

20 January 2016

**Whitechapel Estate, between Varden Street and
Ashfield Street, E1****in the London Borough of Tower Hamlets****planning application no. PA/15/02959****Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of all existing buildings and redevelopment to provide 12 buildings ranging from ground plus 2 - 23 storeys (a maximum 94m AOD height), comprising 470 residential dwellings (class C3), specialist accommodation, offices (class B1), flexible office and non-residential institution (Class B1/D1), retail (class A1 - A3), car parking, cycle parking, hard and soft landscaping and other associated works.

The applicant

The applicant is **Londonewcastle**, and the architects are **PLP** and **Adjaye Associates**.

Strategic issues

The principle of the housing-led mixed-use redevelopment of this site within the **City Fringe Opportunity Area** is supported. However, there are a number of significant outstanding strategic planning concerns relating to **employment and mixed use, specialist housing, affordable housing, housing, urban design, inclusive design, climate change** and **transport**.

Recommendation

That Tower Hamlets Council be advised that, whilst the principle of a residential-led mixed use development of the site is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 84 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 30 October 2015 the Mayor of London received documents from Tower Hamlets Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- Category 1A: *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”.*
- Category 1C: *“Development which comprises or includes the erection of a building more than thirty metres high and outside the City of London”.*

3 Once Tower Hamlets Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The 1.27 hectare site is located to the south of the Whitechapel Road and the Royal London Hospital (RLH). There are 12 buildings across the site, mainly post-war infill development with a mixture of uses, predominantly offices and housing, much of which is associated with the nearby healthcare institutions. The site comprises the majority of land within the city block bound to the north by Ashfield Street, Cavell Street to the east, Turner Street to the west and Varden Street to the north. The site is bisected by Philpot Street, which is a pedestrian and cycle connection between Whitechapel and surrounding areas to the south.

7 The surrounding area is characterised by a mixture of uses and building styles, with a number of uses associated with the RLH or other medical institutions. The site is partly located within Myrdle Street Conservation Area to the west and London Hospital Conservation Area to the north east. There are a number of listed buildings within the immediate vicinity of the site, including within the city block. The site is also within the boundary of the City Fringe Opportunity Area Planning Framework (2015) and is an identified site within the Whitechapel Vision Masterplan (2013).

8 Both the A11 (Whitechapel Road) 200 metres to the north and A13 (Commercial Road) 100 metres to the south form part of the Transport for London Road Network (TLRN). The nearest section of the Strategic Road Network (SRN) is Aldgate High Street, more than 950 metres away. Cycle Superhighway 2 (CS2) can be accessed from the A11. The nearest station to the site is Whitechapel, located 250 metres to the north, which provides access to the District, Hammersmith & City and Overground services. From 2018 it will also be served by Crossrail. Shadwell Docklands Light Railway (DLR) is located 450 metres to the south. Five bus services operate along Whitechapel Road and a further four routes can be accessed from Commercial Road. As such the site has an excellent public transport accessibility level (PTAL) ranging from 5 to 6a (out of 1 to 6, where 6 is the highest). The Whitechapel area is also served by the Mayor’s Cycle Hire scheme. The nearest docking station is 70 metres to the south at the junction of Philpot Street and Nelson Street, providing access to 30 docking points. Other docking stations are also nearby at New Street and Watney Market.

Details of the proposal

9 Londonewcastle (the applicant), is seeking full planning permission for the redevelopment of the site with 12 new buildings (blocks A to I) up to 23 storeys, comprising a mixture of uses including

a total of 470 residential dwellings (including specialist housing), offices, retail and associated parking. The buildings would either front onto the surrounding streets or would be arranged around central gardens and open spaces, including a central green spine (Philpot Street). A summary of each block is set out below:

Block A: 11 residential units for shared ownership in a four storey block fronting Ashfield Street.

Block B1: 25 private residential units, a ground floor retail unit and basement energy centre in a nine storey block fronting Turner Street.

Block B2: 15 private residential units in a seven storey block fronting Turner Street, including a new pedestrian link between Blocks B1 and B2 into the site (reinstatement of Walden Street).

Block C: 9 residential units for social rent and 74 specialist residential units in a five storey block fronting Varden Street.

Block D1: 31 private residential units and a ground floor retail unit in a ten storey block on the corner of the reinstated Walden Street and green spine.

Block D2: 6 private residential units in a three storey block fronting the reinstated Walden Street.

Block E: 88 private residential units, a ground floor restaurant unit and communal gym facility in a 20 storey block on the corner of Varden Street and the green spine.

Block F: 17 apartments for social rent in a five storey block fronting Varden Street.

