects of the proposed form and mass on wind, daylight, sunlight and overshadowing needs to be understood.
    - The proposal should create a diverse range of buildings across the site, avoiding the architecture of standard commercial buildings.
  - Sustainability: Embodied carbon would need to be considered.
- 7.70 In addition to review by CADAP, during the course of the application planning, design and conservation Officers met with the applicant team to discuss changes to the proposal as originally submitted. This was with the aim of improving the design, form and layout of the development and improving its relationship to its surroundings including in relation to heritage assets (conservation areas, listed and locally listed buildings). The culmination of these meetings was the submission of amended proposals which were consulted on late in 2023.
- 7.71 Noting CADAP's request to have the proposal referred back to them and the London Plan requirement for proposals to be referred for design review at least (emphasis added) once, Officers advised the applicant that they should present the proposal (as amended) back to LBTH's design review panel for their further comment.
- 7.72 Whilst Officers cannot insist that the proposal is referred back to LBTH's design review panel, it would clearly have been far preferable had the applicant team engaged more fully in the design review process as this would have given an additional level of scrutiny to what is proposed. Without this having taken place there is a gap in the design review process and it



is not possible to say with absolute certainty that the highest quality possible is being proposed on this sensitive site.

#### Whitechapel South site allocation design principles

7.73 The Officer assessment against each of the design principles within the Site Allocation is provided below.

#### Design principles – criterion a

7.74 Criterion a states that development will be expected to:

*Respond positively to the heritage assets and existing character, scale, height, massing and fine urban grain of the surrounding built environment, including the setting of the London Hospital Conservation Area*

7.75 Key context information in relation to the site and heritage matters is:

- Plot A is located within the Former London Hospital Conservation Area and comprises an area of car parking that wraps around three sides of the grade II listed Mount Terrace properties. The Whitechapel Market and Myrdle Street conservation areas lie to the immediate north and west respectively.
- Plot B contains the former Outpatients Department, which is within the London Hospital Conservation Area. The plot also contains the former Outpatients Department annexe and boiler house, which lie just outside of the conservation area.
- Plot C contains the former Institute of Dentistry and is located between the Former London Hospital and Myrdle Street conservation areas.
- Plot D contains two vacant sites, separated by Stepney Way, which are located within the Former London Hospital Conservation Area. The site to the south of Stepney Way is immediately adjacent to the grade II\* listed former St Augustine with St Philip's church.

7.76 The proposed development would result in buildings that would have some challenging relationships with adjacent streets and spaces, due to elements of their scale mass and design.

7.77 Following submission of the application, Officers raised concerns about a number of elements of the proposal. These resulted in the submission of various updated drawings and documents referred to by the applicant as 'the addendum submission'. Officer assessment of the proposals for which permission is sought is set out below.

#### *Plot A*

7.78 The plot wraps around three sides of the late eighteenth/early nineteenth century Mount Terrace, the properties within which are Grade II listed. Mount Terrace was originally longer at its eastern end. Other currently vacant parts of the site were also occupied by terraced properties – one terrace along the site frontage to Whitechapel Road and a terrace of four properties fronting New Road.

7.79 The proposed building on Plot A would adjoin either end of Mount Terrace and complete the perimeter block to all sides – Whitechapel Road, New Road and Turner Street.

7.80 The scale of the proposed building at both ends is broadly the same as Mount Terrace properties. Additionally, the closest part of the new Plot A building has been designed to be of a height and width that is the same as the Mount Terrace dwellings. Whilst the fenestration arrangement on this part of the building does not seek to replicate that of the terraced properties it has been designed such that it would provide a sympathetic yet interesting transition between new and old.

- 7.81 A small flexible use commercial unit is proposed on the corner of Mount Terrace and New Road. This would assist in providing a degree of animation to the street which, notwithstanding concerns about the size and layout of some of the retail units including this one, is important given the location of this part of the site in the Whitechapel District Centre.
- 7.82 The overall scale of Plot A would strike a good balance between respecting the presence and scale of the listed Mount Terrace properties and providing an appropriate and contextually scaled building which acknowledges its presence within a District Centre.
- 7.83 In terms of how the Plot A building would respond at street level to its location in a District Centre, the ground floor of Plot A would have a high degree of activation by virtue of provision of flexible commercial units to over half of the frontage to Whitechapel Road and glazed frontage into the lobby for the proposed life sciences space within this building as well as the community space proposed at the eastern end. Amendments secured during the application phase improved scale and robustness of the ground floor frontages, with the proposals as now submitted being high quality.
- 7.84 For these reasons the proposed development on Plot A has been assessed as responding positively to heritage assets and existing character, scale, height, massing and fine urban grain of the surrounding built environment, including the Former London Hospital Conservation Area within which Plot A is located. Officer's overall assessment of the development proposed for Plot A is that it satisfies the requirements of criterion 'a' of the Whitechapel South Site Allocation.

#### *Plot B1*

- 7.85 This plot is located on the south side of Mount Terrace, between New Road and the Ambrose King Centre and Graham Hayton Unit on Plot B2.
- 7.86 When on Mount Terrace the proposed building would be read from street level as three storeys in height with a parapet height set above that of the Mount Terrace houses. There would also be a fourth storey which would be set back from the north elevation, which would not be readily visible at street level except for when at the east or west ends of Mount Terrace. The effect of this set back is that for street level experience of this building will be that it is three storeys opposite a three storey terrace (albeit the commercial floor to ceiling height is greater than that of the residential properties). This is an appropriate response to the context formed by the presence of the listed buildings.
- 7.87 The southern elevation would read as between three and four storeys on its southern elevation and no parts of this would be set back. The scale as it would appear here would provide a comfortable transition to the larger building proposed to the south on Plot B3 (former outpatients buildings).
- 7.88 The southern elevation has been designed to have a regular fenestration arrangement across first and second floor levels facing Mount Terrace. The proposed rhythm responds to that of Mount Terrace and is an appropriate response to the setting of the listed houses of Mount Terrace.
- 7.89 The proposed building is, however, less successful at ground floor level. A consequence of not having consolidated servicing arrangements on this site is that the building would have a large expanse of inactive frontage to Mount Terrace since the back of the loading bay/waste storage area, a substation and cycle store would all be provided at ground level. Similarly, the south elevation to former Pasteur Street (proposed 'Turner Yard') would be undermined by the presence of the loading bay entrance.
- 7.90 Officers have also expressed concerns regarding non-back of house areas at ground floor. To the western end of the building facing New Road a small 'flexible space' is proposed. It is unclear what this would feasibly be used for as it is adjacent to the loading bay with no possibility of a connection into the remainder of the building. Notwithstanding, the provision

of the retail strategy (discussed earlier in this report) will go some way to alleviating these concerns.

- 7.91 At the eastern end of the building ground floor life science space is proposed, which would help to enliven that end of the building. However, the southern elevation would be significantly compromised by the aforementioned proposed loading bay entrance.
- 7.92 The proposed building would respond positively to the scale, height and massing of heritage assets. However, for the reasons set out above regarding the poor manner in which the building addresses the surrounding streets at ground level it is concluded that Plot B1 would be less successful in responding to the existing character and fine urban grain of the surrounding built environment.

#### *Plot B2*

- 7.93 This plot is the building within which the Ambrose King Centre and Grahame Hayton Unit are located. When this application was first submitted it was proposed to alter and extend this three storey 1920s building. However, as explained earlier in this report this would have conflicted with the requirements of the site allocation since no alternative provision of sexual health / HIV services was proposed as part of the application. As such within the amended application submission, the buildings remain and no physical alterations or extensions are proposed to the building on Plot B2.
- 7.94 Whilst that is the case, Officers have observed that the Ambrose King Centre and Grahame Hayton Unit building could benefit from some remedial works to its exterior as it currently has a somewhat run down appearance. The building is located within the site boundary and would be surrounded by new built development and public realm as part of this proposal. If the building were to remain in its current state, the intended comprehensive and masterplanned appearance of the final development would be diminished.

#### *Plot B3*

- 7.95 The proposal for this plot involves the demolition of the outpatients department building with the exception of the southern and eastern elevations and a section of the north elevation where Turner Street turns the corner into former Pasteur Street. In addition, the Outpatients Department Annexe would be demolished in its entirety.
- 7.96 The proposed development of Plot B3 is discussed in more detail in the heritage section of this report, though in relation to whether the proposal for this plot addresses the requirements of criterion a of the Whitechapel South site allocation, Officers note that:
- Historic England objected to the proposal as originally submitted and have maintained their objection as part of the reconsultation following submission of the amendments.
    - As originally submitted, part of Historic England's overall objection was based on concern about the scale of the proposed new structure behind the retained elevations, and the way it unbalances the composition. The loss of the Annexe was also noted as regrettable.
    - Following amendments to the proposal, Historic England stated that the proposal would continue to cause harm to the character and appearance of the conservation area, noting that the proposal would largely strip the building of its architectural form and character associated with its original use as well as largely losing historic fenestration and glazing patterns on the ground floor east elevation.
  - LBTH's Conservation Officer has concluded that:
    - The proposal would undoubtedly cause significant harm to the Outpatients Building itself and harm to the Former Royal London Hospital Conservation Area.
    - The loss of the distinctive Outpatients Annexe building would cause harm to the setting of the former London Hospital Conservation Area, especially with regard to the setting of the Former Outpatients Building.

- 7.97 Officers agree with the conclusions of the assessments made by Historic England and LBTH's Conservation Officer on the proposals for Plot B3. Notwithstanding, it is acknowledged that through the life of this application some positive changes were made to the design of the new build elements of this proposal. This included breaking down the originally proposed monolithic north elevation by introducing steps in the elevation. This change has echoes of the north elevation of the former outpatients building that would be demolished if this proposal were to go ahead. This means that the proposal now responds more positively to heritage assets and the grain of the Conservation Area than as originally submitted. In addition, the architectural treatment of the elevations has been refined and now presents itself as a much more bespoke and less generic response. This is considered positive given that the new build elements of this proposal would be introduced in a sensitive historic area.
- 7.98 Whilst there are some positive elements of the proposals for this plot, because of the degree of demolition that is proposed and the scale of the replacement building Officers overall assessment of the development proposed for Plot B3 is that it does not fully satisfy the requirements of criterion 'a' of the Whitechapel South Site Allocation.

#### *Plot C*

- 7.99 As noted earlier in this report, there is an existing building on Plot C – the former dental hospital and students' union. The existing 1960s building has been carefully designed such that the eaves height of its lower section takes reference from and responds to the scale of historic buildings around the site. Similarly, the rhythm of vertical columns along its frontage takes cues from the rhythm of Georgian buildings in the vicinity.
- 7.100 On the opposite side of Newark Street, the development between New Road and Turner Street comprises the Queen Mary Innovation Centre and the Blizzard Institute. Though there are two taller elements, these present to Newark Street as slender elements. The majority of the existing built frontage along the south side of this section of Newark Street reads as four stories in height, this being not markedly different to the predominant built scale in the locality. In addition, relief is provided by the public square where the neuron pod is located.
- 7.101 In contrast to the existing situation on Plot C where a taller building element sits above a more modestly scaled podium, the proposed Plot C building would present a sheer wall of development to the street. The Plot C building would have an overbearing and harmful impact on Newark Street and Stepney Way by presenting this wall of development sitting on the back of the pavement with no set back.
- 7.102 Consideration also needs to be given to the potential of Plot C development to have a detrimental impact on the character and appearance of neighbouring streets, which would include harm to the setting of the Myrdle Street Conservation Area on the opposite side of New Road.
- 7.103 The height of the Plot C building has been reduced during the course of this application. This means that the shoulder height of the building would have a less dominant presence in the streetscene compared to that originally submitted. There have also been changes to the elevational treatment including by introduction of vertical columns on upper floors to break down the original proposed horizontal emphasis of the building. Together, these changes result in a building which now better reflects the prevailing character of New Road, and particularly the Myrdle Street Conservation Area.
- 7.104 Whilst some improvements have been secured to the Plot C building through the course of the application, Officers conclude that overall criterion 'a' of the Whitechapel South site allocation is not fully complied with because of the identified issues that remain with regard to the overbearingness of the proposed building on this plot.

#### *Plot D1*

7.105 The proposed development of Plot D1 is discussed in more detail in the heritage section of this report, though in relation to whether the proposal for this plot addresses the requirements of criterion a of the Whitechapel South site allocation, Officers note that:

- Historic England objected to the proposal as originally submitted and have maintained their objection when reconsulted following submission of the amendments.
  - As originally submitted, part of Historic England's overall objection was based on concern about the proposed building being informed by the modern hospital buildings further east rather than the character of the surrounding conservation area. Historic England stated that this would be particularly noticeable in the view from Whitechapel Road, where the building would dominate the setting of the former Whitechapel Hospital (now the Town Hall) and in some views would appear as a dense backdrop to the Grade II\* listed St. Augustine with St. Philip's Church.
  - Following amendments to the proposal, part of Historic England's updated objection stated that the proposal would continue to cause harm to the former Whitechapel Hospital and conservation area.
- LBTH's Conservation Officer has concluded that the proposal would cause harm to listed buildings in proximity and conservation areas including the Former London Hospital Conservation Area in which the site sits and nearby conservation areas.

7.106 The height of Plot D1 would be 65m. This compares to 80m for the new Royal London Hospital building and 29m for the new extension of the former Royal London Hospital building now home to the Tower Hamlets Town Hall. The spire of the listed St Augustine with St Philip's Church has a height from ground of 30m.

7.107 In a north-south direction along the proposed Hospital Walk, the building would extend for 68m in length. In an east-west direction it would extend for 45m length.

7.108 As can be readily understood from the above dimensions, the proposed D1 building is of a significant scale. Its scale and mass are more comparable to the new Royal London Hospital than the fine urban grain of the surrounding built environment.

7.109 Officers acknowledge that post-submission the proposed D1 building was reduced in height. However, taking cues for scale from the Royal London Hospital Building is not the appropriate response in this situation. The circumstances surrounding the Royal London Hospital were entirely different. Whilst the Hospital building is not without its issues in terms of relationship to the surrounding area, including heritage assets, the significant and tangible public benefits associated with that development would have been factors carrying significant weight in the determination of the Hospital proposal.

7.110 Whilst the Royal London Hospital is clearly a prominent building in the vicinity of the application site, it does not define the existing character, scale, height, massing and fine urban grain of the built environment in this location. Those attributes are defined by lower buildings such as those seen on the Whitechapel Road frontage (including the Town Hall), the former outpatients department building and outpatients annexe, Gwynne House and terraced residential properties. The Plot D1 building is clearly entirely out of scale and character with these low-rise surroundings that form the predominant character of the surrounding built environment. For these reasons Officers conclude that criterion 'a' of the Whitechapel South site allocation is not fully complied with in relation to Plot D1.

*Design principles – criteria b, c, c, e, f, g and h*

7.111 These criteria relate to movement, connections, public realm and open space. They state that development will be expected to:

*b. Restore and/or enhance connections between neighbouring strategic sites, particularly north of Whitechapel Road and ensure the streetscape and the wider context, including design and character, are addressed.*

*c. Create a sense of place set around a public square behind the former Royal London Hospital building and new public square immediately to the east of St Augustine with St Philip's Church to positively integrate the life sciences and research hub with the new civic centre and the green spine.*

*e. Walking routes and spaces which are accessible to cyclists should be supported through the Green Spine, but should not jeopardise its role and function as a publicly accessible open space.*

*f. Create a sense of place and improve access to and enjoyment of the Green Spine to promote healthy living.*

*g. Repair the fragmented urban form to create a legible, permeable and well-defined movement network.*

*h. Facilitate the delivery of consolidated interconnected open spaces to form the Green Spine which will link Whitechapel District Centre to Commercial Road through the following:*

- i. Provision of new and improved green open space (the Green Spine) stretching from Philpot Street to the new civic centre. It should be linear in nature and provide a direct visual link across its length.*
- ii. Buildings adjacent to the Green Spine should make a positive contribution to reinforce north-south legibility with permeable routes and visual links through the new development.*
- iii. Existing consented open space which has yet to be implemented on site is an integral element to the provision of one hectare of strategic open space and should be re-provided. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new Green Spine to maximise its multi-functional use.*

#### *The Green Spine – policy background*

7.112 The Green Spine is identified as a means through which Local Plan Key objective 2 – Sharing the benefits of growth – will be implemented. The Green Spine would contribute to this by providing for environmental net gains, promoting community cohesion through accessibility of spaces and places and by bringing an improved quality of life, health benefits and reduction in health inequalities. The Green Spine is one of the Borough's Green Grid projects and an initiative which would contribute to an enhanced network of open spaces in the borough. The Green Spine is identified in the Local Plan 'Vision for City Fringe' as something that will provide a focal point for leisure and community/social activities.

7.113 The Local Plan envisages the Green Spine to be a linear open space running from Commercial Road up along Philpot Street to the new civic square behind the Town Hall. The Local Plan Whitechapel South Site Allocation diagram shows the Green Spine as part of the Green Grid proposals for Whitechapel. Whilst the diagram is for illustrative purposes, it gives an indication as to the scale and ambition for this piece new green infrastructure.

7.114 In addition, the City Fringe Opportunity Area Planning Framework (OAPF) includes provision for 'Priority public realm and open space improvements' in the same alignment as the Local Plan Green Spine. Under the Strategic Design Principles for this it is stated that '*A north-south linear park should form the spine of the campus and provide a generous green open space to the wider community. Development along this space is expected to reflect its importance both in building height and ground floor uses. It is important that this park has a strong presence on Whitechapel High Street and a creative approach to how this can be achieved through the Hospital Building will be required.*'

Figure 5.16 from the OAPF shows the strategic principles for Whitechapel. This has been included in Appendix 2.

#### *The Green Spine planning application proposals*

- 7.115 The Local Plan diagram envisages that the Green Spine would pass through two areas of the application site:
- Between the eastern edge of the Plot D1 building and the western edge of the Royal London Hospital building (referred to by the applicant as 'Hospital Walk').
  - Between St. Augustine with St. Philip's Church and the western edge of the Royal London Hospital building (where the Local Plan requires a new public square).
- 7.116 In terms of the section next to the Plot D1 building, there is an existing narrow north-south pedestrian connection running between London Square and Stepney Way adjacent to the western edge of the Royal London Hospital. The proposed Hospital Walk would also follow a north-south alignment, but with proposals to widen it and offer other improvements over the existing situation.
- 7.117 Throughout the course of the application, the proposal for Hospital Walk has been amended to try and address some of the Officer level concern about the width, alignment and quality of this space.
- 7.118 The 'Hospital Walk' section of the Green Spine would now have a width of around 16 metres to around 19 metres at ground and first floor levels. This additional width was achieved by introducing a double storey colonnade which has the effect of widening the space at ground and first floor levels as well as improving sight lines. At upper levels the space between the building would also vary according by a greater degree, according to the profile of the adjacent building. The addition of the colonnade and the increased width would have the additional effect of improving sight lines across this space, which partly addresses Officer concerns about the kink in the alignment that was originally proposed. However, it remains the case that the success of this new space would be compromised by its overall width and siting between two buildings of significant scale. In addition, the proposed Plot D1 building would affect the new public space (London Square – which forms the northernmost part of the Green Spine) immediately to the south of the new Town Hall. The scale of the Plot D1 building would result in this space feeling enclosed and oppressive. It would also limit sunlight exposure into London Square.
- 7.119 As part of the wind mitigation strategy Hospital Walk would feature trees planted in a combination of raised planters and containers. Other planting would be in raised beds, needed to ensure that there is sufficient soil depth due to the presence of basements below.
- 7.120 The width and alignment of this section of the Green Spine are not consistent with the diagrams in the above referenced documents. However, the provision of a significantly improved north-south connection across this part of the site would ultimately provide a key missing piece of the Green Spine which is undoubtedly a public benefit.
- 7.121 In terms of the Green Spine where it would pass through the new public square to the east of St. Augustine with St. Phillip's Church, this would sit more comfortably with the aspirations for this new piece of infrastructure in terms of its scale (by virtue of it being integrated with the new public square), directness, visibility and ability to be used in a multifunctional way. It is, however, noted that the Plot D1 building would have a looming presence over the new square to the east of the listed former Church. To a limited degree this would be detrimental to the attractiveness of this section of Green Spine.
- 7.122 Officers do, however, note that the landscape plans are somewhat misleading as they indicate an area outside of the application site around the Queen Alexandra statue to be paved in Yorkstone flags, consistent with the paving proposals in the adjacent part of the new public square. Any landscaping matters within the red line would be controlled by condition should permission be granted.

*Design principles – criterion d*

- 7.123 The remaining criterion from the Whitechapel South Site Allocation design principles is criterion d which states that development will be expected to maximise the provision of family homes.
- 7.124 The proposed development does not include residential within its proposed mix of uses. This is acceptable within the context of the land use mix set out in the Site Allocation and noting that the application site forms part of a wider site allocation where residential development has come forward (Silk District) as well as the opportunity for residential development as other sites come forward in the vicinity.

Whitechapel South Site Allocation design principles – conclusion

- 7.125 Some aspects of the proposed development respond positively to the heritage assets and the existing character, scale, height, massing and fine urban grain of the surrounding built environment including the setting of the Former London Hospital Conservation Area. However, the majority of the plots are proposed to be developed in a manner which does not fully meet the design principles of the Site Allocation. The overall development would appear over-scaled and out of character with the built environment attributes of most positive character in and around the site.
- 7.126 In addition, the scale and layout of the development coupled with the proposed routing and landscaping arrangements is such that the proposals would not fully deliver the Site Allocation design principles relating to public realm. This is most evident around the ‘Hospital Walk’ section of the Green Spine in relation to the ability of the proposals for this space to create the sense of place that is required by the Allocation. It is, however, acknowledged that the application is proposing a new area of public realm following the alignment envisaged for the Green Spine in the Site Allocation.
- 7.127 Officers conclude that the proposed development as a whole would not fully address the design principles of the Local Plan Whitechapel South Site Allocation. The identified deficiencies will need to be balanced against the benefits that will be delivered by the proposed development by the decision maker.

Tall buildings

- 7.128 The London Plan and Local Plan both require a plan-led approach to the provision of tall buildings. Accordingly, the Local Plan has identified areas in which tall buildings are acceptable in principle, known as Tall Building Zones (TBZ). The application site is not within one of the borough’s TBZs. The proposal therefore falls to be considered against the exception criteria set out in Local Plan Policy D.DH6.
- 7.129 The exception criteria require that in addition to demonstrating compliance with various criteria under part 1 of the policy, proposals will be required to demonstrate how they will:
- a. be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas;
  - b. address deficiencies in the provision of strategic infrastructure;
  - c. significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area, and
  - d. not undermine the prominence and/or integrity of existing landmark buildings and tall building zones.
- 7.130 The Officer assessment against each of the exception criteria is provided below.

Tall buildings policy exception criterion ‘a’

- 7.131 The site has a PTAL of 6a and 6b. This means the site benefits from the highest levels of public transport accessibility. It is also close to and partly within the Whitechapel District Centre and also within the City Fringe Opportunity Area. For these reasons the proposal accords with exception criterion ‘a’.



Tall buildings policy exception criterion 'b'

- 7.132 The Green Spine is, in principle, capable of being considered 'strategic infrastructure' since it would comprise public open space which would serve more than the immediate area.
- 7.133 Officers assessed, above, the adequacy of the proposed Green Spine against the Local Plan Site Allocation design principles. This includes the width and alignment of the space adjacent to Plot D1 as well as its quality being seriously impaired by being located between two tall buildings. The characteristics of the proposed Green Spine in the form of Hospital Walk would not result in the linear park that is envisaged by the OAPF. Its character would be that of an enclosed passage rather than an attractive multifunctional strategic open space capable of addressing the key objectives required of it by the Local Plan.
- 7.134 Whilst from an urban design perspective there is clearly scope for improvement to some elements of the proposed 'Hospital Walk' section of the Green Spine i, in terms of the provision of strategic infrastructure this part of the proposal together with the proposed St. Philip's Square are such that it can be concluded that exception criterion 'b' is complied with.

Tall buildings policy exception criterion 'c'

- 7.135 The site is partially within the Whitechapel District Centre (Plots C and D2 and most of D1 fall outside of its boundaries, the remainder is within). The existing centre is characterised by a bustling high street along Whitechapel Road. The new Town Hall has created a rejuvenated historical landmark within the District Centre, and a renewed civic and visual focal point within the area. Improvements to Whitechapel Station in advance of the opening of the Elizabeth Line have enhanced the presence of the station within the street. When all of these factors are taken into account, Officers are of the view that the area is already highly legible and does not require development in the form of tall buildings to strengthen this. Indeed, for reasons explained elsewhere in this report, the proposed building on Plot D1 would undermine the prominence of the listed Town Hall. For these reasons the proposal does not meet the requirements of exception criterion 'c'.

Tall buildings policy exception criterion 'd'

- 7.136 Existing landmark buildings around the site are the new Royal London Hospital and the Tower Hamlets Town Hall (i.e. the listed former Royal London Hospital). The scale and massing of the Plot D1 building would create a poor composition with the other buildings within its context and undermine the prominence of the Royal London Hospital building and the Tower Hamlets Town Hall. For these reasons the proposal does not meet the requirements of exception criterion 'd'.

Tall buildings policy exception criteria - conclusion

- 7.137 The site is located within a highly accessible location and is providing strategic infrastructure. Two of the exception criteria are therefore being met. However, the proposal, would weaken legibility in the area and undermine the prominence and integrity of existing landmark buildings. The proposal would therefore not meet the exception criteria for tall buildings outside of defined Tall Building Zone.

Local Plan Tall buildings policy – other criteria

- 7.138 Though the proposal does not comply with the exception criteria, it is still necessary to consider the proposals against part 1 criteria of Policy D.DH6
- 7.139 In terms of scale, Plot D1 is the largest building and therefore potentially has the greatest impacts. The proposed Plot D1 building would exhibit proportions similar to the new Royal London Hospital building, would dominate views of the surrounding lower rise buildings and would not mediate between the two scales of development.