Block G: 33 apartments for social rent in an eight storey block behind Block F.

Block Ha: 12 private residential units in a four storey block behind Block Hb and accessed via an alleyway from Ashfield Street.

Block Hb: B1 office and flexible D1 floorspace totalling 2,803 sq.m. in a six storey block fronting Ashfield Street.

Block I: 149 private residential units in a 23 storey block fronting Ashfield Street.

Case history

10 The application considered here was subject to formal pre-application discussions with GLA officers, with a formal pre-application meeting being held on 12 June 2014 and a follow-up meeting on 1 October 2014. GLA officers supported the principle of inclusion of residential and commercial uses as part of a high density mixed-use development proposal, including re-provision of office space. The key strategic concerns raised included the need to secure the Whitechapel life science cluster, the re-provision of staff accommodation, affordable housing and the height of the two taller elements of the scheme.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Mix of uses London Plan; City Fringe OAPF

- Housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Social Infrastructure SPG*
- Affordable housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy*
- Density *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy*
- Urban design and heritage *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings/views *London Plan; London View Management Framework SPG*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport and parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Crossrail SPG; Mayoral Community Infrastructure Levy*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Tower Hamlets Council's Core Strategy (2010) and Managing Development Document (2013), and the London Plan (Consolidated with Alterations since 2011). The draft Minor Alterations to the London Plan (2015), the City Fringe Opportunity Area Planning Framework (2015), the Council's Whitechapel Vision Masterplan Supplementary Planning Document (2013), and the National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, are also relevant material considerations.

Principle of development and land use mix

13 The site is within the outer core of the City Fringe Opportunity Area and as per London Plan Policy 2.13 should seek to maximise residential and non-residential output and densities and contain a mix of uses. In particular, development proposals are expected to integrate with the surrounding area to support wider regeneration and improvements to environmental quality. Annex 1 of the London Plan states that new developments in the City Fringe Opportunity Area have the scope to deliver an indicative capacity of 70,000 new jobs and a minimum of 8,700 new homes. The City Fringe Opportunity Area Planning Framework (CFOAPF) sets out how London Plan policies are to be applied in the area in order to achieve the vision and objectives developed in partnership with the London boroughs of Islington, Hackney and Tower Hamlets. The CFOAPF identifies Whitechapel as having significant opportunity to contribute towards London's life science offer, noting good transport links and the presence of important institutions nearby, including Queen Mary University, the Royal London Hospital and the Blizzard Centre. A core objective of the CFOAPF is to bring forward significant new workspaces and a world class research cluster, through the delivery of the life sciences campus on land to the south of Whitechapel Road (para 5.93).

14 The CFOAPF and the Whitechapel Vision Masterplan (WVM) both set out what redevelopment of this site is expected to deliver, principally to contribute towards the life science cluster, as well as delivering higher density, better quality homes, set around a new green spine of open space. In terms of the mix of uses, the WVM principally seeks to deliver a high density residential quarter with family, affordable and specialist housing, along with an increased presence of medical, education and research institutions to contribute to the new life science campus. The principle of the proposed residential-led mixed use development of the site is generally supported in line with the above objectives. There are however a number of strategic concerns with regard to the

provision of certain land uses that will need to be resolved before the application is referred back to the Mayor at Stage II, these are set out below.

Employment and life science uses

15 As mentioned, the proposals are within the outer core area as identified in the CFOAPF, where demand from small and medium sized enterprises (SMEs) is expected to continue, along with increased demand from the digital-creative cluster. Excluding consideration of the temporary office space on site, the proposal would result in an increase in office accommodation of 482 sq.m. and it is expected that the number of jobs will increase, which is welcomed. At pre-application stage, the applicant was encouraged to engage with potential end users of this space, such as Queen Mary University, to explore the possibility that some of this floorspace could be used for a specific life-sciences use, such as biomedical incubation space. It is not evident from the submission that the space has been designed to accommodate such uses, which is a requirement of this scheme given the key objective of the CFOAPF and WVM for this site contribute towards the life science campus in Whitechapel. The applicant is requested to provide an update on these discussions, along with further explanation of how the B1 space within Block Hb could be configured to accommodate, and be affordable for, such specialist uses.

16 The proposal includes new residential in close proximity to existing (and potentially proposed) life science uses, many of which by their nature could give rise to amenity impacts on future residents of the scheme. Given the strategic priority to promote the life science cluster, the applicant should demonstrate that the proposed residential uses would be able to coexist with existing research and medical uses in the surrounding area.

17 The proposal also includes an area of flexible B1/D1 floorspace in the basement of Block Hb, which has the potential to accommodate a 112 seat auditorium for teaching purposes associated with the Royal London Hospital (RLH). Should RLH not take up the space, it could be used for additional B1 office space, to further contribute towards the life science campus. This is supported and the mechanism for the provision of the auditorium space should be secured through the S106 agreement.

Retail

18 The CFOAPF and WVM recognises that small scale retail will be necessary to provide active frontages, particularly along the central green spine of the scheme. The scheme proposes an increase of approximately 491 sq.m. of retail across the site, comprising a mix of cafes and shops. The provision of retail space is supported as part of this mixed use scheme and it is noted that much of this space would front onto the central green spine open space, which is welcomed. The applicant should however demonstrate how the proposals will support the objectives of the CFOAPF with regard to retail floorspace, particularly in terms of affordable retail units.

Loss of existing non-residential institutions

19 There is currently 340 sq.m. of D1 non-residential institutional space on the site, in the form of a vacant and unused police interview suite of 68 sq.m. and a ICT training centre located within a temporary building. The planning history suggests that these uses are temporary in nature and were expected to be provided within the new RLH building once this was completed. The applicant is requested to provide confirmation that these uses have been satisfactorily accommodated elsewhere or re-provided for alternative life science uses, in order to justify the loss of this floorspace on site.

Specialist housing

20 London Plan Policy 3.14 addresses sites with existing housing stock and recognises that staff accommodation, with dedicated homes for employees such as nurses, is a valuable and finite resource that may be threatened by higher value uses. There is an ongoing need for such accommodation across London and specifically in locations such as this, which are close to large NHS facilities. As such, proposals that involve a net loss of staff accommodation will be resisted. Table 1, below, sets out a breakdown of existing and proposed specialist accommodation, based on figures provided by the applicant:

accommodation type	existing		proposed		change	
	sq.m.	units	sq.m.	units	sq.m.	units
student and nursing staff	3,101	117	3,096	74	-5	-43
short term staff and patient	2,362	84	0	0	-2,362	-84
total	5,463	201	3,096	74	-2,367	-127

Table 1: staff accommodation schedule (floorspace figures are NIA)

21 The breakdown shows that there would be a net loss of 43 specialist student and staff housing units. Whilst it is noted that the replacement units would be of better quality and size, this is a significant reduction and is not compensated for by uplift in floorspace, as compared to the pre-application scheme. The applicant is requested to increase the provision of these units to at least meet the level set out as part of the pre-application scheme. Furthermore, there would also be an additional loss of other short-term accommodation, which comprises patient and visitor units, as well as further rooms for staff. There is no explanation for the loss of this accommodation.

22 In addition, the applicant is proposing the 74 staff and student units as Use Class C3 housing, when they should be considered as C2 institutional housing. The units fail to meet the Mayor's minimum standards for internal space or amenity space for C3 residential use and the residential layout also fails to meet the guidance in the Housing SPG, with the majority of units being single aspect. GLA officers are concerned that these units could become sub-standard rented housing, should a registered provider not take them on as specialist accommodation. The units should therefore be provided as C2 institutional housing, with the management and occupancy controlled through the S106 agreement.

23 Overall, there would be a reduction of over 2,300 sq.m. of floorspace for specialist housing use as a result of the proposal, equivalent to 127 units. Notwithstanding the expected improvement in quality of the staff and student units, this loss is a significant concern. The applicant is strongly advised to revise the scheme to ensure that the qualitative improvement to the staff and student units is met by a significant increase in floorspace and that there is no overall net loss of specialist accommodation floorspace, in order to ensure compliance with London Plan Policy 3.14.

24 The applicant has confirmed that the rents of the existing specialist accommodation are not currently controlled through a planning permission or S106 agreement and that the proposal provides an opportunity to achieve this control. It is expected that the new units would be provided at no more than 80% of market rent, although it is noted that this is likely to result in higher overall rents compared to the existing accommodation. The applicant is requested to provide additional clarification over the existing and proposed rent levels. The applicant should also have regard to the affordability of this accommodation as part of the overall scheme viability, to ensure that the specialist housing remains affordable for its intended occupants.

Housing

25 Excluding the specialist accommodation discussed above, the application proposes a total of 396 residential units and a detailed housing schedule is provided in Table 2 below.

unit type	number	% of total scheme
studio	14	3.6
1 bed	190	48.0
2 bed	139	35.0
3 bed	50	12.6
4 bed	3	0.8
total	396	100.0

Table 2: housing schedule

26 It should be noted that there are a total of 47 existing residential units across the site, so the proposal would result in a net increase of 349 units. The proposed housing would make a welcome contribution towards meeting London's housing need and is supported in line with London Plan Policy 3.3.