- 7.140 Therefore instead of making a positive contribution to the townscape of the area, by helping to mediate between the scale of the Royal London Hospital and the lower rise buildings of the adjacent conservation areas, the building on Plot D1 would exacerbate the impact of the hospital by bringing large scale development much closer to the lower rise townscape and increasing the harmful and overbearing impact. The dominance of the proposed building is exacerbated by it being closer to Whitechapel Road than the taller elements of the adjacent new hospital building.
- 7.141 Other tall buildings on the site are Plot B3 (the plot of the former outpatients building / annexe) extending to 35.8m in height and the Plot C building extending to 32.4m in height. The scale of these buildings has been discussed above in relation to the Whitechapel South Site Allocation design principles, where it was concluded that these buildings would not meet criteria a. Whilst Officers acknowledge that the site is within a highly accessible location and an Opportunity Area, this does not outweigh the harm caused by the incompatible scale, mass and volume of the Plot B3 and Plot C buildings with the sensitive heritage and townscape context of the surroundings.
- 7.142 In terms of the street level experience this is compromised by the proposed non-consolidated servicing arrangements. The effect of this is that there is a proliferation of service bays across the site, rather than one central bay that serves the entire development. This is an extremely poor solution for servicing and not one that would be expected within a development that covers a significant part of a Site Allocation.
- 7.143 The Plot D1 building features a very large servicing bay in the southwest corner, facing onto the listed church and new public square. The way in which this servicing arrangement would dominate the relationship between the building and public realm would be detrimental to the character of the area. Officers note that the landscape plans show that the area between the service bay door and the public highway would be paved in Yorkstone setts to match the area beyond the building envelope. On plan this has the effect of making the public realm appear more generous than it would be on the ground, since in reality it would not be possible or desirable to use the area within the building envelope outside of the loading bay door as an additional area of public realm.
- 7.144 The southern frontage of the proposed building on Plot C would be dominated by a large servicing bay, which would be detrimental to the visual appearance of the immediate area. The scheme amendments include incorporating three glazed display bays to the ground floor façade. These will help to add some visual interest and will to some degree will help mitigate the impact of the loading bay. The detailed design of these display bays could be controlled by condition to help maximise their contribution to the appearance of the public realm. Notwithstanding, the combination of the loading bay entrance and the areas of wall sitting in front of it significantly undermine the quality of the street address of this elevation, even with the proposed areas for display.
- 7.145 Other instances of the servicing arrangements undermining the quality of the street frontages are in relation to Plots B1 and B3. The deficiencies of Plot B1 have been discussed earlier in this report. In relation to Plot B3 two service bay entrances are proposed in order that vehicles enter through one door (from the south) and leave via the other (to the north, onto former Pasteur Street – referred to by the applicant as Turner Yard). Not only is the number, location and size of these service doors detrimental in terms of the street address, the arrangement would undermine the success and usability of Turner Yard. It has been highlighted elsewhere in this report that a drawing showing the swept path analysis between Plots B1 and B3 states on an annotation 'If service yard occupied, vehicle can be unloaded from Turner Yard. Vehicle can turn once service yard vacated.' This would significantly compromise the quality and function of what is supposed to be a new high quality piece of public realm and is another negative consequence of the non-consolidated servicing arrangements that are proposed.
- 7.146 Beyond the issue of the impact of the non-consolidated servicing arrangements on the street level address of the proposed buildings, it is also apparent that some of the proposed building frontages will be relatively inactive, or it is unclear how active the frontage will be. Some plots

feature flexible uses at ground floor, which makes it difficult to understand the degree to which the scheme will provide active frontage in various places.

- 7.147 In addition, there are other sections of flexible ground floor uses that present similar challenges including on the eastern edge of plot A, the western section of plot B1, the western section of plot C along with sections of the northern and southern frontage of plot D1. The frontages of B1 and C that face onto New Road are particularly concerning because they propose standalone spaces that are isolated from the rest of the building circulation.
- 7.148 It is also unclear how much the entrance/reception areas will contribute to the provision of active frontage. Like the proposed flexible uses, these are shown to feature glazed frontages with entrances. However, the degree to which these spaces will provide active frontage will depend on the detailed design and internal configurations which are not known at this stage.
- 7.149 The matter of ensuring a high degree of active frontage was extensively discussed with the applicant team through the course of the application. Officers are concerned to prevent situations such as occurred at the Queen Mary Innovation Centre where there used to be a coffee shop on the corner of New Road and Walden Street, but there is now a 'flu camp' with inactive frontage.
- 7.150 Notwithstanding these concerns a reasonable level of mitigation could be provided by attaching conditions to the permission, if granted, relating to degree of active frontages to be retained. This would include in relation to frontages which serve entrance lobbies which not only would address the above issues, but would also ensure areas of public realm such as that outside Plot C / Gwynne House would be adequately overlooked which will assist with the prevention of antisocial behaviour. The applicant has also agreed to a retail strategy. Within this it is expected that the matter of maintaining attractive commercial frontages is addressed.
- 7.151 In terms of whether the proposed architecture is exceptional, innovative and sustainable as required by D.DH6, it would have been beneficial to have received further comments on the proposal from LBTH's design review panel.

#### Design - conclusion

- 7.152 Insofar as applicable to the above analysis, Officers conclude that the proposal does not accord with the criteria set out in Local Plan Policy D.DH6.
- 7.153 Other criteria within part 1 of D.DH6 relating to designated townscapes, heritage assets, historic skylines and amenity impacts these are discussed in other sections of this report.
- 7.154 The identified deficiencies in the design of the proposed development will therefore need to be weighed against any benefits arising from the development (discussed later in this report).

#### **Heritage**

- 7.155 The Council has a statutory duty to consider a proposal's impact on heritage assets, including listed buildings and their settings and conservation areas. This is contained in Sections 66(1) and 72(1) (respectively) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and is reflected in national, regional and local policy and guidance.
- 7.156 Section 16 of the NPPF entitled "Conserving and enhancing the historic environment" contains guidance in consideration of development proposals and their effect on the historic environment. Section 16 of the NPPF is consistent with the aforementioned statutory duty in requiring that determining planning authorities give great weight to an assets conservation.
- 7.157 Paragraph 203 of the NPPF states that in determining planning applications local planning authorities need to take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

7.158 Paragraphs 208 to 209 set out the process for where a proposal leads to substantial or less than substantial harm to the significance of a heritage asset and the effect of an application on non-designated heritage assets.

7.159 London Plan Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

7.160 Local Plan Policy S.DH3 requires that development proposals preserve or, where possible, enhance the borough's designated and non-designated heritage assets. This requirement applies to both above and below ground assets as well affects considerations of setting.

#### Former London Hospital Conservation Area

7.161 As the name for this CA suggests, it is focused on the special architectural and historic interest of the former Grade II Royal London Hospital complex and its environs. The Conservation Area character appraisal and management plan 2021 (CAMP) notes that whilst there are some residential terraces in the CA, namely those on Mount Terrace, Philpot Street and Walden Street, the CA is largely characterised by detached or stand-alone institutional buildings mostly associated with the hospital use.

7.162 A plan showing the boundary of the CA as well as listed and locally listed buildings contained therein is included in Appendix 2.

7.163 In terms of how the proposed development affects this CA, this is from a combination of the plots being located entirely within it, partially within it or adjacent to the CA i.e. within its setting.

7.164 Plots A, B2, D1 and D2 are located entirely within the CA boundaries. Plots B2 and C are located outside though immediately adjacent to the CA, and therefore affect the setting of the CA. Plot B3 is part-in and part-out of the CA (the former Outpatients Department Annexe being the part that is not within the CA, and thus affects the setting of the CA.

#### Whitechapel Market Conservation Area

7.165 This CA runs along the north side of Whitechapel Road, taking in the historic frontage between Cambridge Heath Road to just beyond Valance Road, as well as areas to the north of the railway line.

7.166 The CAMP notes that the Whitechapel Road frontage is significant because it is a sustained stretch of fine grain historic buildings.

7.167 A plan showing the boundary of the CA as well as listed and locally listed buildings contained therein is included in Appendix 2.

7.168 None of the proposed development is located within this CA. Potential impact is therefore limited to setting only.

#### Myrdle Street Conservation Area and Ford Square Conservation area

7.169 The heart of the Myrdle Street CA is located to the west of the Former Royal London Hospital CA on the opposite side of New Road, though the CA also extends southwards down to Canon Street Road. Original buildings in the CA do not exceed six storeys, and most do not exceed four storeys. A key element of the significance of this CA is that areas of development within the CA were carried out by the Royal London Hospital. The Ford Square Conservation area to the southeast is a small tightly bound conservation area to the south of Stepney Way. The

character appraisal notes that the conservation area maintains its consistent historic scale which comprises low rise two to four storey residential terraced housing.

- 7.170 A plan showing the boundary of the Myrdle Street CA and the Ford Square CA as well as listed and locally listed buildings contained therein is included in Appendix 2.
- 7.171 None of the proposed development is located within either of these CA's. Potential impact is therefore limited to setting only.

#### Assessment of the effect of the proposed development on heritage assets

##### Plot A

- 7.172 As noted above Plot A is located within the Former London Hospital Conservation Area. The Whitechapel Market Conservation Area is to the north on the opposite side of Whitechapel Road and Myrdle Street CA is to the east on the opposite side of New Road.
- 7.173 The plot wraps around three sides of the late eighteenth/early nineteenth century Mount Terrace which is listed at grade II. The site was previously occupied by an earlier nineteenth century terrace which played an important role in the streetscene by extending the scale of northern façade of the Royal London Hospital westwards.
- 7.174 The site is currently occupied by a surface car park which creates a gap in the street frontage and increases the visual presence of the unattractive bulk of the Dental Hospital adjacent to Turner Street, which occupies the site of the former Alexandra Wing which formed part of the London hospital.
- 7.175 The surface car park is harmful to the character and appearance of the London Hospital Conservation Area, the setting of the Whitechapel Market Conservation Area to the north and the setting of the Grade II listed Mount Terrace. A development of a suitable scale and form on this site therefore has the potential to enhance the character and appearance of the Former Royal London Conservation Area and Whitechapel Market Conservation Area and enhance the setting of Mount Terrace and the wider setting of the listed Tower Hamlets Town Hall to the east of Plot A.
- 7.176 Development of the site offers the opportunity to (i) knit the listed Mount Terrace back into the surrounding urban fabric, (ii) improve the relationship of the west end of the listed Mount Terrace with New Road (and Myrdle Street CA) by means of a sympathetic development and (iii) form a coherent junction between Mount Terrace and Turner Street by the erection of a sympathetically scaled building at the eastern end of the terrace.
- 7.177 Although in parts the scale of the Plot A development is larger than the historic scale of development that would have been on this site, for the reasons set out earlier in this report it is considered that the scale of the proposal is appropriate in terms of its visual relationship with Whitechapel Road, Turner Street and New Road. The proposed development on this plot helps to bridge the gap between the London Hospital CA and the part of the Whitechapel Market CA to the west of New Road, thus helping to re-create a more coherent street scene. This is a very positive aspect of the application proposals as a whole.
- 7.178 Together with consideration of the beneficial effect of repairing the historic urban grain, the development of Plot A would enhance the Former London Hospital CA, enhance the setting of both the Whitechapel Market CA and Myrdle Street CA and enhance the setting of the Grade II listed Mount Terrace. In addition, the proposals for plot A would improve the setting with the Grade II listed former Royal London Hospital and listed properties at the corner of New Road and Whitechapel Road by repairing the streetscene with an appropriate scale to their immediate surrounds. Overall plot A is seen to provide benefit and enhancement to the heritage assets identified which includes the Royal London Hospital listed building, the Former

London Hospital Conservation Area and setting of listed properties at New Road/Whitechapel Road, Mount Terrace and nearby conservation areas.

### Plot B

7.179 Plot B contains the former Outpatients Department and the Outpatients Annexe (Plot B3), the Ambrose King Centre (Plot B2) and Boiler House (Plot B1). The Former Outpatients Building and Ambrose King Centre are located within the Former London Hospital CA.

#### *The Former Outpatients Building*

7.180 The former Outpatients Building is a non-designated heritage asset and a positive contributor to the Former London Hospital Conservation Area.

7.181 The exterior of the Outpatients Building is composed of three tall storeys in red brick with a glazed brown brick base. The upper floor and turrets incorporate bands of contrasting coloured brick. The building is robustly detailed, most of the fenestration appears to be original and the external elevations appear to be little changed.

7.182 The existing Outpatients Building is similar in scale and materiality to the Garrod Building situated across Turner Street. Both buildings reflect the historic importance of the Royal London Hospital as one of Britain's most important hospitals. Both buildings sit well together in CA views along Stepney Way and Turner Street and form an interesting group with the Good Samaritan Public House and the listed church of St Philip. The buildings are sympathetic elements in views from Fieldgate Street within the Myrdle Street CA where they provide a beneficial visual foreground to the great mass of the new multi-storey Royal London Hospital.

7.183 The Outpatients Building plays an important part in the wider setting of the Grade II\* listed former St Philip's Church.

7.184 The Outpatients Building is a highly significant CA building. The CA appraisal includes the building amongst those that make a positive contribution to the CA and notes that '*Although not statutorily listed, this building is integral to the significance of the conservation area due to its prominence, position in the group and handsome Edwardian elevations, which are still recognisable despite some later additions such as the large entrance canopy and external pipework. Although not statutorily listed, the former Outpatients Department is one of the principal historic hospital buildings that underpin the reason for the conservation area designation.*'

7.185 It forms one of the chief survivors of the historic Royal London Hospital complex (along with the Grade II listed former hospital and the adjacent Garrod Building) and it is evidence of the long history and historic importance of the hospital.

7.186 As proposed, the demolition of all but the south and east facades of the building would undoubtedly cause harm to the building itself and harm to the Former London Hospital Conservation Area.

7.187 The design of the additions to the partially retained facades has been subject to revision during the course of meetings at pre-application and application stage. However, the application is ultimately still proposing to introduce a significant amount of new floorspace on this site which can only feasibly be achieved by building upwards. This results in the architectural integrity of the retained parts of the host building being severely compromised by the very large and bulky new build elements of this proposal, those elements visually overpowering the partially retained facades.

7.188 In addition, harmful changes are proposed to the ground floor of the retained facades. The harmful changes include the loss of the ground floor window frames to Stepney Way including the particularly distinctive areas of glazing around the doors located at the foot of the stair towers, either side of the main entrance. The harmful changes also include the removal of the

two distinctive, single storey canted bay windows facing Turner Street which were designed to light surgeon's rooms located at the heart of the two suites of rooms which formed the surgical department. It is proposed to replace the bay windows and the narrow windows to either side of them with large areas of glazing incorporating sliding glass doors.

- 7.189 As noted in the consultation responses section of this report, Historic England object to the proposed development. A key aspect of their objection is the near total demolition of the historic building but for the south and east elevations where historic fenestration and glazing patterns to the ground floor are largely lost, as well as the scale of the proposed new structure behind these elevations and the way it unbalances the composition.

#### *Outpatients Annexe*

- 7.190 The building makes a distinguished and positive contribution to the setting of the Former London Hospital CA. The building also makes a positive contribution to the Myrdle Street CA which includes buildings on the west side of New Road, opposite the Annexe. The building is a non-designated heritage asset.
- 7.191 The building has suffered from lack of maintenance for some years and this detracts from its current appearance. However, it should be noted that Paragraph 202 of the NPPF (2023) states that 'Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.'
- 7.192 In heritage terms, the loss of this distinctive building would cause harm to the setting of the former London Hospital CA, especially with regard to the setting of the Former Outpatients Building. Historic England, who object to the application overall, consider that the distinctive Annexe building contributes positively to the setting of the CA and its loss to be regrettable.
- 7.193 Notwithstanding harm caused by loss of the Outpatients Annexe, the replacement building is considered to have a neutral impact on views along New Road with some slight harm to the views along Fieldgate Street/Stepney Way due to the impact of the proposal on the retained turrets of the Outpatients.

#### *The former Boiler House (Plot B2)*

- 7.194 The Boiler House is not located within a CA. At the time of the application the existing structures on the site included a large metal flue/chimney erected 'post-1973' (Heritage Statement) to replace a 1920's brick chimney. This has now been removed, which is beneficial as it caused harm to the setting of the Former London Hospital Conservation Area.
- 7.195 The site also includes a two-storey building with a raised central section which dates from the 1920's. Whilst this is considered to be of some merit, its removal and replacement with a suitably designed building has the potential to enhance the setting of the Former London Hospital Conservation Area, the Myrdle Street CA and the listed properties of Mount Terrace.

#### *The Ambrose King Centre (Plot B2)*

- 7.196 The Ambrose King Centre is located within the Former London Hospital Conservation Area. As amended, the proposal includes no changes to the existing Ambrose King Centre on Plot 2. The retention of the building is welcomed but the building would benefit from external renovations. This is particularly important in the context of the planned improvements to public realm across the site and new development that is proposed on other plots. Were improvements not carried out this would undermine the masterplanned approach to the proposed development.
- 7.197 The means by which such improvements could be secured has been raised with the applicant as a matter that could be dealt with via a S.106 legal agreement if permission were to be granted. The applicant team have however rejected this suggestion. Officers consider this, to a degree, will undermine the success of the scheme once it has been completed.

#### *Plot D1*

- 7.198 The proposed Building D1 is located within the Former London Hospital Conservation Area. The listed Tower Hamlets Town Hall stands to the north and the Garrod Building (considered to be non-designated heritage asset) stands to the west. The buildings which formerly stood on the site of the proposed Building D1 were demolished some years ago.
- 7.199 Building D1 would rise above Tower Hamlets Town Hall which is listed (as the 'Former London Hospital') at Grade II. The main (north) facade of the listed building faces Whitechapel Road. The hospital building was begun in 1751. The building was adapted and extended over the next two and half centuries until the institution moved to the new hospital to the south of the site. The main facade illustrates the evolution of the hospital. The basement and lower three floors of the main body of the building belong to the original 1751 building with early twentieth century additions above. The boldly projecting chapel was added to form a new centre piece in 1890. More recently the former hospital buildings were altered and extended to form the new Tower Hamlets Town Hall which opened in 2023.
- 7.200 LBTH Conservation Officers observe that it is difficult to over emphasise the importance of the axial view of the main façade of the Town Hall from the north side of Whitechapel Road (as seen in View 44, copy included in Appendix 2. The impressive chapel block is viewed behind the beautifully detailed Edward VII monument (listed at Grade II); the generous broad pediment of the former chapel reflecting that which featured on the 1751 building. Since it was added to the front of the hospital in the late nineteenth century, the former chapel has been the key feature of the public face of the building. The arches beneath the chapel formed the historic main entrance to the hospital and are now the main entrance to the new Town Hall. The former chapel block served as a visual symbol of the old London Hospital and it already plays the same role with regard to the new Town Hall, at the heart of civic life in Tower Hamlets.
- 7.201 In the proposed view across Whitechapel Road by the Edward VII monument elements of the new hospital tower are visible to the left of the central axis of the pediment but they are lower than the apex of the pediment with the tallest parts of the new hospital set further away from the listed Town Hall than would be the case with Building D1. As proposed, Building D1 would rise up to a greater height than the apex of the pediment. It would introduce a visually prominent element directly above the right hand side of the pediment which would be visually uncomfortable and would still serve to undermine the overall visual primacy of the pedimented central section of the building. The extent to which the existing tall Royal London Hospital block hinders the ability of the viewer to appreciate the architectural form of the chapel as part of the grand former hospital facade is more limited than is the case with the application currently under consideration.
- 7.202 View 41 ('Whitechapel Road by number 291', copy included in Appendix 2) shows a view of almost all the main facade of the listed former hospital. As existing, the new hospital intrudes on the view at the extreme right but it is still possible to appreciate much of the rich historic skyline of the former hospital building unencumbered by development behind.
- 7.203 It is noted that the extension added to the former hospital when it was converted to the Town Hall was purposely kept low to minimise its impact on the historic skyline and setting of the listed hospital. In the proposed view, despite some reduction in height, remodelling and changes in tonality, the Plot D1 building would rise up between the new hospital and the chapel of the former hospital in a more prominent location (closer to the most historic parts of the hospital) than the existing hospital tower. The proposed building on this Plot could easily be perceived by the viewer as being physically connected to the listed former hospital. In this view Block D1 is a visually intrusive element which hinders the ability of the viewer to fully appreciate the full impact and extent of the grand listed facade.
- 7.204 In View 45 ('Whitechapel Road, junction with Court Street', copy included in Appendix 2), the Plot D1 building is still very prominent, rising above the listed Town Hall.

#### Other Views



7.205 The various buildings within the proposal have an impact on numerous views of heritage assets including the following:

- The proposed Building D1 has a harmful impact on the setting of other heritage assets and conservation area views including in View 63 (Philpot Street / School of Community and Health Sciences, copy included in Appendix 2) where it has an overbearing impact on the early Victorian listed terraces of Philpott Street and Views 64 (Green Spine, south of Newark Street) and 65 (Newark Street, by Floyer Building', copy included in Appendix 2) where amendments haven't addressed the Council's concerns with regard to the overbearing relationship of Building D1 on the Grade II\* listed Church of St Augustine with St Philip's as it brings the huge, intrusive scale of the new Royal London Hospital much closer to the listed church.
- In View 65, the upper parts of the Grade II\* listed former St Augustine with St Philip's Church are currently viewed against the sky, unconstrained by other development in the background. As proposed, Building C would rise to the left of the church and Building B3 would rise to the right. The two buildings would reduce the visual impact if the very impressive silhouette of the church and thereby harm the ability of the viewer to fully appreciate its special architectural and historic interest.
- In View 35 ('Turner Street/Ashfield Street, copy included in Appendix 2) In the existing view, the Royal London Hospital is off to the right allowing the scale and form of the CA buildings on Turner Street to be appreciated. In the proposed view, Block D1 would bring the huge scale of the existing Royal London Hospital tower much closer to Turner Street and visually crush the smaller conservation area buildings, imposing itself on the former Church of St Augustine with St Philip's.

#### Archaeology

7.206 The application site sits within an area of rich archaeological resource. It is within an Archaeological Priority Area (Mile End). Archaeological significance of the site focuses on the possible Civil War fort location in or near to the site, the development and dismantling of the Whitechapel Mount, and evidence of human burials from the early hospital's various cemeteries, as well as contributions to the understanding of the medieval and later development along the high road.

7.207 The impact of the development on archaeological interests has been the subject of substantial discussion between the applicant and the Greater London Archaeological Advisory Service (GLAAS) during the course of the application. Consultation between the applicant and GLAAS resulted in updated archaeological information being provided within the 'addendum submission'. This includes a foundation design having been provided for the proposed building on Plot A.

7.208 In response to the second round of consultation following the addendum submission, GLAAS confirmed that having reviewed the updated information they now have no objections to the proposed development. This is subject to a condition being attached to the permission, if granted, requiring an archaeological Written Scheme of Investigation to be approved. This would cover a programme and methodology of site investigation, recording, possible delivery of related public benefits and post investigation assessment, analysis, publication and dissemination.

7.209 The conclusion of GLAAS is consistent with the outcome of the review by Temple. Accordingly, if permission is granted Officers recommend that the condition recommended by GLAAS is attached to the decision and that the drawings in relation to Plot A foundation design form part of the permission. This will ensure that mitigation is in place to protect archaeological interests.

#### *Heritage conclusion*

7.210 A large number of views have been produced in order that the effects of the proposal on above ground assets can be understood and assessed. Those referred to above have been highlighted to illustrate some of the effects of the proposed development.

7.211 Whilst matters relating to below ground heritage have been satisfactorily resolved through the course of the application, the above assessment highlights that from the perspective of above ground heritage whilst the proposed development would result in some benefits it would also result in harm. This includes harm to the setting of the former Royal London Hospital building (Tower Hamlets Town Hall) and St. Augustine with St. Philip's Church, harm arising from the extensive demolition that is proposed to the Outpatients Building and the total demolition of the Outpatients Annexe, and harm to the character and appearance of the Former London Hospital Conservation Area. Historic England, who object to this proposal, judged the harm to the London Hospital Conservation Area to be in the middle range of less than substantial and harm to the significance of the former Whitechapel Hospital through changes to its setting as being in the lower half of the less than substantial harm range.

7.212 It will therefore be necessary to weigh the identified harm against the public benefits associated with the proposed development. This is addressed later in this report under 'Planning Balance'.

### **Amenity**

7.213 Local Plan Policy D.DH8 requires that development protects and where possible enhances or increases the extent of the amenity of new buildings and their occupants as well as the amenity of the surrounding public realm.

7.214 The Policy states that development must:

- a. maintain good levels of privacy and avoiding an unreasonable level of overlooking or unacceptable increase in the sense of enclosure;
- b. ensure new and existing habitable rooms have an acceptable outlook;
- c. ensure adequate levels of daylight and sunlight for new residential developments, including amenity spaces within the development;
- d. not result in an unacceptable material deterioration of the sunlight and daylight conditions of surrounding development and not resulting in an unacceptable level of overshadowing to surrounding open space and private outdoor space; and
- e. not create unacceptable levels of artificial light, odour, noise, fume or dust pollution during the construction and life of the development.

### **Daylight, sunlight and overshadowing**

7.215 The explanation text to Policy D.DH8 sets out that a sunlight and daylight assessment must accompany all major planning applications and that this should follow the methodology set out in the most recent version of Building Research Establishment's (BRE) 'Site layout planning for daylight and sunlight' guidance and the British Standard Code of Practice for daylighting.

7.216 In this respect, the planning application has been accompanied by a Daylight, Sunlight and Overshadowing Report ('the Report') prepared by GIA Chartered Surveyors. The Report was updated in autumn 2023 when the application 'addendum submission' was made ('the Addendum Report'). Both the Report and the Addendum Report have been prepared against the methodologies set out in the 2011 version of the BRE document 'Site layout planning for daylight and sunlight'. Whilst the Local Plan states that assessments should follow the methodology in the most recent edition of the BRE guidance, it would be unreasonable to change the document against which the proposal is being assessed part way through the determination period. In addition, it is noted that the updated 2022 edition of the guidelines do not change the way in which impacts to neighbours are assessed.

7.217 In addition to the Report and Addendum Report referred to above, Chapter 12 of the Environmental Statement has undertaken a review of environmental effects associated with daylight, sunlight, overshadowing, solar glare and light pollution. An addendum to the originally submitted ES was provided at the time of the addendum submission. Where Chapter

12 is concerned this updates the review of environmental effects to take into account any changes arising from the amendments to the application since it was originally submitted. The applicant has also submitted an Internal Overshadowing Assessment to examine the effect of the proposed development on publicly accessible open spaces within the site.