Affordable housing

27 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan Policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent or affordable rent and 40% for intermediate rent or sale.

28 The application proposes a total of 396 units, 70 of which would be affordable, equating to 21% of the scheme when measured by proportion of habitable rooms. The applicant states that this is the maximum reasonable contribution towards affordable housing and a financial appraisal has been submitted in support of the application. The Council should appoint an independent consultant to verify this position, as well as including a review mechanism in the S106 agreement to enable an additional contribution to be sought, should viability improve.

29 The proposed tenure split of 86:14 in favour of social rent would not meet the strategic objectives of the London Plan mentioned above, or the requirements of Tower Hamlets Local Plan Policy DM3, which seeks a 70:30 split. The London Plan makes it clear that any variation from this split should be robustly justified on the basis of local need and the applicant advises that the mix has been devised through discussions with the Council. The Council should confirm that the tenure split is required to meet a particular need for rented accommodation in this area.

Housing choice

30 London Plan Policy 3.8, together with the Mayor's Housing SPG, seeks to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes. The proposal, as currently submitted, includes 53 family units, equating to 13.4% of overall housing provision. It is noted that 18 of these units would be social rent, including 13 four beds. Whilst it is recognised that this location may not be suited to a large proportion of family housing and that priority has been

given to affordable family homes, the provision of 3 and 4 bed units is low. The Council should confirm that the mix responds appropriately to local housing need.

Density

31 The Mayor's Housing SPG makes it clear that the impact of mixed use developments can be underestimated when the density is calculated on the basis of the total site area. Paragraph 1.3.63 sets out a methodology for calculating net site area for vertically-mixed schemes. The majority of the scheme is vertically stacked, with retail and specialist housing uses located above and below residential. However it is noted that Block Hb contains only non-residential uses, so for the purposes of this calculation the footprint of this building has been excluded from the site area and the floorspace excluded from the net density calculation.

32 Based on the net density calculation for mixed use schemes discussed above, the density of the development is 347 units per hectare and 918 habitable rooms per hectare. This is within the London Plan guidance range of 650 to 1,100 habitable rooms per hectare for central sites with a public transport accessibility level of 5/6, as set out in London Plan Policy 3.4.

Housing quality and amenity

33 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. The application documents confirm that all units will meet the minimum internal space standards and external amenity space standards set out in the London Plan, which is welcomed.

34 Key factors such as floor-to-ceiling heights, orientation, maximising ground-floor individual access points, and number of units per core, are all essential to achieving high residential quality are also of particular importance when assessing residential quality. It is clear from the submitted documentation that the residential layouts have generally been designed to ensure that the standard of accommodation will be high. However, there are concerns about the layout on the lower levels of Block I, with regard to the number of units per core. This is discussed in more detail in the urban design section below.

35 As mentioned in paragraph 16, the applicant should demonstrate that the proposed housing would provide appropriate living conditions for future occupiers, having regard to the potential impact from noise and vibration from nearby life science uses.

Children's play space

36 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance, including a benchmark requirement for 10 sq.m. of play space per child. Based on the child yield methodology set out in this SPG, the applicant has calculated that the development will be home to 90 children, 40 of which are expected to be under five years old.

37 The applicant proposes to incorporate 645 sq.m. of play space within the eastern courtyard, in addition to general residential amenity. The overall approach to play and recreation set out in the applicant's Design and Access Statement (DAS) suggest that high-quality facilities will be provided that exceed the needs of the under-5s associated with this development, and this approach accords with London Plan policies. The Council should secure details of the play space by condition.

38 The DAS also includes an audit of other play areas in the locality, along with their walking distances. Given that the scheme would be home to 50 children between 5 and 15, there is likely to

be some reliance on these play areas by occupants of the development. The applicant should discuss with the Council whether upgrades are required to any of these facilities and if necessary a contribution should be sought through the S106 agreement.

Urban design

39 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London.

Layout and public realm

40 The scheme achieves the main design objective of the WVM, with the creation of the large north-south green spine linking Varden Street with the rest of the Med City campus to the north, which is supported. The landscape design of this space will ensure that this is a primarily green space, retaining a campus feel, and the implementation of this should be secured by condition by the Council. The proposal to locate retail units on either side, along with residential core entrances, will ensure that this space is well animated. The proposals for the western part of the site would in effect reinstate Walden Street with a new pedestrian route fronted by new townhouses linking the green spine to Turner Street, which is welcomed. Following pre-application discussions with GLA officers, the eastern courtyard space would be fenced off from the green spine and would be provided as private amenity space only. Whilst this would reduce the public realm contribution of the scheme, it would provide amenity and would have a security benefit, so this approach is considered appropriate.

41 The amount of active frontage has been maximised and the building entrances have generally been located carefully to ensure that all surrounding streets feel safe, active and well used. However, the entrance to Block Ha would be through a narrow underpass with a convoluted route around a proposed stairwell. This underpass is also utilised by a number of businesses, but is likely to be quiet in the evenings. There are therefore concerns about the safety and security of the layout of this passage as the main entrance to the units in this block. The applicant is requested to amend the layout here to ensure that there are opportunities for natural surveillance throughout, or alternatively explore a gated arrangement for the underpass to address this concern.

Residential quality

42 As mentioned above, the quality of the residential accommodation proposed is generally considered to be high, with the majority of blocks meeting the Mayor's London Plan and Housing SPG standards and London Plan guidance for floor-to-ceiling heights, dual aspect, orientation, maximising ground-floor individual access points, and number of units per core. However, the DAS submitted with the application suggests that on the first to fourth floors of Block I there would be nine units per core, with the inclusion of two single aspect north facing studio units on each floor. The submitted drawings differ, with no studios and only seven units from each core. These studio units appear to be taken into account in the housing mix set out in the Planning Statement, which refers to a total of 14 studios across scheme. The applicant should clarify what is being proposed and update the relevant housing mix figures accordingly. However, the layout shown in the DAS with the proposed studio units would not be acceptable as it would lead to a proliferation of single aspect north facing studios across the scheme and would result in too many flats being served by this core. This part of the proposal should be amended to reflect the submitted drawings.

Scale and massing

43 A detailed assessment of the scheme's impact on strategic views and heritage assets is undertaken below. Overall, the scheme proposes a varied scale across the site, responding to the

mixed scale and character of the area. The taller elements would be no taller than the existing Royal London Hospital building and would step down from the bulk of this building, as envisaged in the WVM.

44 The applicant's Environmental Statement (ES) contains a Wind Microclimate Assessment of the usability of outdoor spaces within and around the proposed development, having regard to the Lawson Comfort Criteria. The assessment concludes that the proposed outdoor spaces are mostly acceptable for their intended uses, with the exception of the southern entrance on Block I, the roof terrace on Block F and some balconies on Block I. However, mitigation measures are suggested, including entrance screens, balustrades and planting, which should ensure that all these spaces are usable. The Council should impose a condition to ensure that mitigation measures are approved and implemented, following full testing, as recommended in the ES.

Architectural treatment

45 The proposal comprises a variety of architectural styles and treatments across the scheme, reflecting the mixed character of area. The applicant has utilised two architects to achieve a diverse approach to the design of the buildings, which is welcomed. The architectural approach is therefore supported, however materials and the quality of detailing will have a significant impact on overall quality in the completed scheme. The Council is therefore strongly encouraged to secure the retention of the architects during detailed design phases, in addition to utilising appropriate conditions securing design detail and materials.

Strategic views and heritage

Strategic views

46 In terms of the strategic views identified in the Mayor's London View Management Framework SPG (July 2012) (LVMF), the proposals lie in the background of the London Panoramas from Parliament Hill (LVMF 2), Primrose Hill (LVMF 4), Greenwich Park (LVMF 5) and Blackheath Point (LVMF 6). The Townscape, Heritage & Visual Impact Assessment (THVIA) includes accurate proposed visual representations of these views (including cumulative assessment), as well as the River Prospects from London Bridge (LVMF 11) and Waterloo Bridge (LVMF 15).

47 The THVIA demonstrates that the proposed towers would be visible in LVMF views from Greenwich Park, Parliament Hill and Blackheath Point. However, they would be seen in the context of the mass of the adjacent Royal London Hospital (RLH) building, with the varied heights of the two buildings ensuring that the mass steps down away from RLH. The scheme would begin to form a cluster of height around the RLH, which is expected to grow with the addition of other taller schemes through the Whitechapel Vision Masterplan, which is considered a positive townscape solution and outcome. The proposal would therefore address London Plan Policy 7.12 on the impact on strategic views.

Historic environment

48 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*" and in relation to conservation areas, special attention must be paid to "*the desirability of preserving or enhancing the character or appearance of that area*".