- 7.218 Where daylight and sunlight within buildings is concerned, the documents have made an assessment of the proposal against the Vertical Sky Component (VSC), No Sky Line (NSL) and Annual Probable Sunlight Hours (APSH) measures.
- 7.219 The VSC requires a calculation to be made of the reduction in total amount of skylight at the centre of each main window. If the result of the VSC calculation is greater than 27% then enough daylight should still be reaching the window of the existing building. The guidelines advise that any reduction below this level should be kept to a minimum. The guidelines go on to state that if the VSC with the new development in place is both less than 27% and less than 0.8 times its former value, then occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy and electric lighting will be needed more of the time.
- 7.220 The NSL calculation can be used where room layouts are known to assist in understanding the impact of daylight distribution in the existing buildings. Areas beyond the no sky line, since they receive no direct daylight usually look dark and gloomy compared to the rest of the room, no matter how bright it is outside. The guidelines advise that if, following construction of the new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 times its former value this will be noticeable to the occupants, and the room will appear poorly lit.
- 7.221 In relation to the APSH measure, 'probable sunlight hours' means the total number of hours in the year that the sun is expected to shine on unobstructed ground. The guidelines recommend that interiors where occupants expect sunlight should receive at least one quarter (25%) of APSH and between 21 September and 21 March at least 5% of APSH ('winter probable sunlight hours' – WPSH).
- 7.222 The following properties surrounding the site have been identified as sensitive in relation to daylight and sunlight:
- 22-34 Mount Terrace (residential)
  - 26-36 (evens), 40 and 42 Newark Street (residential)
  - 57-69 Philpot Street (odds) (residential)
  - 1-21 Gwynne House (residential)
  - 77-83 (odds), 87-97(odds), 103-107, 117 and 121 (Flats 1-24) New Road (residential)
  - 135 New Road – 142 Whitechapel Road (residential)
  - 136, 199, 205, 211-213, 215, 217, 219, 223-225, 227-229, 237-239 Whitechapel Road (residential)
  - 87 Turner Street (residential)
  - 105-107 Fieldgate Street (residential)
  - 12 and 13 and 23-28 Fieldgate Mansions (Romford Street) (residential)
  - Royal London Hospital (Healthcare)
  - Floyer House (Student accommodation)
  - 36A-38 Newark Street (Hotel)
- 7.223 In terms of overshadowing of spaces outside of the application site, this has been considered in relation to the private rear gardens of residential properties at 22-34 Mount Terrace, the private courtyard and roof terrace at 1- 21 Gwynne House and the public amenity space at London Square.
- 7.224 With regard to internal overshadowing (i.e. overshadowing of open space within the application site) the submitted assessment has considered effects on the following spaces:
- The proposed 'Turner Yard' (this is the open space on the line of former Pasteur Street).
  - The northern section of Turner Street between Whitechapel Road and Mount Terrace (referred to by the DSO consultant as 'Turner Street North')

- Part of Turner Street to the east of the former outpatients department building. This has been referred to by the DSO consultant as 'Turner Street South'.
- The new public space east of St. Philip with St. Augustine Church St. Philip's Place/west of Royal London Hospital/south of Stepney Way/north of Newark Street. This is referred to by the DSO consultant as 'St. Philip's Place'
- The new route between the Royal London Hospital building and the proposed Plot D1 building on the site, connecting Stepney Way and London Square. This has been referred to by the DSO consultant as 'Hospital Walk'.

7.225 The BRE guidance recommends that at least half of amenity areas (gardens and open spaces) should received at least two hours of sunlight on 21 March.

7.226 In relation to interpretation of the results of the development against the BRE guidelines, the magnitude of effects have been categorised as follows:

Effect satisfies the BRE guidelines	Effect does not satisfy the BRE guidelines		
		0.79 to 0.70 times former value i.e. 20.01% to 29.99% reduction	0.69 to 0.60 times former value i.e. 30.01% to 39.99% reduction
	Low magnitude of change	Medium magnitude of change	High magnitude of change

Effect on neighbouring properties – daylight

*22 – 34 Mount Terrace*

7.227 These three-storey terrace houses are not located within the application site but are enclosed by it on all sides. To the south of the houses on the opposite side of Mount Terrace are Plots B1, B2 and B3. Plot A wraps around them to the north, east and west. These houses currently benefit from an open outlook to the north over a former car park between them and Whitechapel Road. Land to the east and west is also currently open. The fronts of house numbers 22-27 face onto the three storey plus basement Ambrose King Building. Numbers 28-30 face onto the collection of buildings that served as the hospital boiler house. These are single storey except for a two storey building set into the site away from Mount Terrace, adjacent to the Ambrose King Building. Numbers 28-30 therefore currently benefit from a predominantly open outlook to the south.

7.228 For the Mount Terrace properties 133 windows were tested against the VSC measure. Of those tested:

- 30 meet the BRE criteria (negligible change)
- 25 would experience a 20-20.9% reduction (low magnitude of change)
- 39 would experience a 30-39.9% reduction (medium magnitude of change)
- 39 would experience a greater than 40% reduction (high magnitude of change)

7.229 In terms of the NSL measure, 96 rooms were assessed. The results were:

- 38 rooms would meet the criteria of 0.8 times former value (negligible change)
- 11 would experience a 20-20.9% reduction (low magnitude of change)
- 7 would experience a 30-39.9% reduction (medium magnitude of change)
- 40 would experience a greater than 40% reduction (high magnitude of change)

7.230 The fact that these properties face on to open land to the rear and some enjoy a relatively open aspect to the front means that the impact on these properties appears disproportionately great. In addition, the open aspect to the side of the end houses (numbers 22 and 34) mean that these properties experience some of the greatest effect For example a first floor bedroom at umber 22 would have its VSC reduced from 15.4% to 4% with NSL reducing from 97.1% to 11.6% and at 34 Mount Terrace the VSC to a basement kitchen would reduce from 10.2% to

5.3% with the NSL reducing from 82.4% to 14.5%.. Having regard to the above, it is concluded that the proposed development will result in noticeable changes to the daylight that is currently experienced at the Mount Terrace properties, but in large part this is due to the existing openness of the site.

*26-36 (evens), 40 and 42 Newark Street (residential)*

7.231 For these properties 54 windows were tested against the VSC measure. Of those tested:

- 35 would meet the BRE criteria
- 8 would experience a 20-20.9% reduction (low magnitude of change)
- 11 would experience a 30-39.9% reduction (medium magnitude of change)

7.232 In terms of the NSL measure, 41 rooms were assessed. The results were:

- 26 rooms would meet the criteria of 0.8 times former value (negligible change)
- 7 would experience a 20-20.9% reduction (low magnitude of change)
- 6 would experience a 30-39.9% reduction (medium magnitude of change)
- 2 would experience a greater than 40% reduction (high magnitude of change)

Of these properties, numbers 36, 40 and 42 Newark Street would be the properties that do not meet the BRE criteria. Number 36 has 15 windows that do not meet the VSC criteria and 12 windows that do not meet the NSL criteria. However, number 36 is a hotel where there would be less expectation for daylight. Where the houses at numbers 40 and 42 are concerned none of the effects would be no greater than a medium magnitude for change

*57-69 Philpot Street (odds) (residential)*

7.233 These properties satisfy the BRE guidelines in terms of daylight.

*1-21 Gwynne House (residential)*

7.234 This property is a five storey block of flats located to the east of Plot C. It has windows/rooms to the rear of the building (west elevation) that face directly onto the site of Plot C (currently occupied by the former dental hospital) and windows on the front facing east towards Plot D1.

7.235 Of the 84 windows that were tested against the VSC measure:

- 52 meet the BRE criteria (negligible change)
- 11 would experience a 20-20.9% reduction (low magnitude of change)
- 17 would experience a 30-39.9% reduction (medium magnitude of change)
- 4 would experience a greater than 40% reduction (high magnitude of change)

7.236 In terms of the NSL measure, 84 rooms were assessed. The results were:

- 58 rooms would meet the criteria of 0.8 times former value
- 6 would experience a 20-20.9% reduction (low magnitude of change)
- 7 would experience a 30-39.9% reduction (medium magnitude of change)
- 13 would experience a greater than 40% reduction (high magnitude of change)

7.237 Due to the proximity of Gwynne House to Plot C and the distance between Gwynne House and Plot D1, where effects are experienced these are predominantly to the rear elevation. It is also noted that building as a whole has a unique architectural form with the front elevation in particular having overhanging walkways which restrict the ability of daylight to penetrate in the existing scenario.

7.238 Having regard to the above, it is concluded that the proposed development will result in noticeable changes to the daylight that is currently experienced at Gwynne House.

*77-83 (odds), 87-97(odds), 103-107 New Road (hotel) and 117 New Road*

7.239 These residential properties are located above commercial premises on New Road in buildings between three and four storeys in height. The buildings face east across New Road onto Plots B2, B3 and C.

7.240 Of the 138 windows that were tested against the VSC measure:

- 62 meet the BRE criteria (negligible change)
- 50 would experience a 20-20.9% reduction (low magnitude of change)
- 14 would experience a 30-39.9% reduction (medium magnitude of change)
- 12 would experience a greater than 40% reduction (high magnitude of change)

7.241 In terms of the NSL measure, 103 rooms were assessed. The results were:

- 57 rooms would meet the criteria of 0.8 times former value (negligible change)
- 16 would experience a 20-20.9% reduction (low magnitude of change)
- 11 would experience a 30-39.9% reduction (medium magnitude of change)
- 19 would experience a greater than 40% reduction (high magnitude of change)

Having regard to the above, it is concluded that the proposed development will result in noticeable changes to the daylight that is currently experienced at the above referenced New Road residential properties. It is noted some of the windows and rooms assessed are a hotel development and therefore the use of this property is more transient in nature than the residential uses.

*121 (Flats 1-24) New Road (residential)*

7.242 These properties satisfy the BRE guidelines in terms of daylight.

*135 New Road – 142 Whitechapel Road (residential)*

7.243 These residential properties are located above commercial premises on Whitechapel Road, next to the junction with New Road. Plot A is located east of these properties on the opposite side of New Road.

7.244 Of the 10 windows that were tested against the VSC measure all 10 would meet the BRE criteria (negligible change).

7.245 In terms of the NSL measure, 8 rooms were assessed and all 8 would meet the criteria of 0.8 times former value (negligible change).

7.246 Having regard to the above, it is concluded that the proposed development will not result in noticeable changes to the daylight that is currently experienced at these residential properties.

*136, 199 205, 211-213, 215, 217, 219, 223-225, 227-229, 237-239 Whitechapel Road (residential)*

7.247 These residential properties are located above commercial premises on Whitechapel Road, next to the junction with New Road with Plot A being the closest development plot to them.

7.248 Of the 69 windows that were tested against the VSC measure all 69 would meet the BRE criteria (negligible change).

7.249 In terms of the NSL measure, 53 rooms were assessed and all 53 would meet the criteria of 0.8 times former value (negligible change).

7.250 Having regard to the above, it is concluded that the proposed development will not result in noticeable changes to the daylight that is currently experienced at these residential properties.

*87 Turner Street*

7.251 This is the building that houses the Good Samaritan public house, located to the south of Plot B3 (the former outpatients department) and to the east of Plot C (the site of the former dental hospital). The building is two storeys in height and has accommodation in the roof space served by dormer windows. A total of 14 windows serving the habitable rooms at first and second floors have been assessed.

7.252 Of the windows that were tested against the VSC measure:

- 7 meet the BRE criteria (negligible change)
- 4 would experience a 20-20.9% reduction (low magnitude of change)
- 2 would experience a 30-39.9% reduction (medium magnitude of change)
- 1 would experience a greater than 40% reduction (high magnitude of change)

7.253 In terms of the NSL measure, 7 rooms were assessed. The results were:

- 4 rooms would meet the criteria of 0.8 times former value (negligible change)
- 2 would experience a 20-20.9% reduction (low magnitude of change)
- 0 would experience a 30-39.9% reduction (medium magnitude of change)
- 1 would experience a greater than 40% reduction (High magnitude of change)

7.254 It is noted that at first floor, whilst there are some low impacts in VSC, the retained NSL's are compliant with BRE. The third and fourth floor levels would notice the highest impact in terms of loss of VSC and NSL given this is where the medium to high magnitude of change in both VSC and NSL is experienced.

7.255 Having regard to the above, it is concluded that the proposed development will result in noticeable changes to the daylight that is currently experienced at the uppermost floor levels at the residential properties above the Good Samaritan public house.

*105-107 Fieldgate Street (residential)*

7.256 The residential units at these addresses are located above commercial premises on Fieldgate Street. 105-107 Fieldgate Street are located towards the eastern end of Fieldgate Street, close to the junction with New Road.

7.257 A total of 9 windows serving the habitable rooms at first and second floors have been assessed.

7.258 Of the windows that were tested against the VSC measure all 9 windows meet the meet the BRE criteria.

7.259 In terms of the NSL measure, 8 rooms were assessed. All 8 rooms would meet the criteria of 0.8 times former value.

7.260 Having regard to the above, it is concluded that the proposed development will not result in noticeable changes to the daylight that is currently experienced at these residential properties.

*12 and 13 and 23-28 Fieldgate Mansions (Romford Street) (residential)*

7.261 These four storey residential properties are located on Romford Street, to the west of the application site. Those which are broadly west of the proposed Plot C building (on the site of the former dental hospital) have been assessed.

7.262 A total of 87 windows serving habitable rooms have been assessed. Of the windows that were tested against the VSC measure all meet the BRE criteria.

7.263 In terms of the NSL measure, 85 rooms were assessed. The results were:

- 76 rooms would meet the criteria of 0.8 times former value (negligible change)
- 6 would experience a 20-20.9% reduction (low magnitude of change)
- 3 would experience a 30-39.9% reduction (medium magnitude of change)

- 0 would experience a greater than 40% reduction (high magnitude of change)

7.264 Having regard to the above, it is concluded that the proposed development will result in noticeable changes to the daylight that is currently experienced at these residential properties.

*Royal London Hospital (Healthcare)*

7.265 Whilst the majority of impacts have been assessed in relation to residential properties, the BRE guidelines also establish that they may be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight. Hospitals are one such example of this. The applicant has therefore modelled the effects of the proposed development on the Royal London Hospital.

7.266 A total of 194 windows serving relevant rooms have been assessed.

7.267 Of the windows that were tested against the VSC measure:

- 110 meet the BRE criteria (negligible change)
- 9 would experience a 20-20.9% reduction (low magnitude of change)
- 12 would experience a 30-39.9% reduction (medium magnitude of change)
- 63 would experience a greater than 40% reduction (high magnitude of change)

7.268 In terms of the NSL measure, 114 rooms were assessed. The results were:

- 84 rooms would meet the criteria of 0.8 times former value (negligible change)
- 4 would experience a 20-20.9% reduction (low magnitude of change)
- 3 would experience a 30-39.9% reduction (medium magnitude of change)
- 23 would experience a greater than 40% reduction (high magnitude of change)

7.269 The impacts on the hospital building are largely as a result of the development of plot D1 from a car park to a tall building. There is limited separation distance between the D1 building and the hospital and the massing obstructs daylight at the upper floor levels of the building.

7.270 Having regard to the above, it is concluded that the proposed development will result in noticeable changes to the daylight that is currently experienced within the Royal London Hospital.

*Floyer House (Student accommodation)*

7.271 Floyer House is a five storey student hall of residence located to the south of Newark Street.

7.272 A total of 90 windows serving habitable rooms have been assessed.

7.273 Of the windows that were tested against the VSC measure:

- 69 meet the BRE criteria (negligible change)
- 12 would experience a 20-20.9% reduction (low magnitude of change)
- 9 would experience a 30-39.9% reduction (medium magnitude of change)
- 0 would experience a greater than 40% reduction (high magnitude of change)

7.274 In terms of the NSL measure, 70 rooms were assessed. The results were:

- 58 rooms would meet the criteria of 0.8 times former value (negligible change)
- 3 would experience a 20-20.9% reduction (low magnitude of change)
- 3 would experience a 30-39.9% reduction (medium magnitude of change)
- 6 would experience a greater than 40% reduction (high magnitude of change)

7.275 It is noted that the building is used as student accommodation and therefore slightly more transitory in nature. Having regard to the above, it is concluded that the proposed development will result in some noticeable changes to the daylight that is currently experienced within those parts of Floyer House that have been assessed.



*36A-38 Newark Street (Hotel)*

7.276 Similar to hospitals, hotels are cited in the BRE guidelines as a use where occupants have a reasonable expectation of daylight.

7.277 A total of 16 windows serving habitable rooms have therefore been assessed.

7.278 Of the windows that were tested against the VSC measure:

- 3 meet the BRE criteria (negligible change)
- 7 would experience a 20-20.9% reduction (low magnitude of change)
- 4 would experience a 30-39.9% reduction (medium magnitude of change)
- 2 would experience a greater than 40% reduction (high magnitude of change)

7.279 In terms of the NSL measure, 8 rooms were assessed. The results were:

- 2 rooms would meet the criteria of 0.8 times former value (negligible change)
- 4 would experience a 20-20.9% reduction (low magnitude of change)
- 1 would experience a 30-39.9% reduction (medium magnitude of change)
- 1 would experience a greater than 40% reduction (high magnitude of change)

7.280 It is noted that 2 windows facing a low magnitude of change in VSC serve a winter garden; however, the NSL is compliant. In addition, there is an overhang at first floor level which means the two windows facing a high magnitude of change have existing external features which limit their ability to receive light in the existing scenario. The resultant NSL into the room is of a low magnitude. In addition, officers note that the use is a hotel and the transient nature of those occupiers. Having regard to the above, it is concluded that the proposed development will result in some noticeable changes to the daylight that is currently experienced within this building.

*Effect on neighbouring properties – sunlight*

*136, 138-140, 142, 199, 205, 211-213, 215, 217, 219, 223-225, 227-229, and 237-239 Whitechapel Road, 97, 103-107, 121 (Flats 1-24) and 135 New Road, 26 Newark Street, 22 Mount Terrace, 105-107 Fieldgate Street, 36A -38 Newark Street, 67 and 69 Philpot Street, Floyer House*

7.281 These properties all meet the BRE criteria for annual probable sunlight hours (APSH) and the winter probable sunlight hours (WPSH).

*1-20 Gwynne House*

7.282 A total of 43 windows in Gwynne House were assessed to establish the impact of the proposed development against the APSH and WPSH sunlight measures.

7.283 Of the windows that were tested 40 meet the BRE criteria. For the 3 windows which do not meet the criteria transgression were against the APSH measure as follows:

- 2 would experience a 30-39.9% reduction (medium magnitude of change)
- 1 would experience a greater than 40% reduction (high magnitude of change)

7.284 It is noted that the affected windows would meet the criteria in relation to WPSH and that the affected windows would retain 24% APSH – marginally below the 25% stated in the guidance.

*23-34 Mount Terrace*

7.285 A total of 81 windows were assessed at 22-34 to establish the impact of the proposed development against the APSH and WPSH sunlight measures.

7.286 Of the windows that were tested 40 meet the BRE criteria. For the 41 windows which do not meet the criteria:

- Against the APSH measure:

- 2 would experience a 30-39.9% reduction (medium magnitude of change)
- 1 would experience a greater than 40% reduction (high magnitude of change)
- Against the WPSH measure
  - 38 would experience a greater than 40% reduction (high magnitude of change)

7.287 As noted earlier in this report, the BRE guidelines are that a window is to receive more than one quarter of APSH *including* at least 5% of APSH in the winter months for the room to be considered to still receive enough sunlight.

7.288 Given the transgressions highlighted above, it is concluded that for the above referenced Mount Terrace properties there would be a noticeable loss of sunlight. For the majority of the houses this would be most noticeable during the winter months.

#### *87 Turner Street*

7.289 A total of 4 windows were assessed at this residential property to establish the impact of the proposed development against the APSH and WPSH sunlight measures.

7.290 Of the windows that were tested 1 meets the BRE criteria. For the 3 windows which do not meet the criteria:

- Against the APSH measure:
  - 1 would experience a 20-20.9% reduction (low magnitude of change)
  - 2 would experience a greater than 40% reduction (high magnitude of change)
- Against the WPSH measure:
  - 2 would experience a greater than 40% reduction (high magnitude of change)

7.291 This property would therefore experience a noticeable loss of sunlight throughout the year.

#### *Royal London Hospital*

7.292 A total of 89 windows in the Hospital were assessed to establish the impact of the proposed development against the APSH and WPSH sunlight measures.

7.293 Of the windows that were tested 53 meet the BRE criteria. For the 36 windows which do not meet the criteria:

- Against the APSH measure:
  - 4 would experience a 20-20.9% reduction (low magnitude of change)
  - 4 would experience a 30-39.9% reduction (medium magnitude of change)
  - 28 would experience a greater than 40% reduction (high magnitude of change)
- Against the WPSH measure:
  - 15 would experience a greater than 40% reduction (high magnitude of change)

7.294 The Royal London Hospital would therefore experience a noticeable loss of sunlight throughout the year.

#### *Effect on outdoor amenity space – private*

##### *22-32 Mount Terrace*

7.295 On 21 March the rear gardens, located to the north of these houses, are cast in shadow in the existing baseline condition. With the exception of one of the gardens, the proposed development would result in no alteration in the percentage of the area which would see at least two hours of direct sunlight on 21 March.

##### *33 Mount Terrace*

7.296 The back garden to this property currently experiences 6% of the total area receiving at least two hours of sunlight on 21 March. Once the proposed development is completed, 100% of this area would be lost meaning that none of the garden would see at least two hours of direct sunlight on 21 March.

### *34 Mount Terrace*

- 7.297 The back garden to this property currently experiences 26% of the total area receiving at least two hours of sunlight on 21 March. Once the proposed development is completed, 100% of this area would be lost meaning that none of the garden would see at least two hours of direct sunlight on 21 March.

### *Gwynne House courtyard*

- 7.298 The courtyard to the rear of Gwynne House currently sees 9% of the area receiving at least two hours of direct sunlight on 21 March. Once the proposed development is completed, 67% of the total area of the courtyard would receive at least two hours of direct sunlight on 21 March.

### *Effect on outdoor amenity space – publicly accessible*

#### *London Square*

- 7.299 In the existing baseline condition, 39% area of London Square would achieve at least two hours of direct sunlight on the 21 March – already below the BRE guidance that half of an open space should receive two hours sun on ground on 21 March. The scale of the Royal London Hospital to the south of London Square is the main reason for the impact on the existing level of sunlight into London Square.
- 7.300 When the proposed development is complete, London Square would experience a 100% reduction in the total area which would see at least two hours of direct sunlight on 21 March.

#### *Turner Street north*

- 7.301 This space is the northern section of Turner Street between Whitechapel Road and Mount Terrace.
- 7.302 The submitted Internal Overshadowing Assessment has identified that 34% of this area would receive more than two hours of direct sunlight. Whilst it does not meet the BRE guidelines of half of the area achieving more than two hours of sun on ground, the Assessment notes that 12 days later on 2 April this area would comply with the BRE guidelines. This additional level of analysis is useful to understand the degree to which this space does not comply with the BRE guidelines.

#### *Turner Street South*

- 7.303 This space is the part of Turner Street to the east of the former outpatients department building and to the west of the QMUL Garrod Building.
- 7.304 The submitted Internal Overshadowing Assessment has identified that 97% of this area would receive more than two hours of direct sunlight on 21 March. This area therefore complies with the BRE guidelines. Further, the Assessment identifies that this area would exceed the BRE guideline minima and would see three hours sun on ground on 21 March.

#### *Plot C pocket garden*

- 7.305 This is the proposed space between Gwynne House and Plot C.
- 7.306 The submitted Internal Overshadowing Assessment has identified that over 97% of this area would receive more than two hours of direct sunlight on 21 March. This area therefore complies with the BRE guidelines. Similar to Plot C pocket garden, the Assessment identifies that this area would exceed the BRE guideline minima and would see three hours sun on ground on 21 March.

#### *St. Philip's Place*

- 7.307 This is the new public space east of St. Philip with St. Augustine Church St. Philip's Place/west of Royal London Hospital/south of Stepney Way/north of Newark Street.

- 7.308 The submitted Internal Overshadowing Assessment has identified that 96% of this area would receive more than two hours of direct sunlight on 21 March. This area therefore complies with the BRE guidelines.
- 7.309 The Assessment goes on to identify that St. Philip's Place is the main piece of public realm within the development and, at in excess of six hours of direct sunlight within the majority of the area on 21 March, considerably exceeds the BRE guideline minima.

#### *Turner Yard*

- 7.310 This is the open space on the line of former Pasteur Street to the north of Plot B3 on the site of the former Outpatients Department / Outpatients Annexe.
- 7.311 The submitted Internal Overshadowing Assessment shows that none of this space would meet the BRE guidelines two hours sun on ground on 21 March. The Assessment states that 'due to Turner Yard being a narrow pedestrian street running east/west, it is to be expected that in an urban context, lower sun access would be seen at ground level.

#### *Hospital Walk*

- 7.313 This space is the new route between the Royal London Hospital building and the proposed Plot D1 building on the site, connecting Stepney Way and London Square. It forms the northern section of the Green Spine.
- 7.314 The submitted Internal Overshadowing Assessment shows that 19% of this space would meet the BRE guidelines two hours sun on ground on 21 March. The part of the space that would comply with the BRE guidelines is at the southern end closest to Stepney Way.
- 7.315 The Assessment states that 'owing to the scale of massing surrounding Hospital Walk, and the relative distance between the two buildings either side, lower sunlight access is seen at ground level'.

#### Light pollution

- 7.316 The Environmental Statement has considered the effects of light pollution on sensitive receptors around the site. All of the buildings assessed would, both before and after 23:00 hours, meet the Institute of Lighting Professionals meaning that direct, long term effects would be negligible.
- 7.317 Notwithstanding, in the interests of neighbourliness it is recommended that if permission is granted a condition is attached to the decision requiring prior to occupation of each plot a scheme is approved in relation to the control and operation of the proposed lighting within the buildings during periods of limited or non-occupation.

#### Solar glare

- 7.318 An assessment of solar glare has been submitted with the application which has identified one adverse effect to view point N1 (Vallance Road). There is the potential for some glazing within the proposed development to cause glare to the detriment of road users. In accordance with the recommendation of LBTH's appointed competent expert, Temple, it is recommended that if permission is granted a condition is attached to the decision requiring the installation of low reflectance glass for the windows causing the solar reflection to point N1.