49 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

50 The applicant's Townscape, Heritage and Visual Impact Assessment (THVIA), sets out a number of proposed views showing the potential impact the development would have on nearby listed buildings, conservation areas and locally listed buildings. In particular, the London Hospital, Myrtle Street and Ford Square Conservation Areas are either within or adjacent to the site. The listed buildings 39-49 Walden Street, 43-69 Philpot Street, 46-48 Ashfield Street, 28-42 Newark Street (all Grade II) and St Augustine's Church (Grade II*) are all either adjacent or within 50 metres of site. Other non-designated heritage assets include locally listed buildings around Ford Square and 37-43 Ashfield Street.

51 These heritage assets have heritage interest as remnants of the historic development of Whitechapel and the Royal London Hospital, particularly during the 19th Century. The likely effects on the settings of all of these heritage assets and those elements of setting that contribute to their significance have been addressed in detail in the THVIA. This document also addresses the potential impact of the proposed demolition of two buildings (80a Ashfield Street and 38 Turner Street) within conservation area boundaries on the site to facilitate the scheme.

52 The THVIA demonstrates that the proposed development will be visible in a number of views that fall within the settings of the heritage assets set out above. In particular, the development would be visible above heritage buildings in views 1, 2, 3, 4, 8, 13, 16, 17, 18, 20, 21 and 31 in the THVIA. However, GLA officers consider that the likely effects on the setting of these heritage assets would not cause substantial harm and, in many cases, the settings would in fact be enhanced by the high quality of architecture proposed and sympathetic use of materials. With specific regard to the scale and massing of the scheme, owing to the existing and emerging built context, the proposal would be seen in relation to the existing RLH building, as well as other large and tall buildings associated with the hospital and surrounding housing estates. As such the impact is not considered to cause substantial harm in this urban context, subject to ensuring a high quality finish for the proposed buildings.

53 In summary, GLA officers consider that the harm to the heritage assets identified above would be less than substantial and clearly outweighed by the public benefits of the scheme, namely improved public realm, delivery of an appropriate mix of uses and the overall contribution towards the regeneration of the life science campus, which is a strategic priority. The proposal would therefore address the requirements of the policies set out above, subject to the resolution of the strategic land use concerns set out earlier in this report. In reaching this conclusion, GLA officers note that the THVIA demonstrates that there would be no adverse impacts on the Tower of London World Heritage Site or its setting, therefore satisfying London Plan Policy 7.10.

Flooding

54 The site is within Flood Zone 1 and has no significant risk of surface water flooding. Therefore the proposals are acceptable in principle in relation to London Plan Policy 5.12. The Sustainability Statement states that the proposals will achieve at least a 50% reduction in surface water discharge using SUDS techniques. The Council should impose a condition requiring details of a surface water drainage scheme to be submitted, approved and implemented.

Inclusive design

55 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will meet Lifetime Homes standards, and that 10% of the units will be designed to be fully adaptable and adjustable to wheelchair users. However, it is unclear where these units are located and how they are split between blocks, tenures and unit sizes. The applicant is requested to provide a full schedule of the proposed wheelchair adapted and adaptable, showing their location within the scheme and tenure. As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4 (2) and M4 (3) by condition. All of the non-residential uses and public realm would be fully accessible and this is supported.

56 There are 13 blue badge spaces proposed at basement level, out of 41 spaces in total, which would fall short of the 10% requirement. It is also noted that the basement is only directly accessible from Blocks E-I, so the accessible units in the other blocks may require on street blue badge parking spaces to be agreed with the Council. The applicant should confirm which units can directly access the basement parking as part of the schedule requested in paragraph 54. The applicant should also discuss the potential for on street provision where necessary, as should also consider increasing the number of blue badge spaces within the basement. The Council should secure a car parking management plan by condition, to include measures to ensure that these spaces are assigned to occupiers of the accessible residential units and how blue badge spaces could be converted should there be demand.

Climate change - adaptation

57 The proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. Measures proposed include high level insulation and air tightness, solar shading and control glazing, low energy lighting and energy efficient appliances, low water use sanitary-ware and fittings, greywater recycling, green roofs and petrol interceptors to car park areas to protect water quality. The Council should impose conditions to ensure that these measures are implemented as part of the development.

Climate change - mitigation

Energy efficiency

58 The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions, and a range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery and LED lighting.

59 The demand for cooling will be minimised through openable windows, external and internal shading, solar control glazing and enhanced mechanical ventilation. The applicant has carried out an overheating assessment in line with CIBSE TM52 and TM49, which is welcomed. As a result of the analysis the applicant has integrated sufficient passive measures to ensure that all dwellings pass the requirements under current weather conditions. Blocks E, I and the penthouses will need active cooling to meet the requirements. Under future climate conditions the majority of rooms tested do not pass the overheating criteria. The applicant should bear this in mind relative to the expected lifetime of the buildings and if necessary ensure the design allows for the retrofit of additional measures to address overheating at a later date.

60 The development is estimated to achieve a reduction of 62 tonnes per annum (7%) in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development. Sample DER and TER sheets and BRUKL sheets have been provided to support the savings claimed.

District heating and renewables

61 The applicant has carried out an investigation and identified that there are some potential future district heating opportunities in the vicinity of the development. Connection to wider district heating networks should be prioritised and evidence of correspondence (with the Tower Hamlets Council energy officer and other relevant parties) should be provided to demonstrate that these opportunities have been fully investigated.

62 The applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available, which is welcomed. The applicant is proposing to install a site heat network connecting all buildings on site. A drawing showing the route of the heat network linking all buildings on the site has been provided. The site heat network will be supplied from a single energy centre. This will be 147 sq.m. in size and located in the basement of blocks B1 and B2.

63 The applicant is proposing to install five 20 kWe gas fired CHP units as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated carbon dioxide emissions of 165 tonnes per annum (19%) will be achieved through this second part of the energy hierarchy.

64 The applicant has stated that the provision of five 20 kWe units will achieve higher savings than a single 104 kWe unit. It is unclear how this is possible given that the 104 kWe unit has an overall higher efficiency, a lower heat to power ratio and appears to meet a higher proportion of the site's heat load. Further information should be provided, including likely running hours and proposed operational arrangements. It would be expected that fewer, larger units would provide better carbon savings.

65 The applicant should also ensure that the carbon savings are calculated using gross efficiencies rather than net efficiencies for the engines to ensure that carbon savings are not overestimated. This should be supported by manufacturers' documentation. If necessary, the carbon savings from this tier of the energy hierarchy should be re-calculated.

66 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 346 sq.m. of solar PV on the roofs of the buildings. A roof plan showing the proposed location of the installation has been provided. A reduction in regulated carbon dioxide emissions of 21 tonnes per annum (2.4%) will be achieved through this third element of the energy hierarchy.

Summary

67 Overall the measures proposed result in a 28.7% reduction in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development, which falls short of the London Plan emission targets. Whilst it is accepted that there is little further potential for carbon dioxide reductions on site, in liaison with the Council the developer should ensure the short fall in carbon dioxide reductions, equivalent to 54.4 tonnes of carbon dioxide per annum, is met off-site.

Transport

Parking

68 A total of 41 parking bays are proposed within the basement, of which 13 will be for disabled users. This equates to 0.08 spaces per unit and represents an increase of 16 spaces when compared to existing. TfL welcomes the low parking ratio, however the spaces should be allocated towards blue badge or vehicles transferred on site under the Council's Permit Transfer Scheme (PTS) only. A draft car parking management plan has been submitted, which is supported, however it should be revised in line with these comments. The final document should be secured by condition by the Council.

69 Electrical vehicle charging points (EVCPs) are proposed in line with London Plan standards and the Council should impose a condition to ensure these are implemented. It would also be expected that the S106 agreement include an obligation to ensure that future residents are not entitled to on street parking permits.

Cycling

70 There will be 662 residential cycle parking spaces provided at both basement and ground floor level with an additional 42 spaces provided within the basement for staff. A further 48 spaces are proposed within the public realm area to cater for visitors to the site and long stay retail parking. TfL considers the quantum proposed to be acceptable, however any long stay parking should be located internally. In addition, shower and changing facilities for all staff should be provided and the applicant should demonstrate how this can be accommodated.

71 There is expected to be a cumulative impact on local cycle hire capacity and therefore TfL requests that Tower Hamlets Council consider allocating CIL funding towards the delivery of additional docking points within the local area in accordance with London Plan Policy 6.9.

Trip generation

72 With regard to the residential impact assessment, the applicant should clarify how they have chosen to reallocate the vehicular trips between other modes as walking, cycling and bus mode shares have all been reduced. The methodology adopted for the commercial trip generation is nevertheless considered acceptable.

Public transport

73 The development will generate 25 two way bus trips in the AM peak and 19 in the PM peak. The cumulative impact of development within the Whitechapel area will have an impact on local bus capacity and therefore TfL is seeking a S106 contribution of £40,000 to introduce additional bus capacity in accordance with London Plan Policy 6.2. This is to be pooled with other contributions from other sites within the Whitechapel Vision Masterplan area.