#### Daylight, sunlight and overshadowing conclusion

- 7.319 The scale and complexity of the application site means that the proposed development results in multiple and widely varying impacts.
- 7.320 The site benefits from not being surrounded by a particularly large number of residential properties. However, as can be understood from the above assessment the impacts on some of these properties from the proposed development will be very noticeable. In terms of overall

compliance with the BRE criteria, this is 64.6% against the VSC measure, 73.4% for the NSL measure and 83.3% for APSH. The effect of non-compliance with the BRE guidelines will be particularly experienced by the residents of Mount Terrace, Gwynne House and the residential properties on the upper floors of buildings on New Road opposite Plot C who will experience major effects in relation to daylight.

- 7.321 In terms of sunlight to residential properties that have been assessed the impacts would be greatest to Mount Terrace residents.
- 7.322 With regard to sunlight to open spaces within and adjacent to the site the effect of the development is widely varied depending which part of the site is being considered. Officers consider the level of overshadowing to London Square to be an extremely negative consequence of the proposed development. Similarly, the level of sun on ground on 'Hospital Walk' is very poor and will undoubtedly undermine the success of this space in the terms which were envisaged by the relevant policies and guidance pertaining to the Green Spine. Notwithstanding these particularly negative and undesirable aspects of the proposal, Officers note that the new public square adjacent to St. Augustine with St Philip's Church would receive extremely good levels of sunlight. In addition, as noted earlier in this report spaces such as that outside Plot C to the rear of Gwynne House would receive very good levels of sunlight. The siting of Plot C and delivery of this space would also result in beneficial effects for the residents of Gwynne House.
- 7.323 The identified negative effects of the proposed development on some residential properties and on some of the gardens and open spaces within and adjacent the site are regrettable. However, the negative consequences that have been identified must be balanced against the fact that the application site forms part of a Local Plan Site Allocation where a significant quantum of development is expected to come forward. Given the existence of some cleared plots on the site and the relatively low scale of other parts of the site any redevelopment which seeks to optimise the potential of the site will always result in negative effects.
- 7.324 Whilst negative daylight, sunlight and overshadowing effects would arise as a result of this development, this needs to be weighed against the benefits of the proposal. This is discussed later in this report under 'Planning Balance'.

#### Privacy, outlook and enclosure

- 7.325 In terms of privacy, the standards set out in the Local Plan relate to effects that are experienced between habitable rooms. Given there is no residential proposed within this development, the privacy considerations set out in 1.a of Policy D.DH8 do not apply.
- 7.326 Notwithstanding Officers note that there are a number of external private amenity areas proposed across the various plots which have the potential to create overlooking or perception of overlooking of residential properties surrounding the site. In the event that permission is granted it is recommended that conditions are attached to the decision requiring installation of physical measures to ensure there is no unreasonable impact on neighbouring residential properties from the high level external amenity areas. This applies to Plot A and its relationship to Mount Terrace and Plot C and its relationship to Gwynne House.
- 7.327 With regard to outlook and enclosure, the supporting text to Policy D.DH8 states that 'Applicants or developers will need to give careful consideration to the layout and massing of buildings to ensure that the new development does not result in an increased sense of enclosure and loss of outlook'.
- 7.328 The principal possible effects on outlook and enclosure would arise from:
- Plot A in relation to Mount Terrace
  - Plot B3 in relation to buildings on the opposite side of New Road
  - Plot C in relation to Gwynne House
- 7.329 In relation to Plot A, as noted earlier in this report the Plot is currently vacant. Even a modest scale of development on this Plot will be very noticeable to residents of this terrace, who are

likely to have become accustomed to an open and unrestricted outlook to both the rear and the sides.

- 7.330 Amendments to the scale and form of the proposed Plot A building have been secured through the course of the application. These changes have resulted in an improved relationship between the proposed Plot A building and the Mount Terrace houses and gardens. Whilst this will still be a marked change to their existing situation, Officers are of the view that this is acceptable when balanced against other key policies such as the site forming part of a Site Allocation, being in an Opportunity Area and the desirability of providing clear definitions and enclosure through building frontage – as required by Local Plan Policy D.DH2 – and such as will be created by the proposed Plot A building. Plot A is a prominent site and reintroducing built development on it, including a high degree of active frontage, will be positive for the area and clearly outweigh any harm to the outlook or sense of enclosure that may be perceived by Mount Terrace residents.
- 7.331 In relation to Plot B3 and the impact on buildings on the opposite side of New Road, it is to be noted that the western part of this Plot is occupied by the former Outpatients Annexe. The proposed replacement building on this part of the site is of a similar scale. Whilst there is a taller element beyond this, the set back from the New Road frontage would mean that there would be no unacceptable impacts in terms of unacceptable increase in the sense of enclosure. In addition, the majority of the New Road frontage of Plot B3 would be looked onto by the New Road Hotel where there is not the same expectation for outlook as with residential properties.
- 7.332 With regard to Plot C and its relationship to Gwynne House, it is to be noted that the existing building that occupies the site (the former dental hospital and the Barts Students' Union at the eastern end) is built immediately up to the boundary of Gwynne House. The proposed development, whilst taller, would be moved away from the boundary with Gwynne House and some open space would be provided between the boundary and the proposed new building. Overall, Officers consider that the proposal will result in an improved outlook and less sense of enclosure than the existing situation.

#### Privacy, outlook and enclosure conclusion

- 7.333 The proposed development will result in some impacts to residential properties that are adjacent to the site. Where potential impacts on privacy are concerned these can be adequately controlled by planning condition. Where impact on outlook and sense of enclosure are concerned, having regard to the scale and form of development and the existing pattern of development or otherwise on the site these may be perceived most negatively by Mount Terrace residents. However, Officers are of the view that the correct balance has been struck between the scale and form of the development so that it does not unacceptably affect these residents and the need to acknowledge the fact that the site is within an Opportunity Area and forms part of a Site Allocation. Overall, Officers are satisfied that the proposed development will not result in unacceptable impacts in respect of privacy, outlook and sense of enclosure.

#### Noise and Vibration

- 7.334 Review of the relevant noise and vibration information by both Temple and LBTH Environmental Health has concluded that noise and vibration impacts can be acceptably controlled via planning conditions. In accordance with the recommendations of these specialists it is recommended that conditions are attached to the permission, if granted, in relation to restrictions on demolition and construction activities, noise from plant and kitchen extract standards.

#### Construction Impacts

- 7.335 The application is supported by a draft Construction Environmental Management Plan (CEMP). This outlines measures to be put in place to minimise the environmental, amenity and safety impacts of the development during the demolition and construction phase. If permission is granted then it is recommended that a condition is attached to the decision requiring approval of a CEMP. This is necessary as this is a largely speculative development

that is likely to come forward on a plot-by-plot basis and the details to inform a final Plan are not known in full at planning application stage (for example contractors are not known and agreements with LBTH Highways and TfL are not in place)

- 7.336 In addition to the above, the Council's Planning Obligations SPD seeks a contribution of £1 per square metre of non-residential floorspace towards Development Co-ordination and Integration. This is required in order that the Council can effectively manage the impacts of construction activity both on-site and within the surrounding streets and spaces. This includes dealing with cumulative effects which may arise when other developments across the borough are taken into account. The Applicant has agreed to pay the required contribution, and this would be secure through the S106 legal agreement.

#### Wind microclimate

- 7.337 The application has been accompanied by information on wind microclimate and this has been reviewed by Temple. The outcome of this review is that the proposals are largely acceptable.
- 7.338 During the course of the application, it was identified a point that had been tested adjacent to Plot B3 was incorrect. Here, the applicant suggested that the comfort level being suggested by Temple on behalf of LBTH was not appropriate since the area is proposed to be used for 'flexible fair weather outdoor seating'. Given seating in this area would be temporary (i.e. would not form part of the proposed landscaping/public realm) the position of the applicant is accepted and this matter is resolved.
- 7.339 In addition, conditions around Plot D1 have been identified as requiring additional mitigation in the form of tree planting, a raised planter and low level planting. This can be secured by planning condition if permission is granted. The mitigation will need to be in place before the development is full complete to ensure the exceedances that have been identified are mitigated before any detriment could occur.

#### Landscape and Biodiversity

- 7.340 Policy G1 of London Plan requires green infrastructure to be incorporated into new development whilst Policy G5 requires major development proposals to contribute to the greening of London by including urban greening and incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Policy G5 requires that Boroughs develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening in new developments. For developments that are predominantly commercial a target score of 0.3 is recommended. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively and should aim to secure net biodiversity gain.
- 7.341 Local Plan Policy D.ES3 requires major development to provide net gains in biodiversity that contribute to Local Biodiversity Action Plan (LBAP) objectives. Where trees are concerned, D.ES3 requires protecting and increasing the provision of trees. If loss or impact on trees is considered acceptable then replacements are to be provided on an at least one-for-one basis.
- 7.342 There is little existing biodiversity or greening on the sites therefore the proposed development presents an opportunity to secure enhancements.
- 7.343 Information presented with the application as originally submitted showed that the development could achieve an Urban Greening Factor (UGF) score of 0.218. Changes that have been made since the application was submitted have resulted in an improvement to the UGF score to 0.227.
- 7.344 The submitted information has been reviewed by the Council's Ecology and Biodiversity Officer who, whilst noting that the score is well below the London Plan target for commercial development, has confirmed that the UGF calculation is appropriate.
- 7.345 In terms of Biodiversity Net Gain, the relevant report contained within the application suggests that there will be significant net gain through green roofs and ornamental planting. Given the extensive green roof proposals across the site, there is potential for these to be of significant

biodiversity value. Planting at street level also has significant potential to contribute, particularly to nectar-rich plants.

- 7.346 The application contains sufficient information to be satisfied that the requirements of the relevant policies are met as closely as possible. If permission is granted then the final details of biodiversity mitigation and enhancements are recommended secured through a condition attached to the decision.
- 7.347 In terms of the impact of the development on existing trees on the site this has been considered by LBTH's Arboricultural Officer. The Officer has confirmed that the categorisations given to each tree are acceptable. With regard to In regard to tree loss, the Arboricultural Officer has no objections to the removal of T17, T22 – T26, T38 – T39, T42 and T44 – T46 and considers that their loss can be adequately mitigated through the new planting proposed. The Arboricultural Officer also has no objection to the transplantation of T18 – T21. However, the Arboricultural Officer does not support the proposed removal of T37, T40 and T41 as in their view their loss cannot be adequately mitigated. T37 is located to the rear of the Garrod Building where the service bay to Plot D1 is located. T40 and T41 are located on Plot A.
- 7.348 In relation to proposed protection measures and facilitation pruning outlined in the method statement accompanying the application, this will ensure construction will have a negligible impact on retained trees in accordance with the requirements of policy D.DH6 of the Tower Hamlets Local Plan 2031 (2020) and Section 197 of the Town and Country Planning Act 1990 (as amended). These are to be retained in place for the duration of the construction works.
- 7.349 The Arboricultural Officer has also confirmed that there is a good mix of native and non-native species proposed, meeting an important LBAP target and safeguarding against current and future pests and diseases. Due consideration has also been given to planting locations and the overall size and shape of the species chosen, ensuring post development pressures are mitigated and the trees can grow to their full proportions without regular or heavy pruning.
- 7.350 Proposed stock sizes are also confirmed by the Arboricultural Officer as being acceptable as these will provide an instant amenity impact and ensure canopy cover loss is appropriately mitigated from an early stage. However, Submission of a tree planting methodology in line with BS 8545 is also required and should describe a process for planting and maintaining young trees that will result in them successfully establishing in the landscape. This should include current and proposed utility and service runs, any proposed changes to the highway layout and a methodology for the successful transplantation of T18 – T21 and a 3-year replacement plan, which will see all trees which fail to establish replaced like for like.
- 7.351 It is evident from the above views of LBTH Arboricultural Officer that the proposal has some significant benefits. The proposals will provide welcome greening to the area which will not only be aesthetically pleasing but will also improve biodiversity in the locality.
- 7.352 The lack of Arboricultural Officer support for the removal of a number of T37, T40 and T41 is noted. However, where tree T37 is concerned the layout of the proposed development means that this tree cannot be retained. The tree is located in what the applicant describes as a critical location for service access to Plot D1. This is perhaps true in the context of the design that has been put forward however it remains unclear whether the optimum solution of consolidating servicing on the site could have resulted in a sortition which would have meant retention of this tree was possible.
- 7.353 Where the trees on Plot A are concerned, Officers are of the view that the benefits of developing Plot A – in terms of repairing the fragmented street scene at this location and enhancing the setting of the adjacent Mount Terrace and in turn, the benefits this will bring to the conservation area – are sufficient to outweigh the harm arising from the loss of the trees.
- 7.354 Overall, whilst it is regrettable that T37 is not able to be retained Officers are satisfied that that the applicant has made sufficient effort to retain trees on the site. Thirty of the 39 on site are to be retained. In addition, Officers are of the view that in considering the acceptability of the



loss of some trees on the site, great weight should be given to the fact that 143 new trees are to be planted across the site. This is significantly beyond the one-for-one minimum set out on policy and is considered to be acceptable.

### **Highways, Transport and Servicing**

7.355 Development Plan policies promote sustainable transport and travel and the limiting of car parking. Safe and appropriate servicing is also required, with this taking place within the site unless specific circumstances apply.

#### Trip generation

7.356 The Transport Statement and Transport Statement Addendum have assessed the likely trip generation associated with the proposed development. The Transport Statement Addendum has reassessed the figures provided within the original Transport Statement to take into account the post-submission reductions in floorspace.

7.357 It is estimated that in the AM peak there will be a total 1,025 two-way trips. Of these, trips by public transport are expected to comprise 421 trips by underground, 213 trips by rail, and 155 bus trips.

7.358 The site has a PTAL of 6a, reflecting it being served by an excellent range of public transport services, including the Elizabeth Line, District Line, Hammersmith and City Line, London Overground and numerous bus routes. TfL have raised no concerns with regard to the local public transport network being able to accommodate the additional demand. In terms of the vehicular impact to the Transport for London Road Network and the local highway network the development would be car free, including removal of the existing car parking bays, with no impacts having been identified by either TfL or LBTH Highways. Trip generation impacts are therefore considered acceptable.

#### Cycle Parking.

7.359 A total of 1,110 long-stay spaces will be provided which include a range of cycle parking types to cater for all users. The long-stay cycle parking will be supported by showers and lockers, in accordance with the guidance set out in the London Plan.

7.360 In terms of short-stay cycle parking spaces, 184 spaces would be provided in the public realm areas in the form of 92 Sheffield Stands, to cater for visitors. The number of cycle parking spaces is an increase of 56 spaces over the London Plan minimum requirements.

7.361 Although general plans have been supplied there is no cycle strategy included in the submission which details the access to the stores and how this links with existing and proposed cycle infrastructure. In addition, whilst the proposals numerically meet the standards there are a number of deficiencies with the arrangements shown on the submitted drawings, including:

- The proposed cycle stores are very large, with some being located in building basements. From a security perspective it is usually preferable for the required number of spaces to be provided within a series of smaller stores.
- Where stairs are proposed (even as a secondary route) these should contain channels to aid cyclists moving their bikes and should be of a suitable gradient. It is not clear whether these could be provided on all stairs into the bike stores.
- The applicant has not addressed ease of access to the bike store in Plot A for those travelling in any direction other than east to west along Whitechapel Road (access to the store being through the front of the Plot A building).
- Proposed access arrangements to the basement cycle store in Plot C are poorly designed. From the street three doors would need to be passed through before reaching a lift to the basement. The lift to the basement would have a dual use, it also functioning as the goods lift for the upper floors of the building. At times this shared use will inevitably result in a reduction in ease of access to the cycle parking spaces. Should a cyclist wish or need to

use the stairs instead (which is quite probable given the lift to the basement would not be for the exclusive use of cyclists) then a total of nine doors would need to be passed through to reach the cycle store (six at ground floor and three at basement level). Further, the staircase to the basement has a return landing on it which would make it difficult for cyclists and their bikes to pass each other on the stairs.

- For Plot B3 whilst a dedicated cycle lift is proposed which would benefit from easy access from the street, the alternative access by stairs is constrained by being provided with a return which does not appear to have been enlarged to aid cyclists passing on the stairs with their bikes.
- The scale of the proposed building on Plot D1 is such that any basement bicycle store should have a ramped access so that cyclists can cycle directly into the basement. This has not been provided. The proposed access is one lift and one staircase. Officers are concerned that at peak usage times no ramped access and access to only one lift may not prove convenient or conducive to cycling in terms of wait times. In addition, some of the cycle parking for Plot D1 is located at basement level on Plot D2, remote from (though connected by tunnel) to Plot D2.

7.362 Beyond consideration of cycle parking within the proposed buildings, it is necessary to consider the impacts of the proposed development on TfL cycle hire provision in the locality.

7.363 There is an existing cycle hire docking station (CHDS) at the back edge of the footway on New Road. Were the development to go ahead it would be necessary to move this given the existing position would be in front of ground floor retail space in the proposed Plot A building. The applicant is proposing to move the existing cycle hire hub in New Road from the back of the footway to the kerbside at the junction with Whitechapel Road. However, they have not demonstrated that this location is feasible from the perspective of consideration of underground services.

7.364 In addition, the proposed location would impede the sight line of vehicles exiting Mount Terrace. It is noted that the applicant has suggested the removal of a number of cycle bays may be required to provide the required sightlines. However, this would run counter to the need to increase the number of cycle spaces in this location and is clearly not a solution that prioritises encouraging sustainable modes of travel.

7.365 At present neither TfL nor LBTH Highways have confirmed that the proposed New Road CHDS arrangement would be safe and satisfactory. Further, no provision has been made within the application for the expansion of TfL cycle hire provision in this location. Employment projections for this site project an upper level of 4,180 FTE staff to be based in the completed development. It is unacceptable to not increase cycle hire provision in this location to mitigate the additional demands that will arise on this development. TfL cycle hire in this location is already in very high demand and includes heavy use by staff of the Royal London Hospital, including significant demands by Hospital staff who work antisocial hours.

7.366 Having regard to the above considerations it is concluded that arrangements for access to the site by cycle are deficient in a number of areas. With regard to provision for cycles within the proposed buildings the deficiencies in their design need to be weighed against wider benefits arising from the proposed development.

7.367 In terms of the unresolved issues around the TfL cycle hire provisions Officers recommend that these are dealt with via condition that will be required for this development if permission is to be granted. A sum of money is also agreed towards improving cycle hire provisions and will be secured in the legal agreement.

#### Car Parking

7.368 The new development proposed for the site is to be car-free. In addition, the development of Plot A would involve the removal of some car parking associated with the hospital, which was installed during the Covid period. Having regard to both these factors, the operational development would result in an overall reduction in vehicular traffic movement associated with the site.

7.369 The applicant is proposing five additional Blue Badge bays across the development site on the public highway. Four would be on Stepney Way (two outside Plot B3 and two outside Plot D1) and one would be on Newark Street outside Plot C. LBTH Highways have commented that this provision seems low, especially when those on the public highway could be used by any Blue Badge holder and not just those who are users of the development. It is, however, noted that there are also eight existing Blue Badge holder spaces on Turner across which would remain (though provided in a different arrangement to the east side of Turner Street only). On balance the level of Blue Badge parking is considered to be acceptable.

### Servicing

7.370 All servicing is proposed to take place in dedicated areas with none taking place on the public highway. Some consolidation between buildings would take place. In summary:

- Plot A servicing area is consolidated with Plot B1.
- Plot B1 is provided with a service /loading bay inside the building, accessed from the south side of the building from proposed 'Turner Yard' (former Pasteur Street. Access to and from this bay would require manoeuvring on Turner Yard to allow for vehicles to enter from and leave on to New Road in forward gear. An annotation on the swept paths in relation to Plot B1 notes 'If service yard occupied, vehicle can be unloaded from Turner Yard. Vehicle can turn once service yard vacated.' i.e. it is anticipated that there will be occasions where the service yard is not available for a vehicle to access. Whilst Turner Yard would be publicly accessible it would remain as private land.
- Plot B2 servicing would remain as existing from Turner Street and controlled via existing Barts Health Trust hospital operations.
- Plot B3 would be provided with a service yard within the building. Access would be taken from Stepney Way and egress to the north onto Turner Yard.
- Plot C would be provided with a service yard within the building. Access would be taken from Newark Street. Swept path information provided in the application shows that vehicles could manoeuvre within the bay, allowing for entering and leaving in forward gear.
- Plot D1 would be provided with a service yard within the building. Access would be taken from Newark Street. A vehicle turntable would be provided within the loading bay so that vehicles could enter and leave in forward gear. The swept path information shows that there will be occasion where a vehicle entering Plot D1 needs to temporarily wait for an exiting vehicle to pass. This would take place in an open area off the public highway set beneath the main body of the building.

7.371 Though LBTH Highways have commented that they welcome the consolidation arrangements that are proposed, they wish to see the proposals for consolidation go further and take place across the whole site. The aim of this would be to help reduce multiple vehicle trips across the site and reduce the number of vehicles on the network.

7.372 The optimum solution would be for such consolidation to take place via a servicing hub facility. Explanations have been provided as to why the applicant considers this is not feasible. This includes future tenant requirements and health and safety concerns. Officers accept that transporting potentially hazardous materials via the footways could be a cause for concern, however Officers consider that it has not been satisfactorily evidenced as to why such a high value development could not provide for consolidated, managed and secure servicing arrangements below street level i.e. via connected basements.

7.373 If permission were granted a full Delivery and Service Management Plan would be required by condition. This could be drafted as to require consolidation proposals to be worked up further. However, given the applicant's current position on this and their overall approach to dealing with each plot as a discrete entity it is questionable as to whether the Plan would yield material benefits to overall servicing demands. This, together with the urban design deficiencies (discussed earlier in this report) arising from the proposed servicing

arrangements, lead Officers to conclude that the proposed servicing arrangements are not the optimum solution that a development of this scale should be able to achieve. These deficiencies will therefore need to be weighed against the overall benefits that will flow from the proposal as a whole.

## Waste

### *Commercial waste collection*

- 7.374 The proposed development is for commercial units which would be serviced by external waste collection contractors. Private contractors can adapt to varying needs e.g. by ensuring that waste collection vehicles would be sized appropriately for waste collection. Swept path analysis has been submitted which shows access for collections would be via Turner St, Newark Street and Stepney Way. The development is designed such that the on-site management team will be responsible for ensuring that commercial waste collection is undertaken responsibly and safely. In principle these factors are all acceptable.
- 7.375 Whilst that is the case, LBTH Waste have commented that where possible, a consolidated waste collection arrangement should be conditioned, such that the same waste vehicle will collect waste from all plots as part of the same collection of that waste stream. The aim of this would be to minimise the number of waste vehicle trips across the development. As a principle this is desirable and it is recommended that a condition is attached to this effect should permission be granted.

### *Impact on Mount Terrace waste collection arrangements*

- 7.376 The residential properties on Mount Terrace are outside of the application site, though the site boundary wraps around these houses and their gardens on all sides. The existing waste collection arrangement for these properties is via Eurobin (four in total – two for recycling and two for general waste). The bins are currently located beyond the easternmost house on Mount Terrace. Land ownership information submitted with the application shows this land to be in the ownership of Barts.
- 7.377 If the development were to be approved, then alternative waste collection arrangements would be needed for the Mount Terrace residential properties. This is because the position in which the bins are currently stored would be adjacent to part of the new Plot A building, with this particular part of Plot A proposed to house access to a substation as well as ground floor windows to the community space at the eastern end of Plot A. The existing arrangement could not continue as access to the substation could be obstructed from a health and safety perspective and it is unlikely that the developer would allow the Eurobins to be stored in front of windows into their new Plot A building.
- 7.378 This matter has been raised with the applicant and they have proposed an alternative location on the southern side of the street, to the east of the emergency access barrier. It would have been preferable for a more considered solution to this issue and for the bins to have been located within the built form of development. However, Officers accept that the existing situation is unusual and presumably results from the fact that Mount Terrace is a private road with barriers at either end.
- 7.379 On balance and having regard to the existing arrangements, the proposed solution is considered to be acceptable albeit it is unfortunate to have Eurobins stored externally on newly improved public realm.

## Public Realm

### *Highway works*

- 7.380 The application includes changes to Stepney Way. Currently Stepney Way is two-way from New Road up to the Royal London Hospital, where it then changes to one way eastbound only beneath/between the hospital building. This involves making this road one-way for its length (eastbound entry only from New Road, no west bound exit onto New Road as exists currently).
- 7.381 LBTH Highways are supportive of this proposal as it will contribute to lower levels of traffic in general through the area as well as improving the local environment for pedestrians and

cyclists. It is, however, noted that the one way proposals would inhibit the direct onward travel of cyclists who are travelling west via the existing cycle contraflow route on Stepney Way (underneath/between the hospital building). The proposed changes to the highway network will not impact on existing routing for emergency vehicles accessing the Royal London Hospital.

- 7.382 In addition, if permission were granted then Turner Street would be made one-way for traffic (south bound only) between Stepney Way and Newark Street. This will facilitate the provision of wider footways either side incorporating the existing loading and parking bays. Newark Street, between Turner Street and New Road will also be made one-way for traffic, westbound. Similarly Newark Street east of Turner Street would become a one-way street with a defined carriageway width of approximately 6m. The footway on the northern side of the street (alongside Plot C) will be widened and incorporates the existing bays
- 7.383 Traffic calming measures to reduce speed are also proposed on highways within the site. If permission were to be granted, then the proposed changes would be subject to a comprehensive agreement under S.278 of the Highways Act, with works carried out by LBTH to the authority's standards. It should be noted, however, that the applicant is proposing flush kerbs in some areas and this is not supported by the highway authority. Such an arrangement would not be acceptable for anyone who is visually impaired and fully flush footway / carriageway on the public highway will not be carried out under the S.278 agreement.
- 7.384 Whilst the Stepney Way proposals would create more space for pedestrians on highway land, the proposal is less successful on New Road. The applicant has been requested to move the building line of those buildings fronting New Road back to improve the current narrow footways along the eastern side of New Road. These footways will be subject to increased footfall as a result of the development and are currently narrowed even further by bus stops and cycle stands. The applicant, however, has not taken this on board and has designed to the existing building line. LBTH Highways have advised that the existing footways are not suitable for the increase in footfall that is expected during the operational phase of the development.
- 7.385 Whilst there would clearly be some deficiencies in the respect of highway works, Officers consider that these need to be balanced against the public realm works as a whole such works being assessed as an overall benefit flowing from the proposal.