74 TfL is satisfied that there will not be an unacceptable site specific impact on either London Overground or London Underground capacity, however due to the proximity of the London Overground to the site's western boundary TfL has provided the Council with infrastructure protection conditions to be attached to any consent.

Pedestrian and cycle environment

75 TfL welcomes that the layout of the proposed development will improve north to south permeability. It is not clear however whether this area would be accessible to cyclists and therefore the applicant should demonstrate how the public realm could be amended to accommodate cyclists.

Travel planning, access and servicing

76 Delivery and servicing activity will occur on street and will lead to the loss of six pay & display bays. To minimise the impact on the local highway the applicant should demonstrate why on site servicing is not feasible. The principles contained within the submitted Delivery and Servicing Plan are nevertheless considered acceptable and the final document should be secured by condition by the Council.

77 A framework Construction Logistics Plan has been submitted which is supported, however the applicant should note that TfL is proposing to prohibit the entry into Turner Street from Commercial Road and this could be in place by April 2017, which may require the proposed HGV routing to be amended. Furthermore, left turning HGVs should be avoided to minimise 'left-hook' conflicts with cyclists. The final document should be secured by condition to be discharged in consultation with TfL.

78 Both a workplace and residential framework travel plan have been provided however these will need to be amended before the documents can be considered acceptable. They should be secured, enforced, monitored, reviewed and funded through the S106 agreement to ensure conformity with London Plan Policy 6.3.

Mayoral Community Infrastructure Levy and Crossrail

79 The site is within the 1km Crossrail charging area of Whitechapel Crossrail station, however there is no uplift in chargeable land use and therefore no contribution is required. Nevertheless, the Mayor has adopted a Community Infrastructure Levy (CIL) and the rate for the borough of Tower Hamlets is £35 per square metre.

Summary

80 In summary, any car parking on site should be limited to blue badge and PTS spaces only, all long stay cycle spaces should be located internally, shower and changing facilities should be provided, the trip generation methodology should be clarified, permeability for cyclists should be improved, mitigation for the bus and cycle hire network is sought, and conditions relevant to servicing, construction and infrastructure protection need to be secured. Travel plans should be secured through the S106 agreement.

Local planning authority's position

81 The Council is currently considering the application and is not targeting a specific committee at this time.

Legal considerations

82 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the

application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application , or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

83 There are no financial considerations at this stage.

Conclusion

84 London Plan policies on Opportunity Areas, housing, urban design, tall buildings, heritage, inclusive design, climate change, and transport are relevant to this application. The principle of the housing-led mixed-use redevelopment of this site is supported. However, a number of strategic concerns are raised, and consequently the application does not accord with London Plan Policy:

- **Employment and mixed use:** the applicant should provide further clarification about how the proposed employment space can contribute to the strategic priority of the Whitechapel life science campus and address concerns over the management of the employment space, as well as affordable employment and retail space, to satisfy London Plan Policies 2.13, 4.9, 4.10 and the City Fringe Opportunity Area Planning Framework. The applicant should also confirm that the existing training centre on site will be accommodated elsewhere, to satisfy London Plan Policy 3.18.
- **Specialist housing:** the applicant should ensure that the qualitative improvements to the staff and student units is met by a significant increase in floorspace, that there is no overall net loss of specialist accommodation floorspace, that it would be affordable for intended occupants and that this accommodation is provided as Use Class C2 space, in order to ensure compliance with London Plan Policy 3.14.
- **Housing:** it is not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing, in accordance with London Plan Policy 3.12. The applicant should also address concerns raised with regard to the housing mix, the proposed tenure split and residential quality.
- **Urban design:** the applicant should seek to address concerns relating to residential quality and layout, to ensure compliance with London Plan Policies 3.5 and 7.3.
- **Inclusive design:** the applicant should provide further information in relation to accessible housing and blue badge parking, in order to satisfy London Plan Policies 3.8 and 6.13.
- **Climate change mitigation:** the energy strategy does not accord with London Plan policies 5.2, 5.6 and 5.9. Further information is required regarding district heating connections and CHP.
- **Transport:** there are a number of outstanding transport matters that require resolution to ensure full compliance with London Plan transport policies. Car parking on site should be limited to blue badge and PTS spaces only, all long stay cycle spaces should be located internally, shower and changing facilities should be provided, the trip generation methodology should be clarified, permeability for cyclists should be improved and mitigation for the bus and cycle hire network is sought, including a £40,000 contribution towards buses

to be secured through the S106 agreement. Conditions relevant to servicing, construction and infrastructure protection need to be secured by condition by the Council, whilst travel plans should be secured through the S106 agreement.

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