#### *Non-highway works*

- 7.386 Significant areas within the site are not public highway, but will be subject to public realm improvement works. The submitted plans show that the proposed approach to public realm is intended to result in a cohesive appearance across the site. This is an appropriate response.

#### *Permeability*

- 7.387 Permeability through the site, off the public highway, is to be improved. In principle this is welcomed. However, as noted earlier in this report there are a number of deficiencies in proposals from a place shaping/urban design perspective – most notably the proposals for the green spine to the east of Plot D1.

#### *Active Travel Zone*

- 7.388 The applicant has carried out an Active Travel Zone (ATZ) assessment and has provided a number of recommendations, including lighting improvements and the provision of tactile paving at crossings.
- 7.389 TfL have confirmed that no ATZ works are required to highways under their control.

#### *Highways, Transport and Servicing conclusion*

- 7.390 In certain respects the proposed development does not present the optimum solutions in relation to proposed highway, transport and servicing arrangements. The applicant's desire to largely treat each unit as a discrete entity has not assisted with the issues that have been

identified. Some betterment on deficient areas will be able to be achieved through the recommended transport/highway related conditions and planning obligations.

- 7.391 Notwithstanding the deficient areas Officers do acknowledge that the completed development will deliver substantial improvements to the public realm across the site. This benefit along with other benefits flowing from the development will need to be weighed against the identified deficiencies in the proposals. This is discussed later in the report under 'Planning Balance'.

## **Environment**

### **Energy and Environmental Sustainability**

- 7.392 The Local Plan requires non-residential development post-2019 to be zero carbon with this being achieved through a minimum 45% reduction in regulated carbon dioxide emissions and the remaining regulated carbon dioxide emissions to 100% to be offset through a cash in lieu contribution.
- 7.393 Policy SI2 of the London Plan also requires major development to be net zero-carbon. The London Plan requires that an energy hierarchy is followed to reduce greenhouse gas emissions in operation and minimise both annual and peak energy demand.
- 7.394 The London Plan also requires that non-residential development achieves 15% of the carbon reductions beyond Part L from energy efficiency measures alone. Clearly a key aspect of achieving carbon reductions is via energy efficiency measures. To ensure such measures are applied in a consistent manner, the Local Plan requires that energy efficiency measures are based on BREEAM (Building Research Establishment Environmental Assessment Method) standards. For new non-residential development providing floorspace of greater than 500sqm the Local Plan requires proposals to meet at least BREEAM 'Excellent' standards.
- 7.395 The table below summarises the regulated carbon dioxide savings from each stage of the energy hierarchy for the site for both the originally submitted proposal and for the amended proposal under the 'addendum submission'.

	<b>Regulated non-domestic carbon dioxide savings</b>			
	<b>Tonnes CO2 per annum</b>		<b>%</b>	
	<b>Original submission</b>	<b>Addendum submission</b>	<b>Original submission</b>	<b>Addendum submission</b>
Be lean: savings from energy demand reduction	109.3	122.2	9%	11%
Be clean: savings from heat network	0.0	0.0	0%	0%
Be green: savings from renewable energy	358.3	326.4	30%	29%
Total cumulative savings	467.6	448.7	40%	40%
Annual savings from offset payment	716.0	672.7	-	-
	<b>Tonnes CO2</b>			

Cumulative savings for offset payment	21,481	20,181	-	-
Carbon offset (cash in lieu) contribution £	2,040,667	1,917,257	-	-

- 7.396 As can be seen from the above table, the proposal does not meet LBTH's requirement for 45% reduction in CO2. Similarly, the proposal does not meet the 15% requirement savings from energy demand reduction, though Officers do note that there has been an increase since the original submission.
- 7.397 The applicant's Energy Statement Addendum explains that the significant carbon reductions have been achieved against the challenge of a very high energy use from life science wet laboratories, noting that were the buildings to be standard offices the reductions would be greater.
- 7.398 At first sight it may appear concerning that the borough's basic requirements are not being met for this proposal. However, the GLA's 15 June 2022 'Note to accompany GLA Energy Assessment Guidance 2022' states *'non-residential developments may find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35 per cent improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments but not for residential developments. However, planning applicants will still be expected to follow the energy hierarchy to maximise carbon savings before offsetting is considered.'*
- 7.399 Notwithstanding, it appears that the requirements of the 'be clean' strand of the hierarchy have not fully been addressed. The London Plan requires the reduction of carbon emissions through the use of zero or low-emission decentralised energy prioritising connection to district heating and cooling networks and utilising secondary heat sources.
- 7.400 The supporting text to London Plan Policy SI2 states that where development is proposed in Heat Network Priority Areas this should follow the heating hierarchy in Policy SI 3 – Energy Infrastructure. The GLA's Heat Map confirms the site is within a Heat Network Priority Area therefore the requirements of SI 3 must be considered.
- 7.401 Whilst the requirement to produce an energy masterplan cannot be imposed upon the developer (as these are intended to cover much larger areas), it is noted that such masterplans should identify major heat loads, opportunities for future connections, secondary heat sources including waste heat and opportunities for futureproofing utility infrastructure networks to minimise the impact from road works.
- 7.402 Given the site is within a Heat Network Priority Area and would itself generate waste heat, it appears that there is a significant missed opportunity with the development to either connect into a future network or itself supply waste heat to a future network.
- 7.403 The GLA Energy have commented that correspondence from the applicant which is attempting to justify interconnection with the hospital is out of date. This is therefore an outstanding item. GLA Energy have also requested that the applicant provides a drawing robustly demonstrating the insurmountable constraints for interconnectivity between the blocks and where this is proved feasible to propose safeguarded pipe routes, with the design showing that connections have been minimised.
- 7.404 Officers are concerned that this information has not been provided and thus that every opportunity has not been taken to reduce carbon emissions. Linked to this, a large part of the applicant's asserted benefits of the proposed scheme are the public realm works that are proposed on the site. The effect on road works from installing infrastructure is noted in Policy SI 3. Officers are concerned of the impact on public realm of installing infrastructure at a later date. Not only would this cause unnecessary inconvenience for those living, working and travelling through the area but it may also be problematic in terms of sourcing of materials and

quality of workmanship for reinstatement as well as wasteful where materials are dug up and cannot be reused.

7.405 Overall, whilst Officers are concerned that the proposal does not appear to have exhausted every opportunity to minimise current and future carbon emissions from the site it is acknowledged that the guidance notes potential difficulties in achieving this on commercial developments. Notwithstanding, Officers consider that this item alone would not form a recommendation for refusal of the application and that some potential betterment on the situation can be achieved through planning conditions and planning obligations should the development be found to be acceptable in all other respects and permission granted. In addition it is to be noted that irrespective of the above considerations the proposal would ultimately be the equivalent of zero carbon since it would be liable to pay a carbon offset contribution to fund off-site carbon reduction schemes. It would also be compliant with LBTH's BREEAM requirement, in that the Energy Statement confirms that the development would gain sufficient credits to achieve the required 'Excellent' rating.

7.406 Having regard to the foregoing, if permission is granted then it is recommended that the following forms part of the decision:

- Provision for future connection to district heat network (via S.106 agreement)
- Provision of a waste heat utilisation strategy (via S.106 agreement)
- Pre-commencement planning condition requiring provision of drawings to demonstrate the safeguarding design for future district heat network connection per block
- Pre-commencement planning condition requiring further PV provision (including via biosolar arrangement)
- Pre-commencement planning condition requiring outstanding concerns in relation to Be Lean Energy efficiency to be addressed
- Pre-commencement planning condition requiring up-to-date correspondence with Barts regarding supply of heat to the proposed development

#### Air Quality

7.407 Matters relating to air quality have been assessed within the submitted Environmental Statement. The information has been reviewed by LBTH's externally appointed competent expert, Temple, as well as the GLA and LBTH Environmental Health. The information relating to air quality has been found to be acceptable by the relevant experts. To ensure that the development meets the appropriate air quality standards, in accordance with the advice of the relevant experts it is recommended that conditions are attached to the decision, if permission is granted, relating to the following:

- Dust Management Plan and PM10 Monitoring
- Kitchen Extract Standards for Commercial Uses
- Construction Plant and Machinery (NRMM – low emission standards)
- Emergency Generator flu Locations
- Air Quality and Dust Management Plan
- Measures to reduce the cumulative impact of the emergency generators
- Demolition Method Statement (DMS)
- Construction Method Statement (CMS)
- Construction Environment Management Plan
- Travel Plan
- Compliance with emissions parameters
- Car-free provisions

#### Greenhouse Gases

7.408 Matters relating to greenhouse gases (GHG) have been assessed within the submitted Environmental Statement. The information has been reviewed by LBTH's externally appointed competent expert, Temple, as well as the GLA.

7.409 The information assessed the likely significant effects of the Proposed Development on GHG emissions by estimating those associated with aspects across the project lifecycle. The GHG



assessment follows a Whole Life Carbon (WLC) approach, deriving its data from the separate WLC Assessment, as well as the operational transport assessment and the separate energy strategy

7.410 In terms of mitigation, Temple's review has concluded that this could be adequately addressed through the measured embodied within the development as well as conditions and obligations pertaining to matters such as:

- Compliance with an approved CEMP
- Waste Management Plan
- Demolition Method Statement
- Construction Method Statement
- Travel Plan and car free
- Energy

7.411 In addition, the GLA have assessed the Whole Life Cycle Carbon (WLC) Assessment in their stage 1 referral response. The GLA have confirmed that they have no further comments and no further actions are required by the applicant at the planning stage – all previous queries having been responded to. In accordance with the GLA's advice Officers recommend that should permission be granted then a condition should be attached to the decision in relation to the post-construction WLC assessment.

#### Flood Risk and Drainage

7.412 A Flood Risk Assessment and a SuDS (Sustainable Drainage Strategy) Strategy Report have been submitted with the application.

7.413 The site lies within Flood Zone 1, which is an area assessed as having 1 in 1000 or less annual probability of river or sea flooding (<0.1%). The site has been assessed as being at very low probability of flooding from fluvial and tidal sources. It is also assessed as being at low risk of flooding from sewers and other drainage networks as long as they are adequately maintained.

7.414 The site has been assessed as being at low risk from groundwater sources, subject to a suitable waterproofing strategy at basement level. The ES review has confirmed that such mitigation is already embedded in the proposal. The site has also been assessed as being at low risk from surface water flooding and it does not lie within a critical drainage area.

7.415 The site does not currently cause flooding to adjacent sites and sustainable drainage measures are proposed to be incorporated within the proposed development. Therefore, the risk to adjacent properties will be adequately mitigated.

7.416 The sustainable drainage proposals are to reduce the surface water discharge from the proposed development to greenfield rates. In order to achieve this the proposed attenuation features for the development will comprise of a combination of attenuation systems within the building footprints in the form of blue roofs and storage tanks, located above basement level in order to achieve a gravity discharge into the surrounding public sewer and within the external landscaped area in the form of permeable paving and geo-cellular tanks to achieve a gravity discharge into the surrounding public sewers. External landscaped areas will be attenuated outside building footprints within permeable pavements and geo-cellular tanks which would allow a gravity connection into the public sewers.

7.417 A schematic SuDS layout has been provided however final detailed SuDS proposals will need to be approved by LBTH in due course. This is recommended to be secured by planning condition should permission be granted. Subject to this, the proposal would be acceptable with regard to flood risk, sustainable drainage, sewerage and water supply and use and as such accord with relevant policy and guidance as set out in the NPPF, Policies 5.12, 5.13 of the London Plan and Policies D.ES4, D.ES5 and D.ES6 of the Local Plan.

#### Ground conditions

7.418 Information submitted with the application covers the matters of groundwater, human health, unexploded ordnance (UXO), ground gas and volatile and semi-volatile organic compounds. All effects arising from such have been found within the Temple's review of the Environmental Statement to be acceptable subject to conditions being attached to the permission, if granted, requiring the following:

- Construction Phase Plan
- Construction Environmental Management Plan
- Materials Management Plan
- Further Ground Investigation for geotechnical purposes in plots yet to be demolished to allow production of a Geotechnical Design Report. Additional ground gas monitoring to facilitate recommendations of ground gas protection measures
- Remediation Method Statement, inclusive of potable water pipe specification
- Detailed UXO Risk Assessment
- Verification Report to verify implementation and success of remedial measures
- Piling Risk Assessment.
- Assessment on the location and depth of London Underground and Royal Mail assets.

### **Planning Balance**

7.419 As discussed earlier in the report, the local planning authority has a statutory obligation under Sections 66 (1) and 72 (1) of the Planning (Listed Building and Conservation) Acts 1990 to the conservation of designated heritage assets. In accordance with the aforementioned Act, paragraph 205 of the NPPF sets out that 'great weight' should be given to protection of designated assets, 'irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

7.420 As stated in the Heritage section of this report, Historic England judged the harm to the Former London Hospital Conservation Area to be in the middle range of less than substantial and harm to the significance of the Grade II listed former Whitechapel Hospital through changes to its setting is in the lower half of the less than substantial harm range. Officers have no reason to disagree with this assessment. The harm is principally as a result of:

- The near total demolition of the historic free neo-Jacobean style Edwardian former Outpatients building but for the south and east elevations, where historic fenestration and glazing patterns to the ground floor are largely to be lost.
- The proposed vertical extension to the building the remaining elements of the former Outpatients building.
- The loss of the 1930s Outpatients Annexe building.
- The scale of the proposed building on Plot D1 which remains of a scale out of character with the surrounding conservation area, dominating the roofline of the former Whitechapel Hospital building

7.421 Upon that basis, it falls upon the Council, as decision maker to apply a public benefit planning balance test, as set out in paragraph 208 of the NPPF which states that "where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

The key public benefits are:

- a. Delivery of space for life science use and establishment of a new life science cluster in Whitechapel, with measures to be put in place to maximise local health outcomes.
- b. Delivery of a new research and teaching building for QMUL.
- c. New employment and training opportunities through both the construction and end use phase, including up to 4,180 FTE staff in the completed development and training and apprenticeship opportunities in both phases.

- d. Provision of community space including a Community Involvement Centre and space for education activities on site.
- e. A STEM outreach programme.
- f. Provision of high quality affordable workspace, substantially beyond the minimum requirements in development plan policies and planning obligations SPD
- g. New and enhanced public realm including strategic infrastructure in the form of a new section of Green Spine and the provision of a new public square adjacent to St. Augustine with St. Philip's Church and associated improvements to permeability.
- h. Improved levels of activity and animation at street level which in turn can lead to improved feelings of safety for users.
- i. Repair of the somewhat fragmented built form on the site.
- j. An enhanced setting to the grade II listed Mount Terrace and the grade II\* listed St. Augustine with St Philip's Church.

7.422 Officers are of the view that the public benefits identified under points a, b and c are matters which carry substantial weight having regard to the health and economic outcomes that will flow from them.

7.423 Officers consider that the public benefits identified under points d, e and f carry significant weight since they will ensure that the proposed development directly benefits local residents and ensures that the benefits of growth are shared in line with Local Plan policy objectives.

7.424 Officers assess the public benefits identified under points g, h, I and j to carry moderate weight since the proposals that lie behind these benefits are in certain respects deficient (as outlined elsewhere in this report).

7.425 Overall Officers' assessment is that the package of public benefits taken as a whole carries substantial weight which is sufficient to outweigh the harm that has been identified to heritage assets. Consequently, the proposal passes the 'paragraph 208' test.

7.426 In addition to the above balancing exercise, it will have been noted throughout this report that Officers consider the proposals to be deficient or harmful in a number of areas. This includes in the areas of cycle access, the non-consolidated servicing arrangements, daylight, sunlight and overshadowing impacts, failure to comply with tall buildings policy, urban design shortcomings for the proposed Green Spine, concerns over active frontages and the general scale of the proposal within the townscape.

7.427 Notwithstanding, Officers have assessed the above benefits as carrying sufficient weight to outweigh the identified deficiencies and harm.

### **Infrastructure Impact**

7.428 It is estimated that the proposed development would be liable for Mayor of London CIL of approximately £4,738,500 (exclusive of indexation).

7.429 Alongside CIL, Development Plan policies seek financial contributions to be secured by way of planning obligations to offset the likely impacts of the proposed development on local services and infrastructure.

7.430 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD, as follows:

- £323,908 towards construction phase employment skills training
- £1,705,440 (TBC) towards end-user phase employment skills training
- £17,280 toward carbon emission off-setting
- £1,917,257.00 toward carbon emission off-setting
- £180,000 towards development co-ordination and integration

## Human Rights & Equalities

- 7.431 The proposal does not raise any unique human rights or equalities implications. The balance between individual rights and the wider public interest has been carefully considered and officers consider it to be acceptable.
- 7.432 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD, as listed in the 'Recommendation' section below. The applicant is also delivering an enhanced public benefits package to offset impact and harm caused by the proposal.
- 7.433 The proposal will establish a new life science cluster for research and development as well as the creation of employment and training opportunities and potentially up to 4,180 FTE jobs. Affordable workspace will also be secured by the legal agreement which goes beyond Planning Obligations requirements.
- 7.434 The proposed development would provide for disabled workers and visitors to the site by providing safe and dignified access arrangements. Around the site, improvements are made to the wider public realm including delivery of publicly accessible open space. The proposal also includes the delivery of the Green Spine in line with policy requirements.
- 7.435 The proposal will also deliver a range of health benefits in line with Local Plan policy objectives in terms of growth bringing an improved quality of life and reduce health inequalities. Such health benefits include a *Health Outcomes Strategy and Health Strategy Framework* alongside a Health Outcomes Working Committee. Outcomes flowing from this are expected to include maintenance and promotion of good health and the reduction of health inequalities as well as the treatment of ill-health.
- 7.436 Finally, two new community facilities will be provided which will be accessible to residents, including those of school age.
- 7.437 The proposed development would not result in adverse impacts upon equality or social cohesion.

## 8. RECOMMENDATION

- 8.1 That subject to any direction by the Mayor of London, conditional planning permission is GRANTED subject to the prior completion of a legal agreement to secure the following planning obligations:

### 8.2 Financial Obligations

- a) £ 323,908 towards construction phase skills and training
- b) £1,705,440 (TBC) towards end-user phase employment skills training
- c) £2,500,000.00 towards wellbeing, women's health and community research
- d) £1,917,257.00 toward carbon emission off-setting
- e) £180,000 towards development co-ordination and integration
- f) £220,000 towards TfL cycle hire provision
- g) £100,000 towards monitoring the legal agreement

### 8.3 Non-financial Obligations

- a) Establishment of a group to foster collaboration between various stakeholders on a variety of topics, including reporting updates against agreed relevant strategies; exact Terms of Reference for the group to be confirmed in the detail of the s106 agreement
- b) Reasonable endeavours to facilitate access to employment; as follows:
  - 25% local procurement
  - 25% local labour in construction phase
  - 25% local labour in end use phase
  - 61 construction phase apprenticeships

- Pathways into life sciences provisions (including provision of two officer posts (one senior and one junior) for a period of 10 years to support primarily young residents (primary, secondary and college) and their parents/carers understand the employment opportunities flowing from the development)
- c) Affordable Workspace
- i) Provision of 10% of the qualifying NIA as Affordable Workspace comprising:
    - Affordable fitted out incubator space
      - approximately 65% of qualifying floorspace
        - at least 40% wet lab space
      - balance to be provided as write-up and dry lab space
        - 20% discount to all in costs (i.e. fully inclusive of service charges/membership for AW tenants), compared to market rate for equivalent
    - Entry Level office space
      - Approximately 35% of qualifying floorspace
      - CAT A fit out
      - 50% discount to all in costs (i.e. fully inclusive of service charges/membership for AW tenants), compared to market rate for equivalent
  - ii) To be provided for a minimum of 25 years and subject to periodic review
  - iii) Provision of entry level office space for an additional 10 years after the initial 25 year period, Based on 10% of the qualifying NIA floorspace with 10% discount below the average market rate.
  - iv) Plot C to be excluded from Affordable Workspace requirements subject to restrictions providing for that Plot to be occupied on a non-commercial basis.
- d) Education and Outreach - Science Technology, Engineering and Maths (STEM) provisions
- i) Approval of Community Education Outreach Programme Strategy
  - ii) Provision of a dedicated "Community Lab" and learning space
    - A free to use fitted out and equipped space on the ground floor of Plot A
    - Peppercorn rent
    - Minimum of 20 years
  - iii) Commitment to providing the appropriate resources for the delivery of the STEM activities.
  - iii) Establish life science ambassador programme.
  - iv) Annual life science festival for life of development.
- e) Community Involvement Centre
- i) Provision of a "Community Involvement Centre" accessible to the public and community groups:
    - To be provided on the ground floor of Plot D1 CAT B fit out
    - Peppercorn rent arrangements
    - Minimum of 20 years
    - Dedicated flexible community space comprising meeting rooms, co-working space, kitchen and WCs
    - Life science occupiers to provide commitment to locally agreed coproduction principles (reasonable endeavours)
- f) Skills Escalator

- i) Creation of a bespoke Skills Escalator Programme to coordinate the following across the masterplan:
  - School work experience
  - Internships
  - Adult work experience placements
  - Graduate paid placements
- g) Campus Strategy (to include details of an enterprise support programme and life science SME networking space).
- h) 40% or 19,513sqm (whichever is the greater) of NIA to be designed as wet lab capable.
- i) Provision of a retail strategy to manage active frontages .
- j) Provision and ongoing maintenance of public toilets and water fountains.
- k) Phases to be defined by reference to a plan appended to the legal agreement. Construction phasing plan also to be appended to the agreement.
- l) Delivery of St Phillip's Square/Public Realm Delivery Strategy (including backstop trigger , provisions for future maintenance and S.278 works).
- m) Health Outcomes Strategy and Health Strategy Working Committee
- n) Public realm access and management.
- o) Provision of public art.
- p) Sponsoring and managing of cultural events programme for St Phillips Square.
- q) Architect retention.
- r) Provision for future connection to district heat network.
- s) Provision of waste heat utilisation strategy
- t) Travel Plans
- u) Incorporation of Legible London way-finding

8.4 That the Corporate Director of Housing and Regeneration is delegated the power to negotiate the legal **agreement**. If within three months of the resolution the legal agreement has not been completed, the Corporate Director for Housing and Regeneration is delegated power to refuse planning permission.

8.5 That the Corporate Director of Housing and Regeneration is delegated the power to impose conditions and informatives to address the following matters:

#### 8.6 **Planning conditions**

##### **Compliance**

1. 3 years deadline for commencement of development.
2. Development in accordance with approved plans.

3. Occupation in accordance with life science definition (Class E (g)) as follows:  
*"Occupation for life sciences (as defined) unless otherwise approved in writing by the LPA"*.
4. Development to be undertaken in accordance with ES mitigation measures
5. Restrictions on Demolition and Construction Activities
6. Undertaking tree/shrub clearance outside of bird nesting season
7. Maximum Containment Level 2 laboratory use
8. Limitation of external noise from plant
9. Kitchen Extract Standards for Commercial Uses
10. Energy and sustainability standards
11. Hours of use
12. Hours of use of the terrace
13. Restriction on telecommunications apparatus

### **Pre-commencement**

14. Confirmation of Code of Construction Practice compliance
15. Conservation Area demolition
16. Method statement and structural information regarding retention of original facades on Plot B3
17. Demolition Method Statement (DMS).
18. Construction Plant and Machinery (NRMM)
19. Basements – highway protection
20. Measures to protect controlled waters including basements
21. Tree protection details
22. Submission of a tree planting methodology in line with BS 8545
23. Archaeological WSI, results dissemination and outreach (in consultation with GLAAS)
24. Assessment of location, depth and protection of LU and Royal Mail assets
25. Detailed design and method statement (in consultation with TfL)
26. UXO risk assessment (detailed)
27. Remediation Method Statement and Production of a Verification Report.
28. Materials Management Plan.
29. Geotechnical ground investigation and production of Geotechnical Design Report
30. Additional ground gas monitoring to facilitate recommendations of ground gas protection measures
31. Detailed Circular economy statement
32. Crane and scaffold details (in consultation with London City Airport)
33. Details of phasing

### **Pre-superstructure works**

34. Materials (details, samples, mock up panels)
35. Emergency generators flues
36. Plant – full details
37. Biodiversity, including bio solar
38. Site waste management plan
39. Sustainable drainage details and strategy
40. Details of cycle hire docking station re-provision

### **Pre-occupation**

41. Secured by Design certification (plot by plot)
42. Whole Life Carbon assessment post construction information (for each building)
43. Cooling demands (for each building)
44. Landscaping and management details, including to achieve UGF score of at least 0.227 and wind mitigation .
45. Deliveries and Servicing Management Plan

46. Erection (and details of) privacy screen on Plot C to protect amenity of Gwynne House residents
47. Erection (and details of) privacy screen on Plot A to protect amenity of Mount Terrace residents
48. Installation of low reflectance glass for the windows causing the solar reflection to point N1.
49. Travel Plan
50. Measures to reduce the cumulative impact of the emergency generators
51. Consolidated commercial waste arrangements
52. Detailed lighting strategy
53. Lights off scheme
54. Cycle parking
55. Majority active ground floor frontages and detailed design display bays



## APPENDIX 1

### LIST OF APPLICATION PLANS AND DRAWINGS FOR APPROVAL

#### Sitewide Plans

WCR00-AAM-XX-00-DR-AR-07000 Site Location Plan P2  
WCR00-AAM-XX-RF-DR-AR-07001 Masterplan - Existing / Demolition Masterplan P3  
WCR00-AAM-XX-00-DR-AR-07002 Masterplan - Proposed Ground Floor Plan P3  
WCR00-AAM-XXRF-DR-AR-07003 Masterplan - Proposed Roof Plan P3

#### Sitewide Elevations

WCR00-AAM-XX-ZZ-DR-AR-07200 Site Elevations - Whitechapel Rd Existing & Proposed P3  
WCR00-AAM-XX-ZZ-DR-AR-07201 Site Elevations - New Road East Existing & Proposed P3  
WCR00-AAM-XX-ZZ-DR-AR-07202 Site Elevations - Turner St West Existing & Proposed P3  
WCR00-AAM-XX-ZZ-DR-AR-07203 Site Elevations - Stepney Way North Existing & Proposed P2  
WCR00-AAM-XX-ZZ-DR-AR-07204 Site Elevations - Stepney Way South Existing & Proposed P2  
WCR00-AAM-XX-ZZ-DR-AR-07205 Site Elevations - Newark St North Existing & Proposed P2  
WCR00-AAM-XX-ZZ-DR-AR-07206 Site Elevations - Mt Terrace South Existing & Proposed P3  
WCR00-AAM-XX-ZZ-DR-AR-07207 Site Sections - North/South Existing & Proposed P3  
WCR00-AAM-XX-ZZ-DR-AR-07208 Site Sections - North/South Existing & Proposed P2

#### Plot A

WCRA0-AAM-XX-00-DR-AR-07100 Proposed Ground Floor Plan P2  
WCRA0-AAM-XX-01-DR-AR-07101 Proposed Level 01 Plan P2  
WCRA0-AAM-XX-02-DR-AR-07102 Proposed Level 02 Plan P2  
WCRA0-AAM-XX-03-DR-AR-07103 Proposed Plant / Terrace Level Plan P2  
WCRA0-AAM-XX-RF-DR-AR-07104 Proposed Roof Plan P2  
WCRA0-AAM-XX-ZZ-DR-AR-07200 Proposed North, West & East Elevation P2  
WCRA0-AAM-XX-ZZ-DR-AR-07201 Proposed South & South Courtyard Elevation P2  
WCRA0-AAM-XX-ZZ-DR-AR-07300 Proposed Sections AA & BB P2  
WCRA0-AAM-XX-ZZ-DR-AR-07301 Proposed Sections CC&DD P2  
WCRA0-AAM-XX-ZZ-DR-AR-07400 Bay Study - Whitechapel Road Main Entrance / North East P2  
WCRA0-AAM-XX-ZZ-DR-AR-07401 Bay Study - Whitechapel Road / North West P2  
WCRA0-AAM-XX-ZZ-DR-AR-07402 Bay Study - Turner Street / South East P2  
WCRA0-AAM-XX-ZZ-DR-AR-07403 Bay Study - New Road / West P2  
WCRA0-AAM-XX-ZZ-DR-AR-07404 Bay Study - Courtyard / South P2  
WCRA0-AAM-XX-ZZ-DR-AR-07405 Bay Study - New Road Building  
WCRB1-GTA-XX-ZZ-DR-AR-07406 Bay Study – Turner Street / East P1

#### Plot B1

WCRB1-GTA-XX-B1-DR-AR-07099 Proposed Basement Plan P2  
WCRB1-GTA-XX-00-DR-AR-07100 Proposed Ground Floor Plan P2  
WCRB1-GTA-XX-01-DR-AR-07101 Proposed Level 01 Plan P2  
WCRB1-GTA-XX-02-DR-AR-07102 Proposed Level 02 Plan P2  
WCRB1-GTA-XX-03-DR-AR-07103 Proposed Level 03 Plan P2  
WCRB1-GTA-XX-RF-DR-AR-07104 Proposed Roof Plan P2  
WCRB1-GTA-XX-ZZ-DR-AR-07200 Proposed West & East Elevations P2  
WCRB1-GTA-XX-ZZ-DR-AR-07201 Proposed North and South Elevation P2  
WCRB1-GTA-XX-ZZ-DR-AR-07300 Proposed Section A-A P2  
WCRB1-GTA-XX-ZZ-DR-AR-07301 Proposed Section B-B P2  
WCRB1-GTA-XX-ZZ-DR-AR-07400 Bay Study - New Road / West P2  
WCRB1-GTA-XX-ZZ-DR-AR-07401 Bay Study - Mount Terrace / North P2  
WCRB1-GTA-XX-ZZ-DR-AR-07402 Bay Study - Turner Yard / Main Entrance South P2

#### Plot B2/B3

WCRB3-AAM-XX-B1-DR-AR-07089 Existing Basement Plan with Demolition P2  
WCRB3-AAM-XX-00-DR-AR-07090 Existing Ground Floor Plan with Demolition P2  
WCRB3-AAM-XX-01-DR-AR-07091 Existing First Floor Plan with Demolition P2  
WCRB3-AAM-XX-02-DR-AR-07092 Existing Second Floor Plan with Demolition P2  
WCRB3-AAM-XX-03-DR-AR-07093 Existing Third Floor Plan with Demolition P2  
WCRB3-AAM-XX-ZZ-DR-AR-07290 Existing Elevations with Demolition - North & East P2  
WCRB3-AAM-XX-ZZ-DR-AR-07291 Existing Elevations with Demolition - South & West P2

WCRB3-AAM-XX-B1-DR-AR-07099 Proposed Basement Plan P2  
WCRB3-AAM-XX-00-DR-AR-07100 Proposed Ground Floor Plan P3  
WCRB3-AAM-XX-01-DR-AR-07101 Proposed Level 01 Plan P3  
WCRB3-AAM-XX-02-DR-AR-07102 Proposed Level 02 Plan P3  
WCRB3-AAM-XX-03-DR-AR-07103 Proposed Level 03 Plan P3  
WCRB3-AAM-XX-04-DR-AR-07104 Proposed Level 04 Plan P3  
WCRB3-AAM-XX-05-DR-AR-07105 Proposed Level 05 Plan P3  
WCRB3-AAM-XX-06-DR-AR-07106 Proposed Level 06 Plan P3  
WCRB3-AAM-XX-07-DR-AR-07107 Proposed Level 7 Plan - Plant P3  
WCRB3-AAM-XX-RF-DR-AR-07108 Proposed Roof Plan P2  
WCRB3-AAM-XX-ZZ-DR-AR-07200 Proposed North Elevation P2  
WCRB3-AAM-XX-ZZ-DR-AR-07201 Proposed East Elevation P3  
WCRB3-AAM-XX-ZZ-DR-AR-07202 Proposed South Elevation P2  
WCRB3-AAM-XX-ZZ-DR-AR-07203 Proposed West Elevation P3  
WCRB3-AAM-XX-ZZ-DR-AR-07300 Proposed Section A-A - East - West P2  
WCRB3-AAM-XX-ZZ-DR-AR-07301 Proposed Section B-B - North - South P2  
WCRB3-AAM-XX-ZZ-DR-AR-07302 Proposed Section C-C - Main Entrance Void P2  
WCRB3-AAM-XX-ZZ-DR-AR-07400 Bay Study - Turner Yard / North P2  
WCRB3-AAM-XX-ZZ-DR-AR-07401 Bay Study - Turner Street / East P2  
WCRB3-AAM-XX-ZZ-DR-AR-07402 Bay Study - New Road / West P2  
WCRB3-AAM-XX-ZZ-DR-AR-07403 Bay Study - Stepney Way / Main Entrance South P2  
WCRB3-AAM-XX-ZZ-DR-AR-07404 Bay Study - Turner Street / Main Entrance East P2  
WCRB3-AAM-XX-ZZ-DR-AR-07405 Bay Study - Stepney Way / Main Entrance North P2

#### Plot C

WCRC0-GTA-XX-B1-DR-AR-07099 Proposed Basement Plan P2  
WCRC0-GTA-XX-00-DR-AR-07100 Proposed Ground Floor Plan P2  
WCRC0-GTA-XX-01-DR-AR-07101 Proposed Level 01 Plan P2  
WCRC0-GTA-XX-02-DR-AR-07102 Proposed Level 02 - 04 Plan P2  
WCRC0-GTA-XX-05-DR-AR-07103 Proposed Level 05 Plan - Terrace P2  
WCRC0-GTA-XX-06-DR-AR-07104 Proposed Level 06 Plan P2  
WCRC0-GTA-XX-07-DR-AR-07105 Proposed Level 7 Plant P2  
WCRC0-GTA-XX-RF-DR-AR-07106 Proposed Roof Plan P2  
WCRC0-GTA-XX-ZZ-DR-AR-07200 Proposed North Elevation P2  
WCRC0-GTA-XX-ZZ-DR-AR-07201 Proposed East Elevation P2  
WCRC0-GTA-XX-ZZ-DR-AR-07202 Proposed South Elevation P2  
WCRC0-GTA-XX-ZZ-DR-AR-07203 Proposed West Elevation P2  
WCRC0-GTA-XX-ZZ-DR-AR-07300 Proposed Section A-A - East - West P2  
WCRC0-GTA-XX-ZZ-DR-AR-07301 Proposed Section B-B - North - South P2  
WCRDC0-GTA-XX-ZZ-DR-AR-07400 Bay Study - Stepney Way / North P2  
WCRDC0-GTA-XX-ZZ-DR-AR-07401 Bay Study - Stepney Way / North P2  
WCRDC0-GTA-XX-ZZ-DR-AR-07402 Bay Study - Stepney Walk/ Main Entrance East P2  
WCRDC0-GTA-XX-ZZ-DR-AR-07403 Bay Study - Newark Street / South P2  
WCRDC0-GTA-XX-ZZ-DR-AR-07404 Bay Study - Newark Street / South P2  
WCRDC0-GTA-XX-ZZ-DR-AR-07405 Bay Study - New Road / West P2  
WCRDC0-GTA-XX-ZZ-DR-AR-07406 Entrance Glazing Assembly P2

#### Plot D1

WCRD1-AAM-XX-B1-DR-AR-07009 Proposed Basement Plan P2  
WCRD1-AAM-XX-00-DR-AR-07100 Proposed Ground Floor Plan P2  
WCRD1-AAM-XX-01-DR-AR-07101 Proposed Level 01 Plan P2  
WCRD1-AAM-XX-02-DR-AR-07102 Proposed Level 02 - 04 Plan P2  
WCRD1-AAM-XX-05-DR-AR-07103 Proposed Level 05 Plan P2  
WCRD1-AAM-XX-06-DR-AR-07104 Proposed Level 06 – 07 Plan P2  
WCRD1-AAM-XX-07-DR-AR-07105 Proposed Level 08 Plan P2  
WCRD1-AAM-XX-08-DR-AR-07106 Proposed Level 09 - 10 Plan P2  
WCRD1-AAM-XX-11-DR-AR-07107 Proposed Level 11 Plan P2  
WCRD1-AAM-XX-12-DR-AR-07108 Proposed Level 12 Plan P2  
WCRD1-AAM-XX-16-DR-AR-07109 Proposed Level 13 - Lower Roof Plant P2  
WCRD1-AAM-XX-RF-DR-AR-07110 Proposed Level 14 - Roof Plan P2  
WCRD1-AAM-XX-ZZ-DR-AR-07200 Proposed North Elevation P2

WCRD1-AAM-XX-ZZ-DR-AR-07201 Proposed East Elevation P2  
WCRD1-AAM-XX-ZZ-DR-AR-07202 Proposed South Elevation P2  
WCRD1-AAM-XX-ZZ-DR-AR-07203 Proposed West Elevation P2  
WCRD1-AAM-XX-ZZ-DR-AR-07301 Proposed Section AA P2  
WCRD1-AAM-XX-ZZ-DR-AR-07302 Proposed Section BB P2  
WCRD1-AAM-XX-ZZ-DR-AR-07303 Proposed Section CC P2  
WCRD1-AAM-XX-ZZ-DR-AR-07304 Proposed Section DD P2  
WCRD1-AAM-XX-ZZ-DR-AR-07400 Bay Study - Stepney Way / South P2  
WCRD1-AAM-XX-ZZ-DR-AR-07401 Bay Study - Hospital Walk / East P2  
WCRD1-AAM-XX-ZZ-DR-AR-07402 Bay Study - Garrod Walk / West P2  
WCRD1-AAM-XX-ZZ-DR-AR-07403 Bay Study - Terrace / East P2  
WCRD1-AAM-XX-ZZ-DR-AR-07404 Bay Study - Terrace & Balconies / West P2  
WCRD1-AAM-XX-ZZ-DR-AR-07405 Bay Study - Stepney Way Main Entrance / South P2  
WCRD1-AAM-XX-ZZ-DR-AR-07400 Bay Study - Stepney Way / South P2  
WCRD1-AAM-XX-ZZ-DR-AR-07401 Bay Study - Hospital Walk / East P2  
WCRD1-AAM-XX-ZZ-DR-AR-07402 Bay Study - Garrod Walk / West P2  
WCRD1-AAM-XX-ZZ-DR-AR-07403 Bay Study - Terrace / East P2  
WCRD1-AAM-XX-ZZ-DR-AR-07404 Bay Study - Terrace & Balconies / West P2  
WCRD1-AAM-XX-ZZ-DR-AR-07405 Bay Study - Stepney Way Main Entrance / South P2

#### Plot D2

WCRD2-AAM-XX-ZZ-DR-AR-07100 Proposed Plans - Basement, Ground and Roof P2  
WCRD2-AAM-XX-ZZ-DR-AR-07201 Proposed Elevations P2  
WCRD2-AAM-XX-ZZ-DR-AR-07202 Proposed Elevations P2  
WCRD2-AAM-XX-ZZ-DR-AR-07301 Proposed Sections P2  
WCRD2-AAM-XX-ZZ-DR-AR-07302 Proposed Sections P2

#### Landscape drawings

WCR00-CML-XX-ZZ-DR-LS-07900 Proposed Public Realm Plan Rev P7  
WCR00-CML-XX-ZZ-DR-LS-07901 Proposed Public Realm Context Plan Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07902 Proposed Landscape Levels Plan Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07903 Proposed Paving Arrangement Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07904 Proposed Boundary Treatments, Kerbs & Edges Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07905 Proposed Furniture and Fixtures Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07906 Proposed Tree Removal Plan Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07907 Proposed Tree Planting Plan Rev P6  
WCR00-CML-XX-ZZ-DR-LS-07908 Proposed Planting Plan Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07909 Proposed Growing Medium Plan Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07910 Land Ownership Plan Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07911 Proposed Urban Greening Factor Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07913 Proposed Public Realm (Outside Redline) Rev P4  
WCR00-CML-XX-ZZ-DR-LS-07914 Phasing Plan P4

#### **Other application documents**

##### **Original Submission**

Planning Statement including Draft S106 HoT's  
Air Quality Assessment  
Biodiversity Survey and Report and Ecology Statement  
Construction Environmental Management Plan  
Daylight/Sunlight Assessment  
Regeneration/ Economic Impact/ Community Benefits Statement  
Energy Assessment and Overheating Mitigation  
Environmental Statement, including Townscape and Visual Impact Assessment  
Fire Statement  
Flood Risk Assessment  
Utilities Statement  
Health Impact Assessment

Heritage Statement  
Land Contamination Assessment  
Noise Impact Assessment and Mitigation Details  
Statement of Community Involvement  
Site Waste Management Plan  
Drainage Strategy and SuDS Report  
Transport Assessment including details of servicing, parking and access  
Travel Plan  
Arboricultural Impact Assessment and Method Statement  
Ventilation and Extraction Details  
Wind Impact Assessment  
Whole Life Carbon Assessment  
Circular Economy Statement (Rev 07)  
Sustainability Statement  
Equalities Impact Assessment

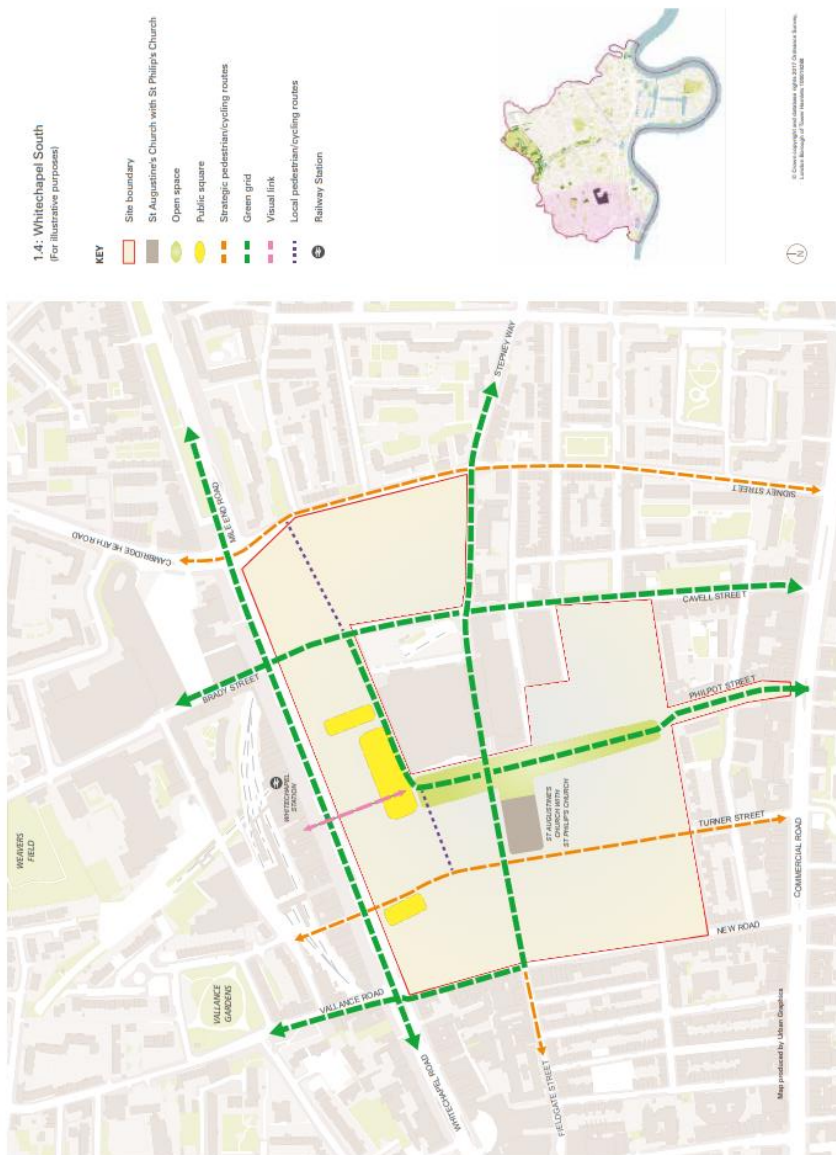
**Addendum**

Planning Statement Addendum  
Heritage Impact Statement Addendum  
Environmental Statement Addendum, including Townscape and Visual Impact Assessment Addendum  
Site Waste Management Plan Addendum  
Travel Plan Addendum  
Transport Assessment Addendum  
Drainage and SuDS Strategy Addendum  
Flood Risk Assessment Addendum  
Overshadowing Assessment Addendum  
Daylight and Sunlight Assessment Addendum  
Energy Assessment Addendum  
Whole Life Carbon Assessment Addendum  
Circular Economy Statement Addendum  
Sustainability Statement Addendum  
Fire Statement Addendum  
Utilities Statement Addendum

## APPENDIX 2

# SELECTION OF APPLICATION PLANS AND IMAGES AND BACKGROUND INFORMATION

Whitechapel South site allocation extracted from Local Plan (2020)



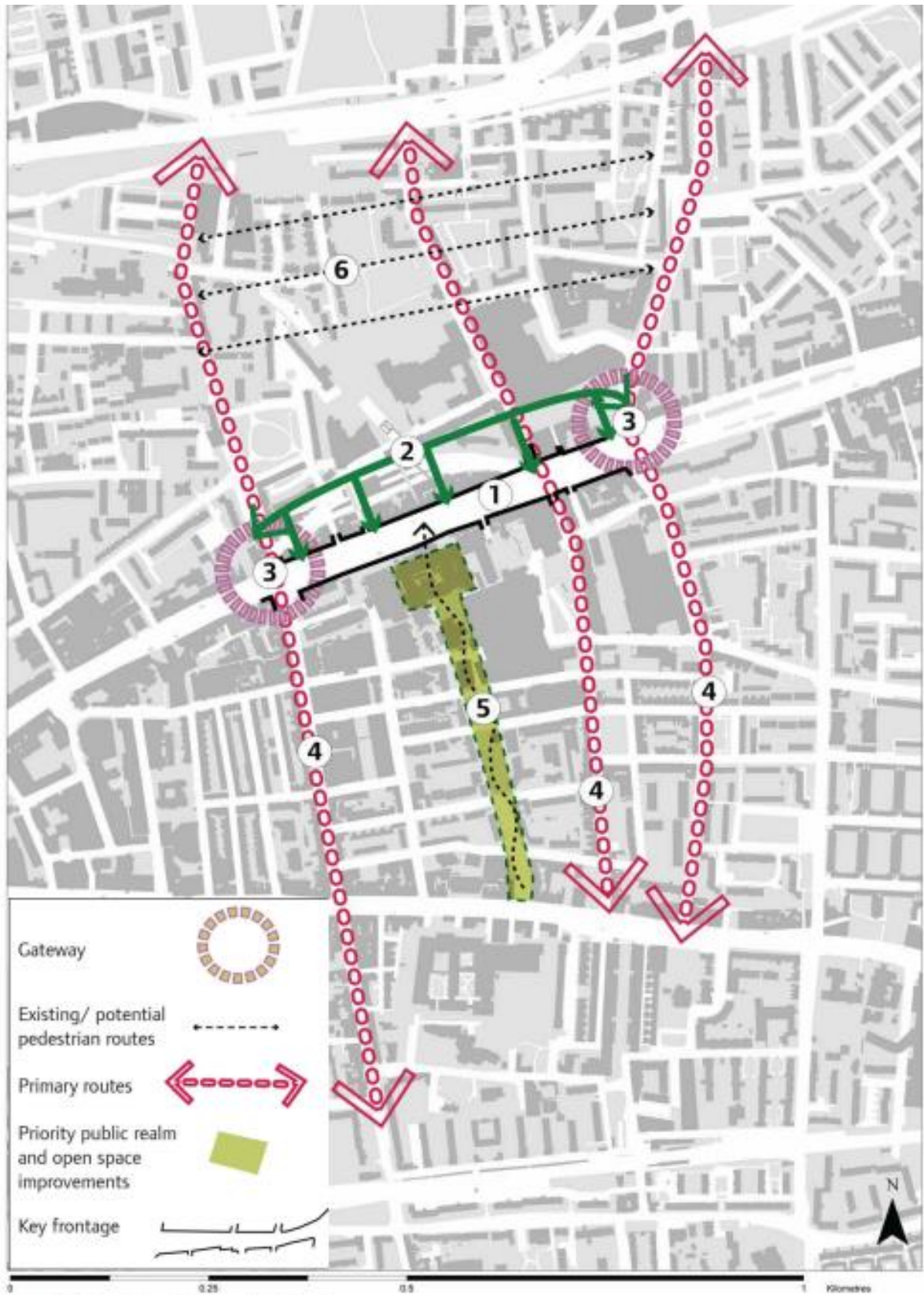
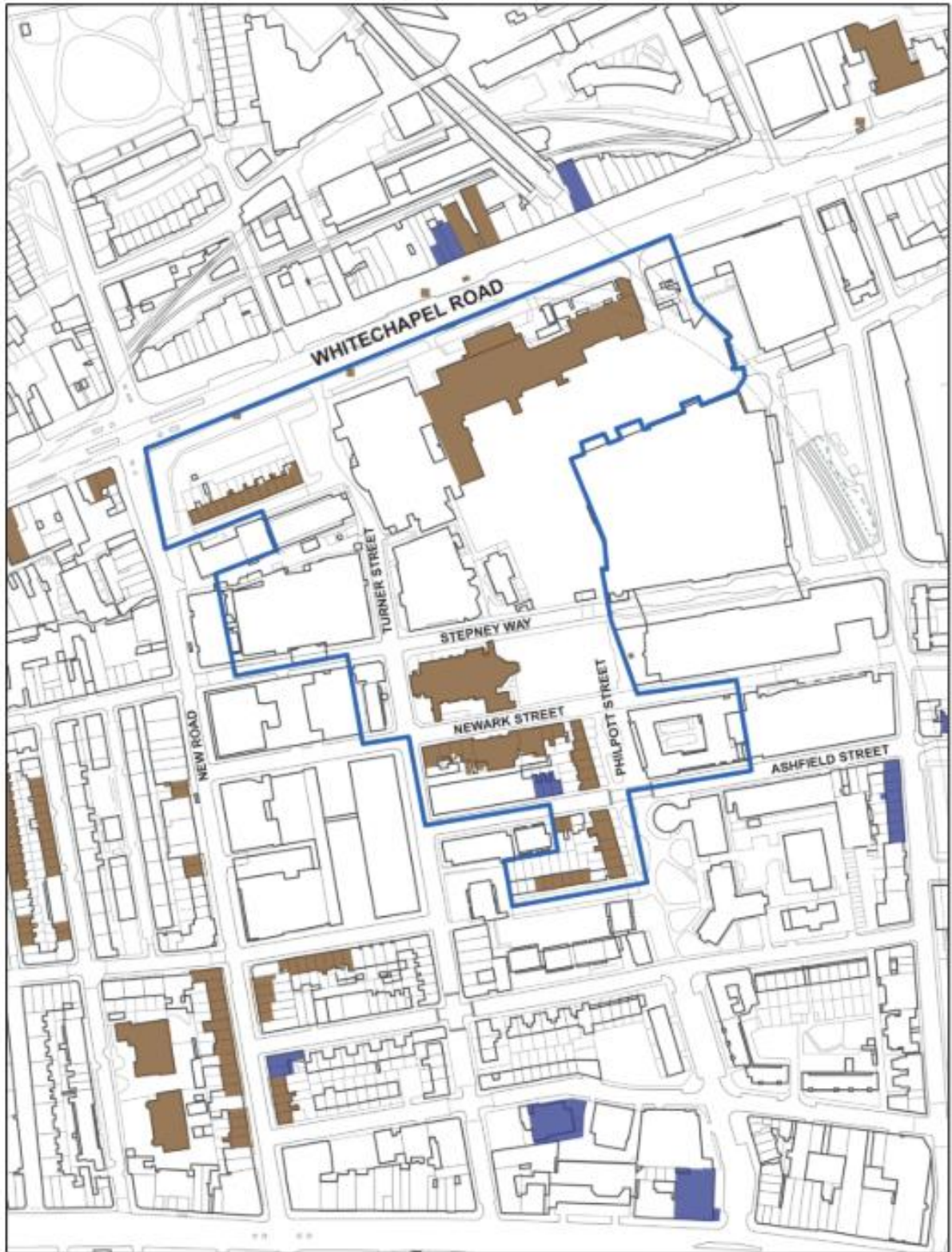


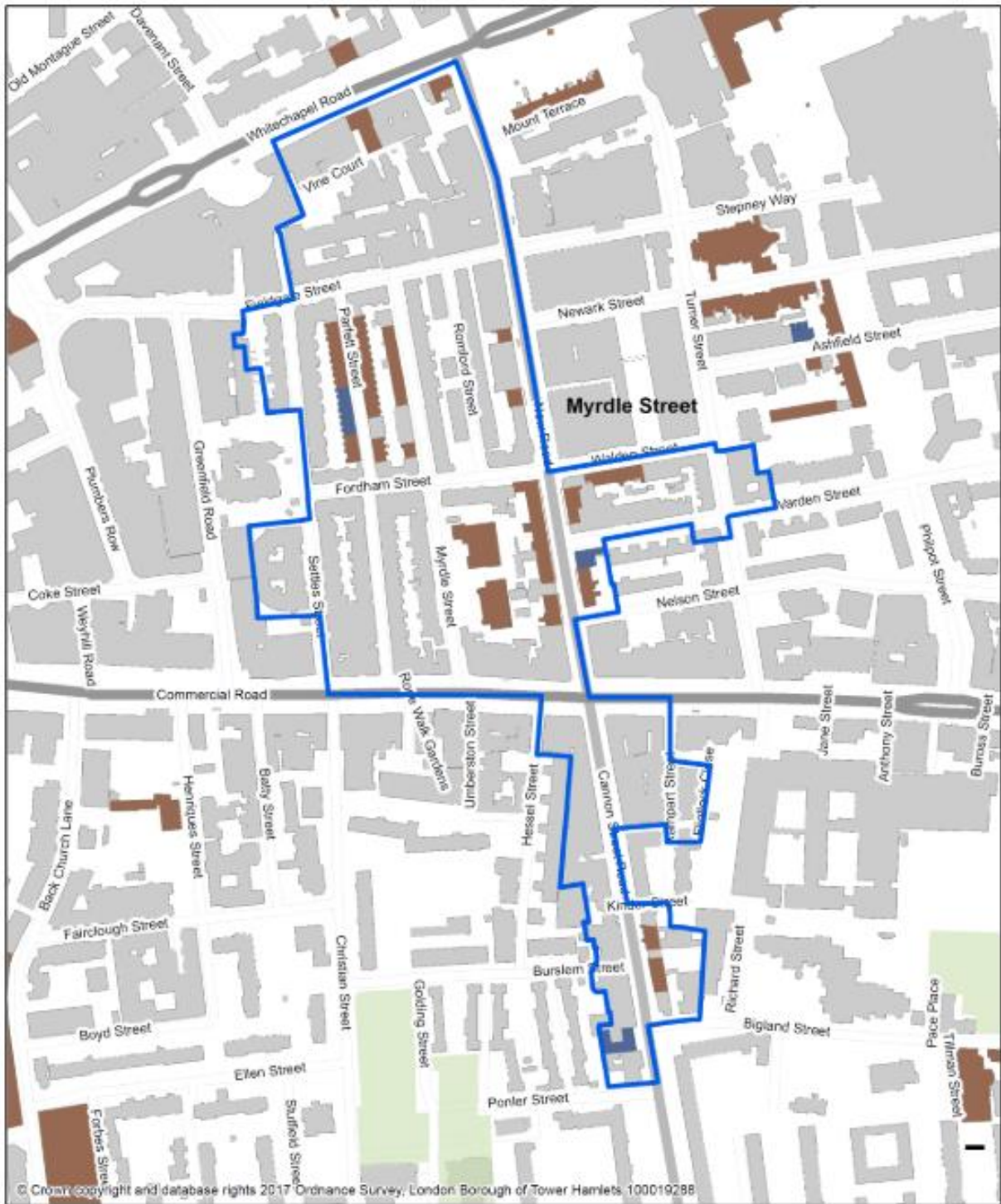
Figure 5.16 Strategic principles for Whitechapel



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## FORMER LONDON HOSPITAL CONSERVATION AREA

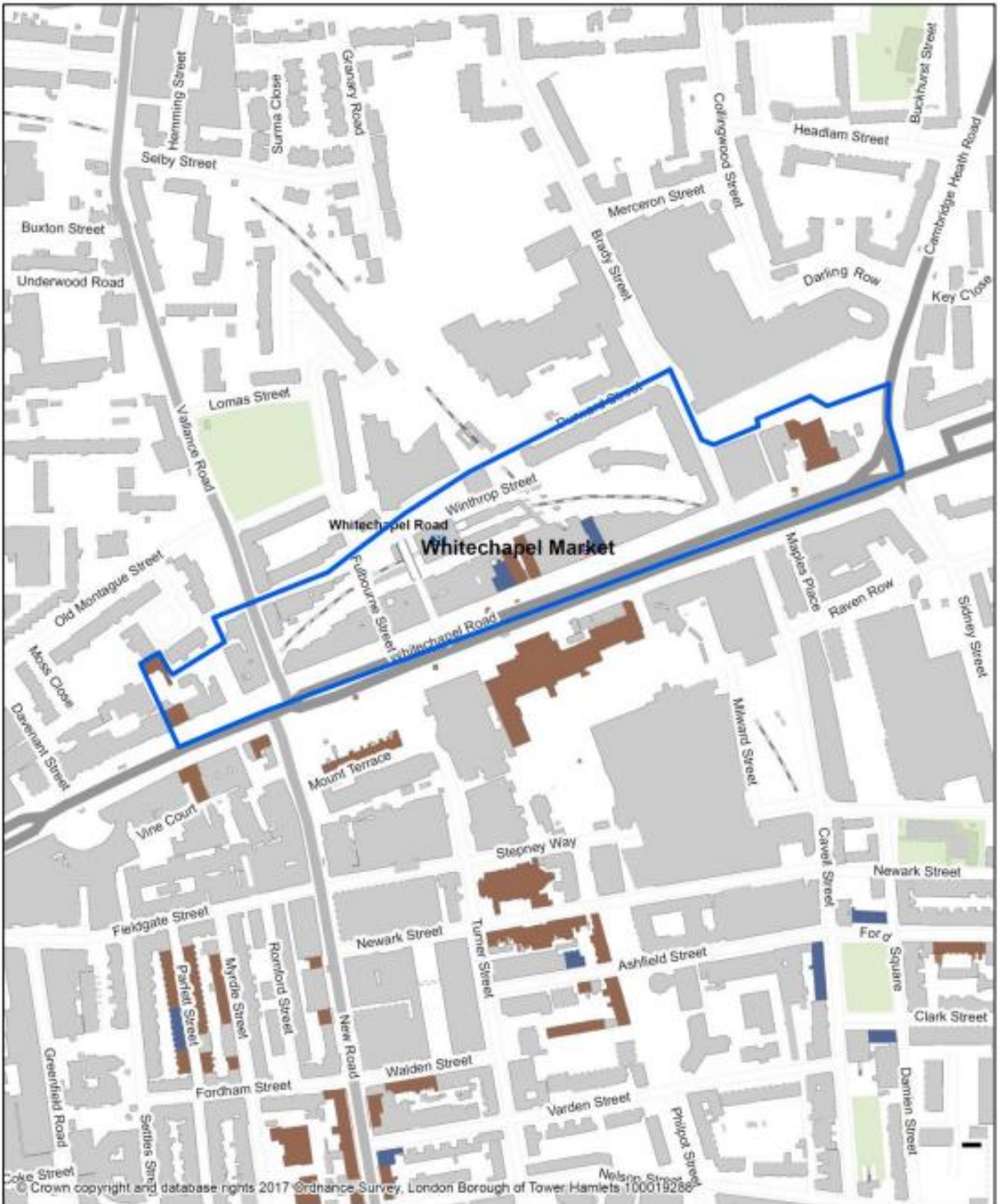
-  Conservation Area
-  Statutory Listed Buildings
-  Locally Listed Buildings



### MYRDLE STREET CONSERVATION AREA

- Conservation Area
- Statutory Listed Buildings
- Locally Listed Buildings





## WHITECHAPEL MARKET CONSERVATION AREA

- Conservation Area
- Statutory Listed Buildings
- Locally Listed Buildings

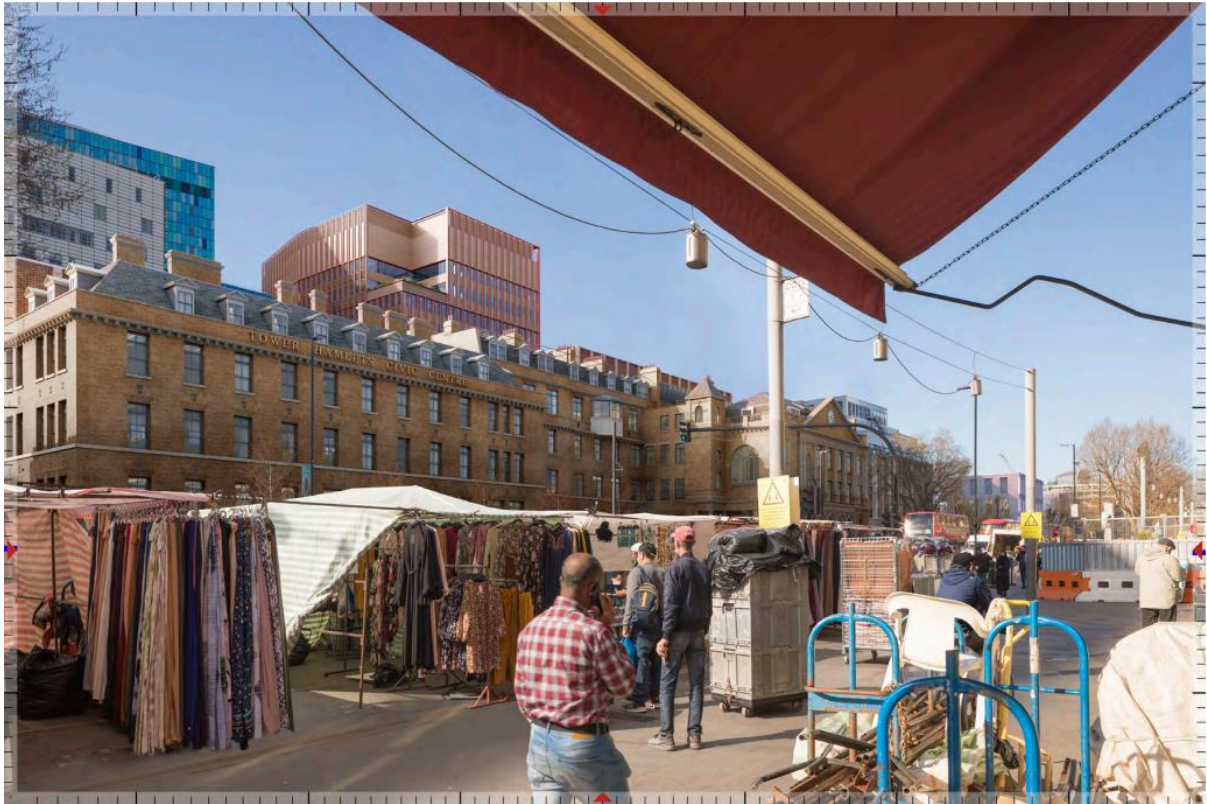




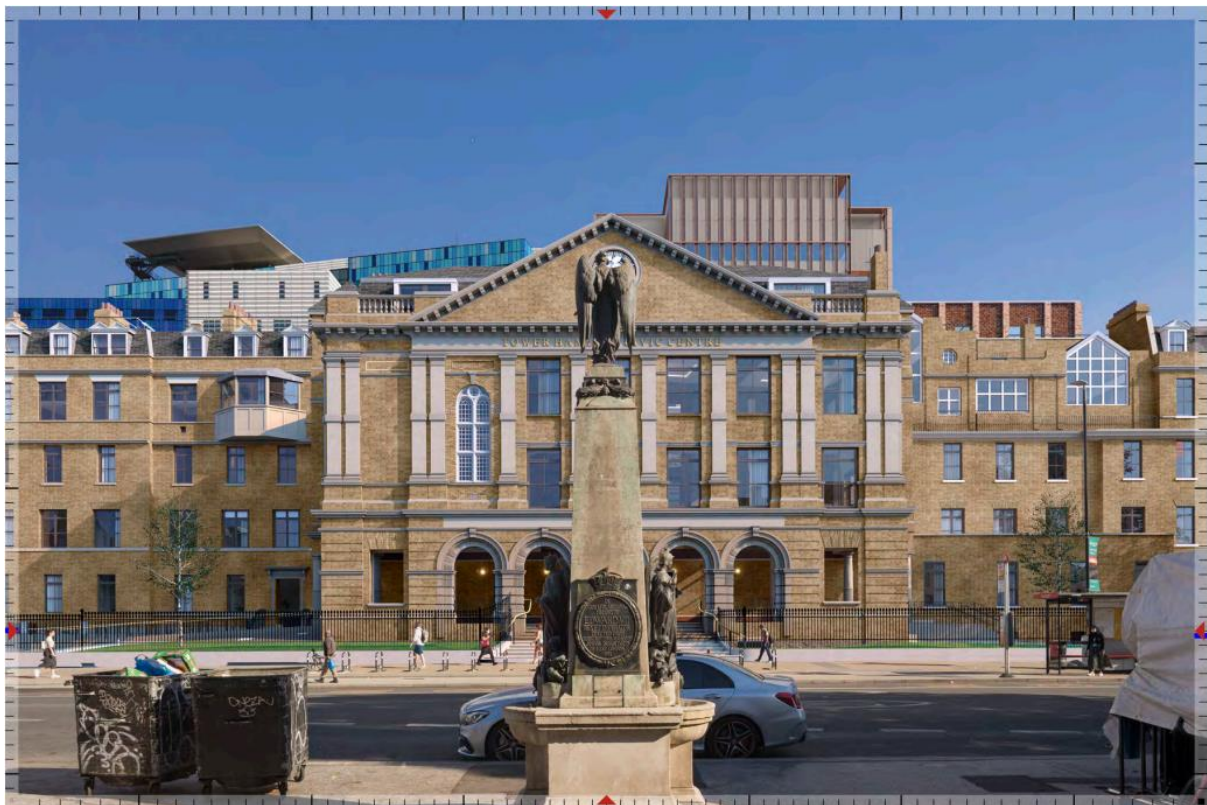
**View 35 – Existing – Turner Street / Ashfield Street**



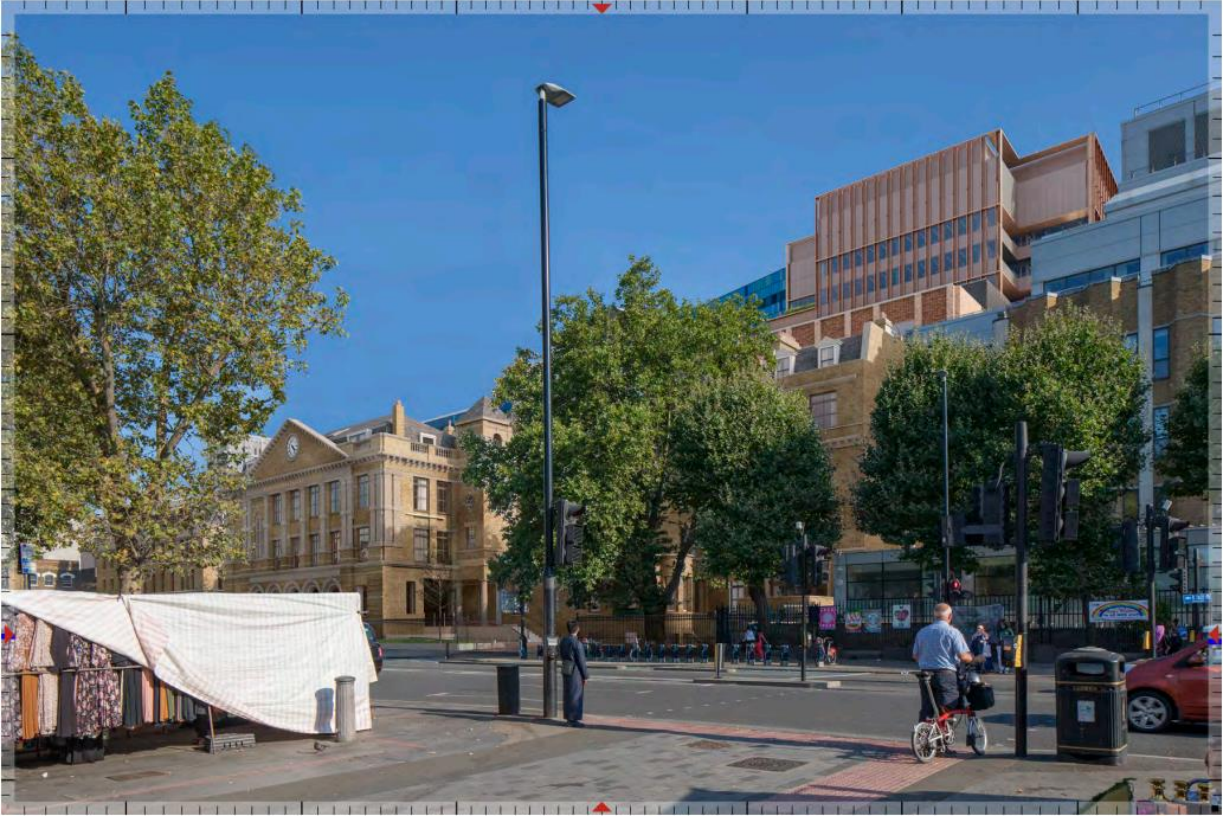
**View 35 – Proposed – Turner Street / Ashfield Street**



**View 41 – Proposed – Whitechapel Road, by number 291**



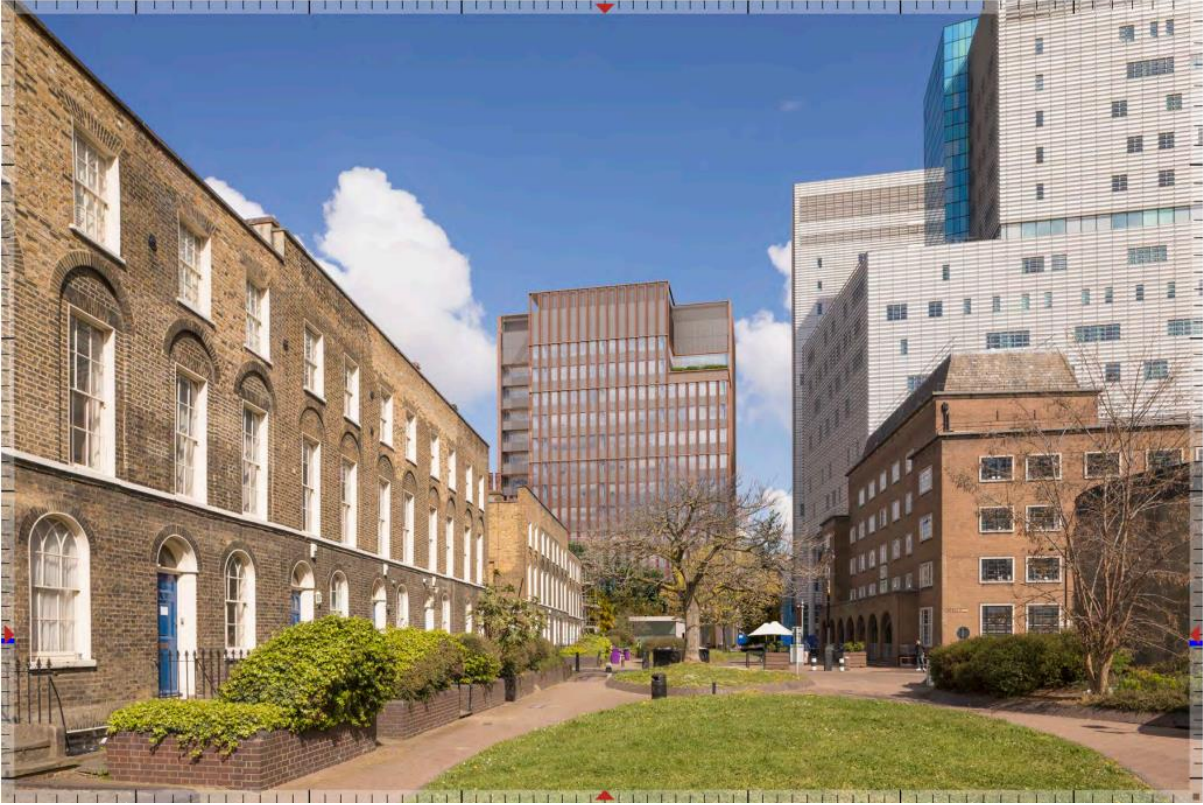
**View 44 – Proposed – Whitechapel Road, by Eduard VII monument**



**View 45 – Proposed – Whitechapel Road, Junction with Court Street**



**View 45 – Proposed, winter – Whitechapel Road, Junction with Court Street**



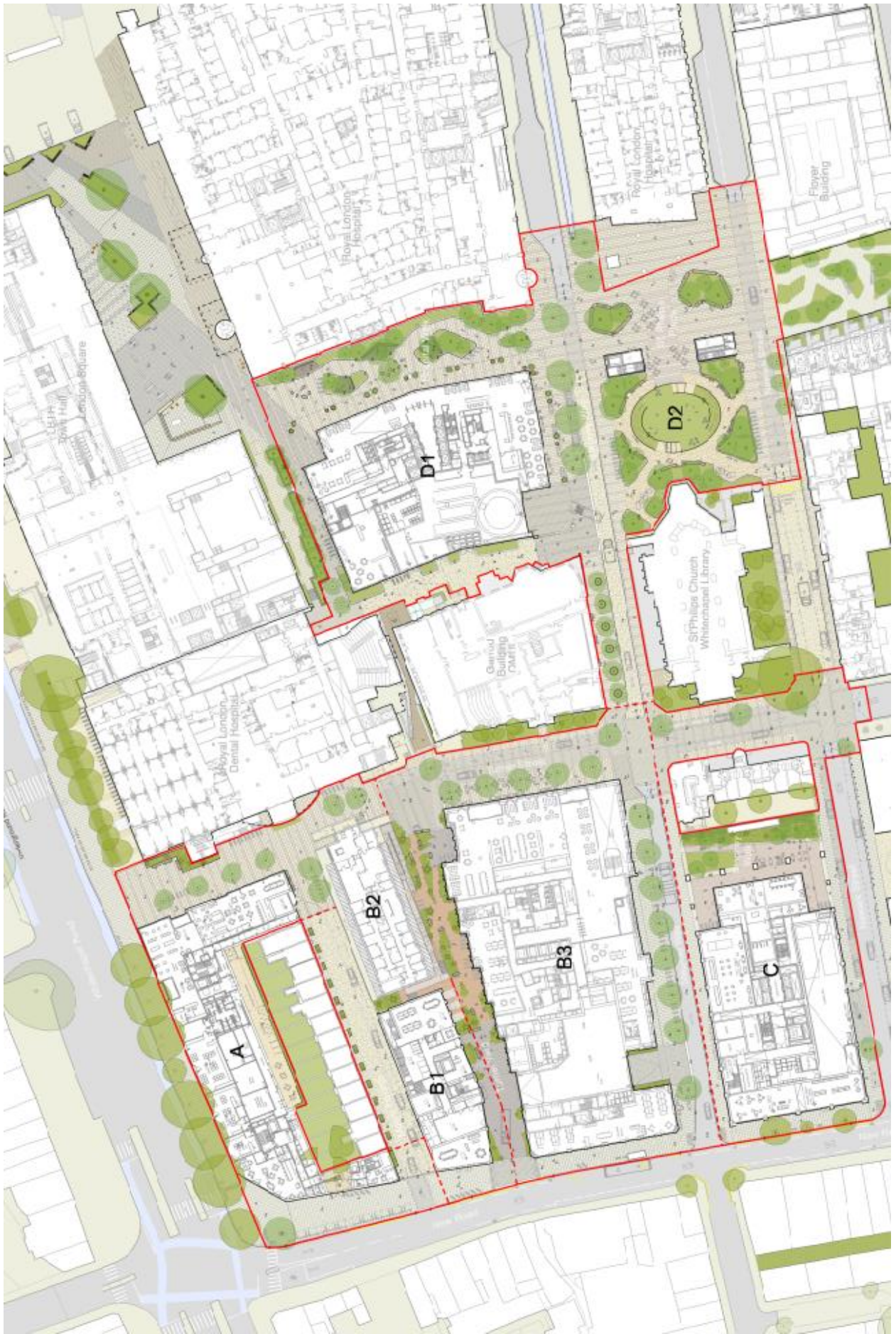
**View 63 – Philpot Street / School of Community and Health Sciences**



**View 64 - Green Spine, south of Newark Street**



**View 65 – Newark Street, by Floyer Building**



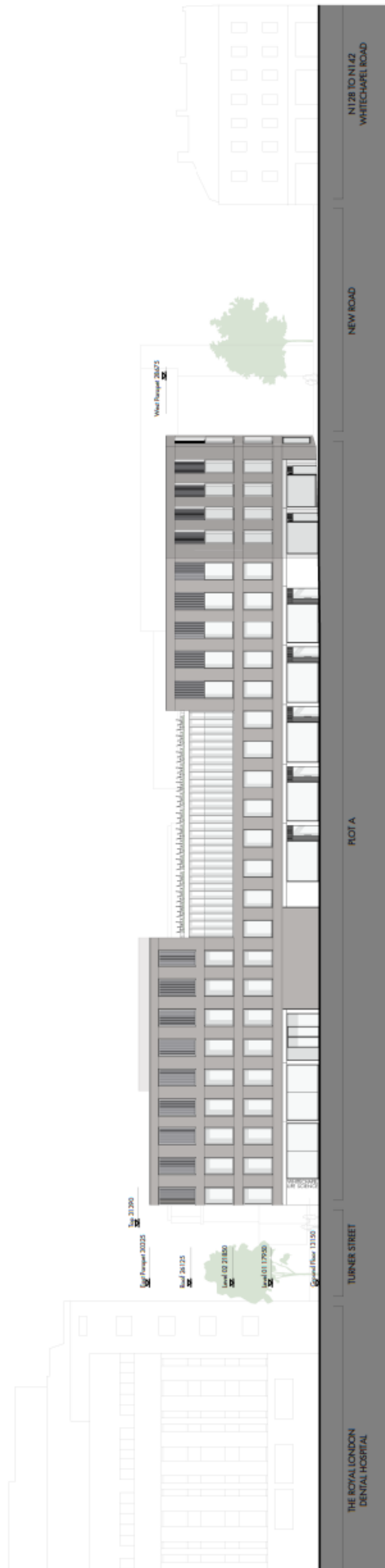
Proposed public realm plan



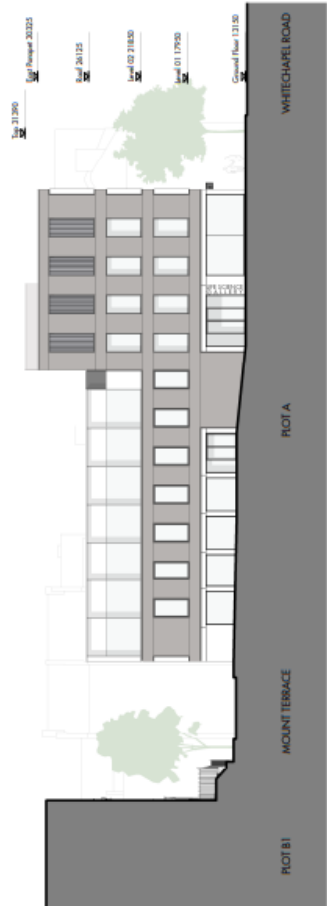


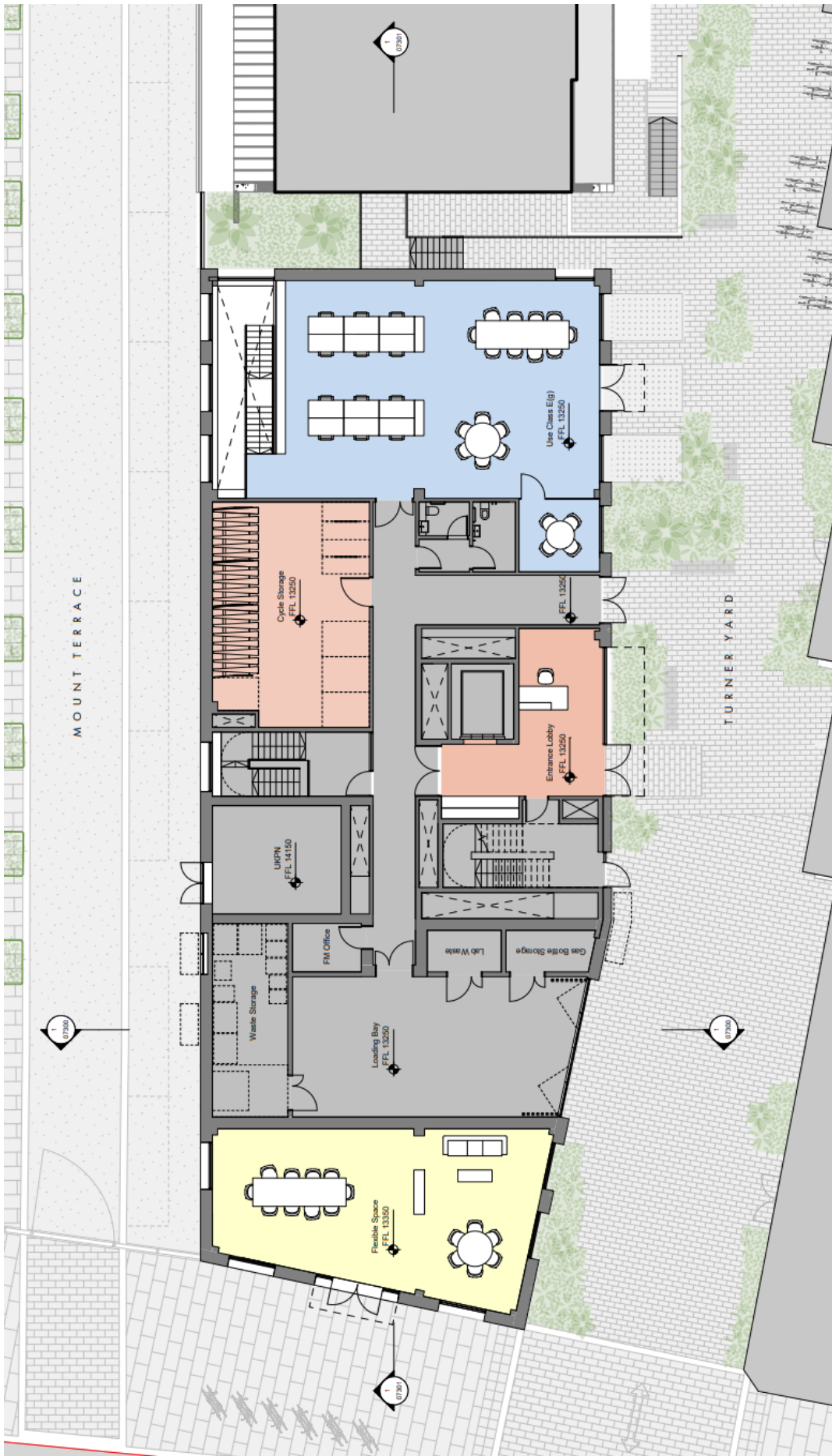
Plot A ground floor plan

Plot A north, west and east elevations



1 Proposed North Elevation  
1:200

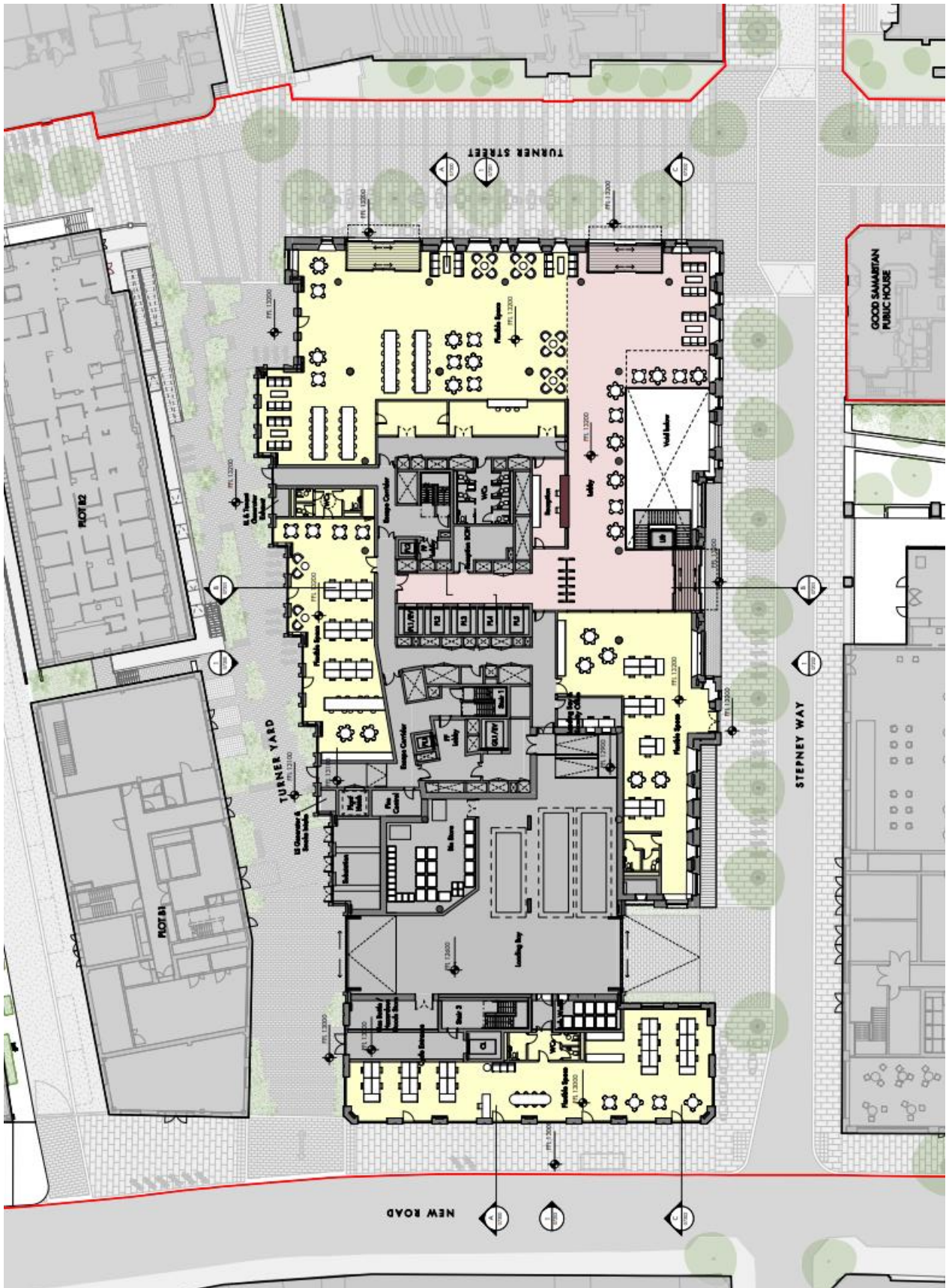




Plot B1 ground floor plan



Plot B1 north and south elevations



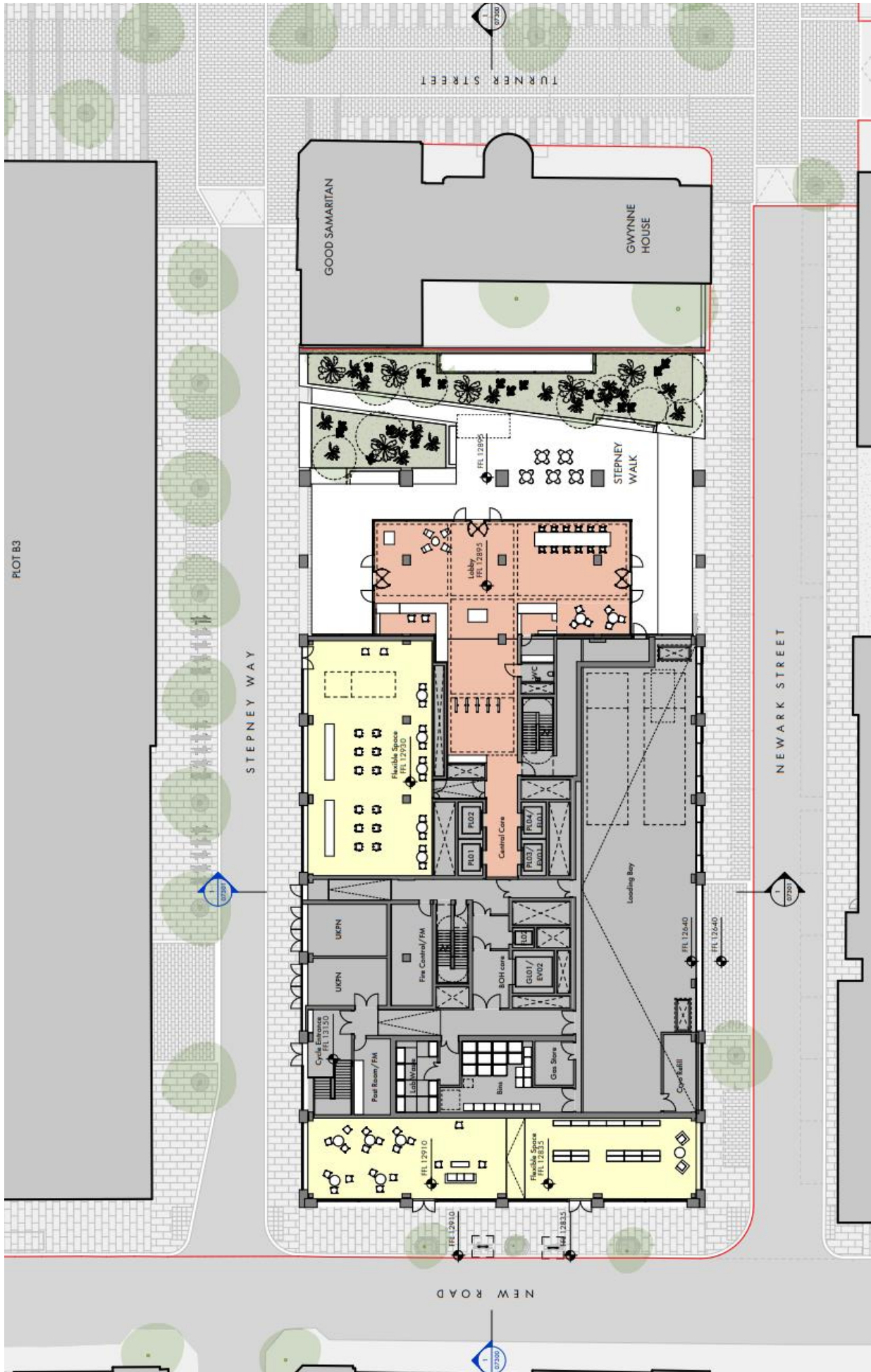
Plot B3 ground floor plan

Plot B3 proposed south elevation



Plot B3 proposed east elevation





Plot C proposed ground floor plan



Plot C proposed east elevation



Plot C proposed south elevation

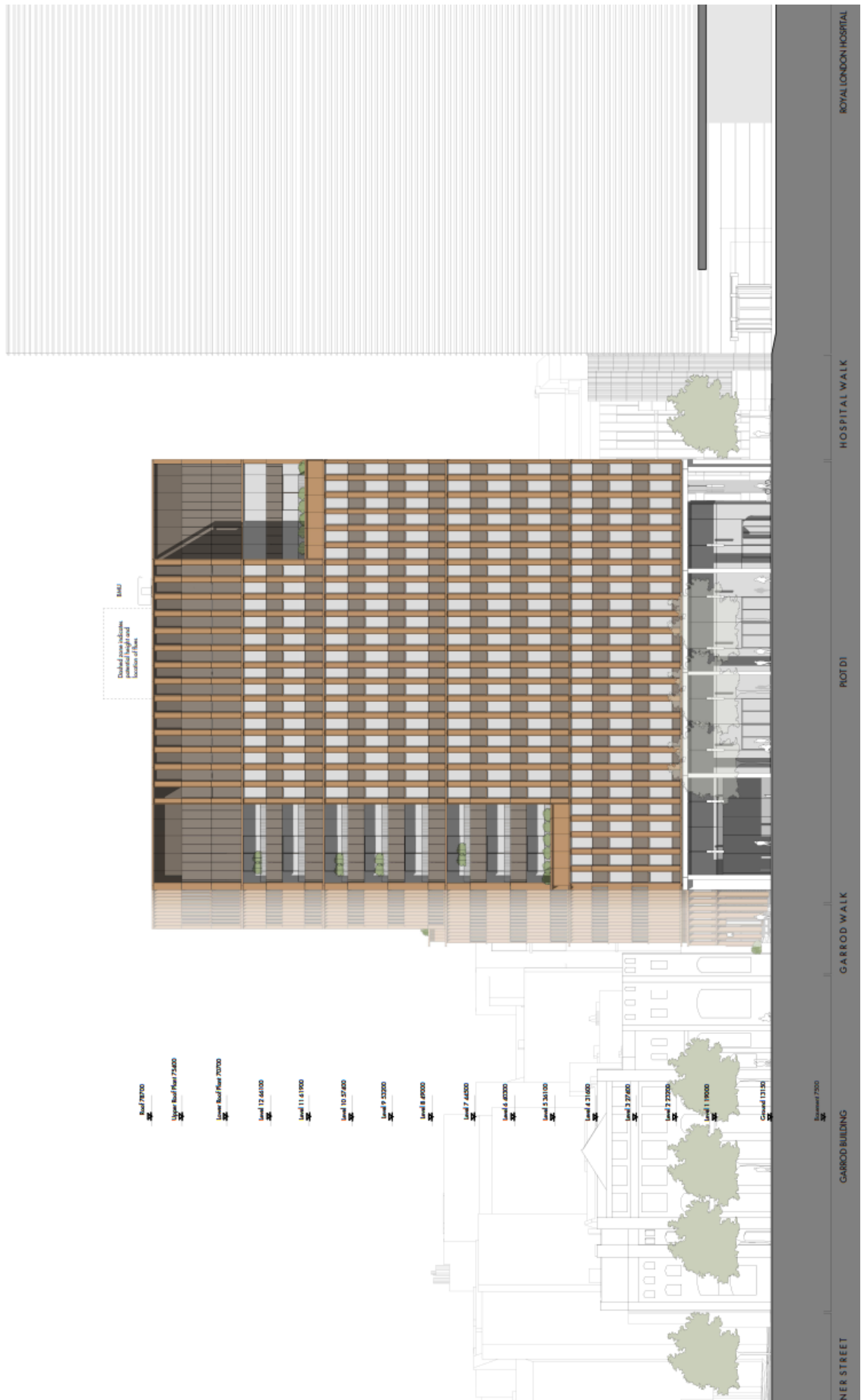




Plot D1 north elevation



Plot D1 proposed south elevation



Plot D2 elevations

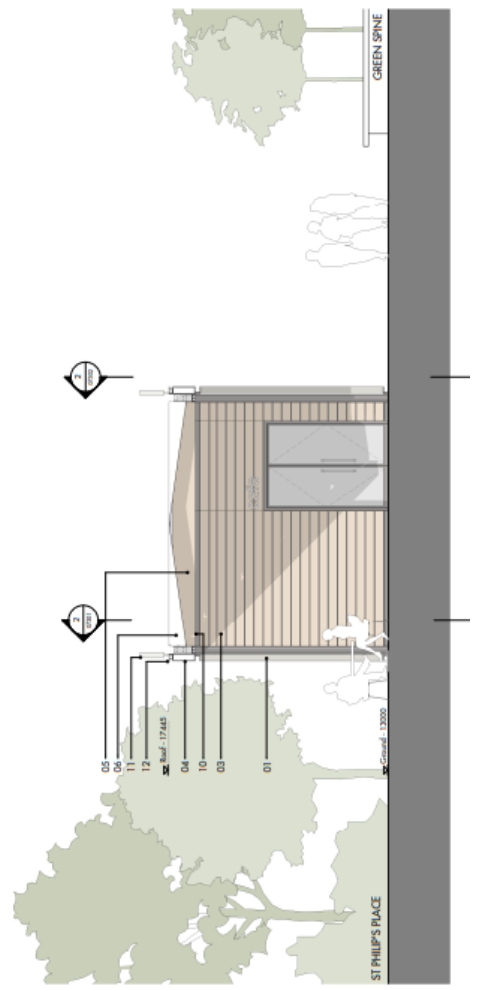
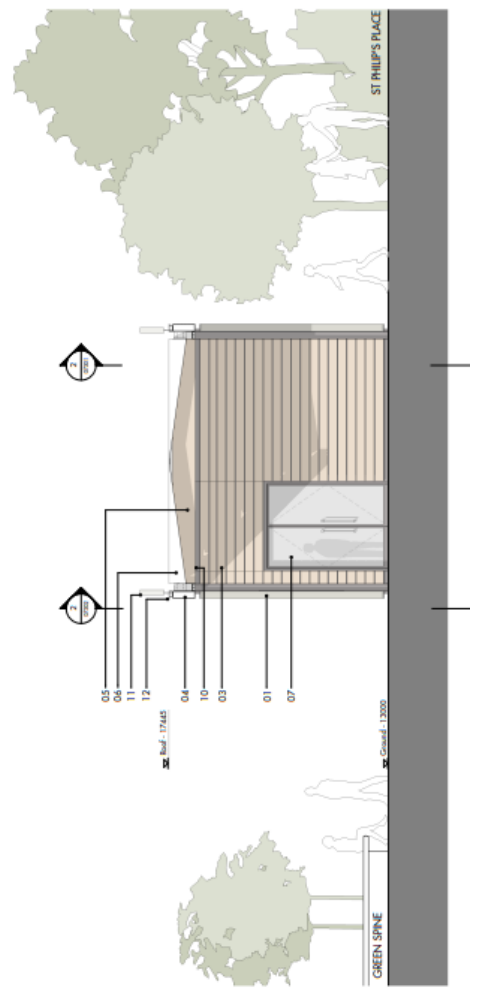
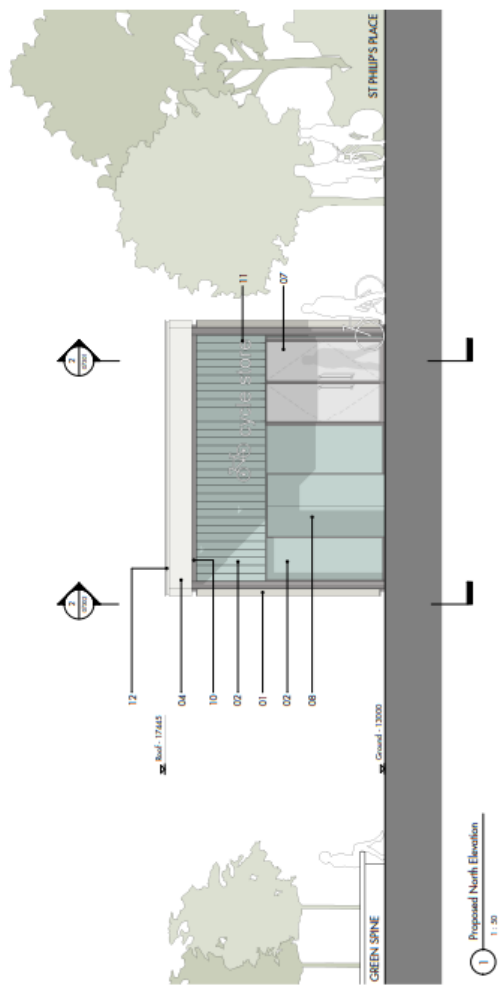
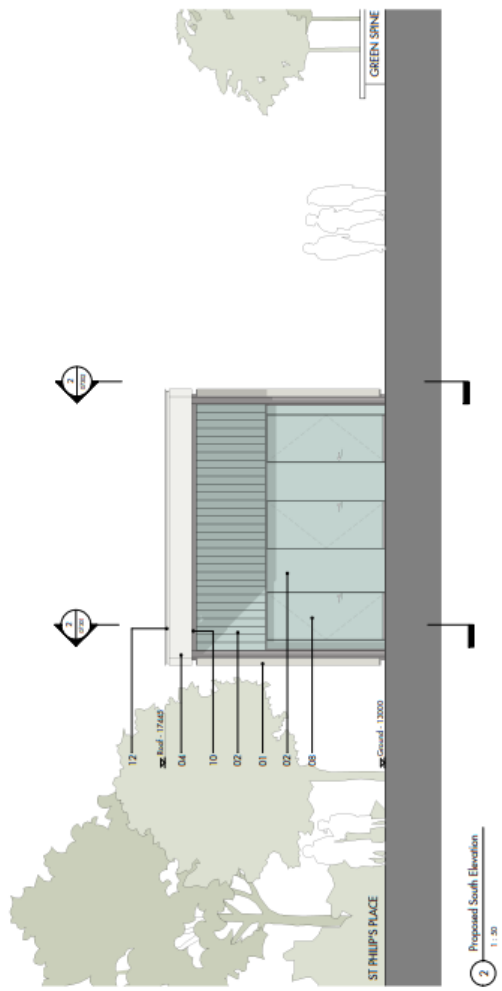
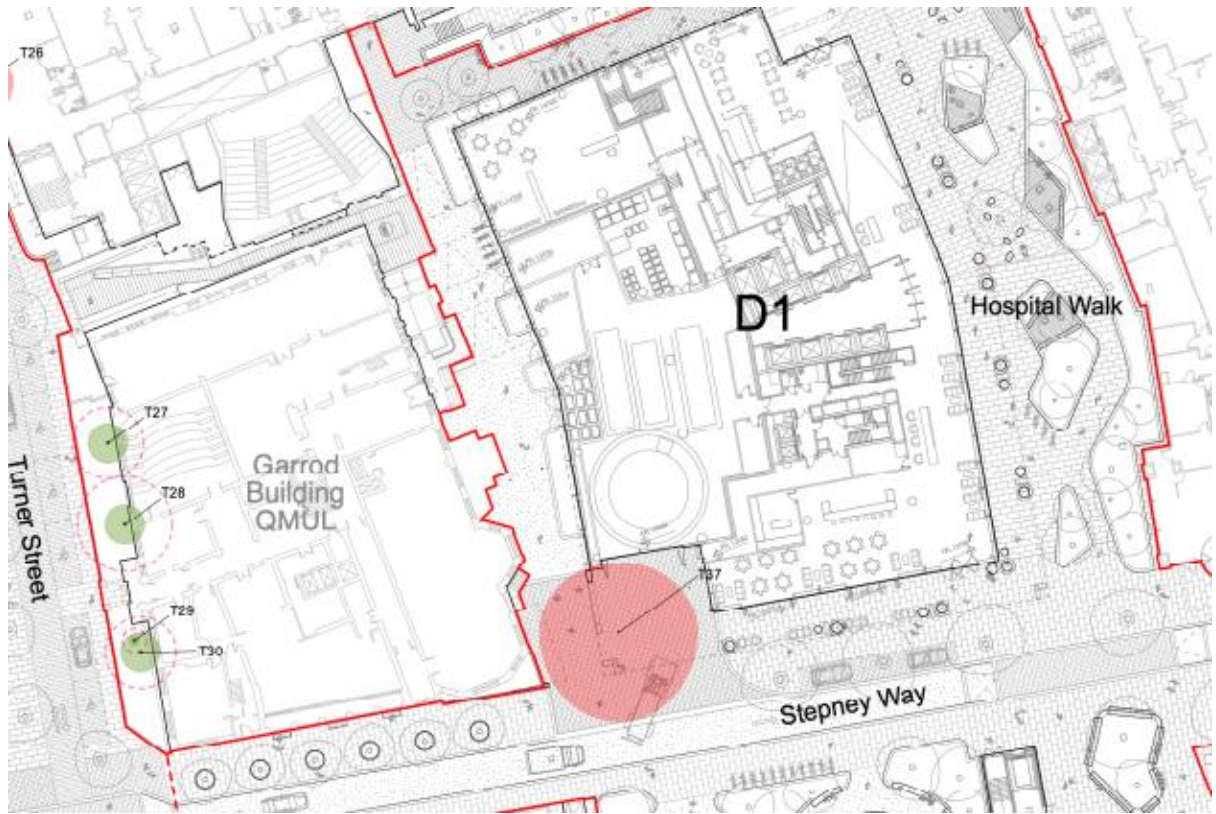




Figure 26: Scenario 01: Daylight Significance Criteria



Figure 27: Scenario 02: Sunlight Significance Criteria



Trees to be removed shown in red