 Guy’s tower, Guy’s & St Thomas’ hospital
in the London Borough of Southwark
planning application no. 11/ AP/ 0645

Strategic planning application stage 1 referral (new powers)

The proposal
External refurbishment of the hospital tower.

The applicant
The applicant is Guy’s & St Thomas NHS Foundation Trust, and the architect is Penoyre & Prasad.

Strategic issues
The key strategic issues relate to design, impact on heritage, strategic views and climate change.

Recommendation
That Southwark Council be advised that the application complies with the London Plan, for the reasons set out in paragraph 40 of this report and does not need to be referred back to the Mayor. The Council should, however, take account of the comments made in paragraph 41 of this report.

Context
1 On 29 March 2011, the Mayor of London received documents from Southwark 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 has until 9 May 2011, to 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 Category 4 of the Schedule to the Order 2008:
“Development in respect of which the local planning authority is required to consult the Mayor
by virtue of a direction given by the Secretary of State under article 10(3) of the GDPO.”

3 Once Southwark 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; or allow the Council to determine it itself, unless otherwise advised. In this instance if Southwark Council resolves to refuse permission it need not refer the application back to the Mayor.

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

Site description

5 The application site is the Guy’s and St Thomas’ hospital towers, located on St Thomas’ Street, adjacent to London Bridge Station. The building was opened in 1974 and is recognised by its brutalist architectural form, concrete facade and height of 143 metres. Although appearing as a single building the tower is split in to two parts, joined by a narrow glazed link bridge. The taller more iconic element of the building is used for communications (‘comms tower’); the slightly lower wider element accommodates a mix of research and clinical space.

6 The surrounding area is mixed in character and building scale. To the north is the Shard, currently under construction, and London Bridge Station and railway viaduct. To the south is the remainder of the hospital campus buildings. East leads towards Bermondsey Street and the Bermondsey Street conservation area and to the west is Borough High Street, Borough Market and Southwark Cathedral (grade I listed building). Borough High Street conservation area also covers the area to the west. The building is visible in a number of strategic views defined in the London View Management Framework.

7 The site is located in close proximity to the A200 St Thomas Street, part of the Transport for London Road Network (TLRN). It is within 200 metres of London Bridge Station which provides access to the Northern and Jubilee London Underground lines as well as a range of bus and rail services. As a result the site has a public transport accessibility level of 6 on a scale of 1 to 6 were 6 is most accessible.

Details of the proposal

8 The design proposals are to re-clad the comms tower with a profiled anodised aluminium rain screen and replace the existing windows with curtain walling. The research tower will be cleaned and cladding applied. The glazed link will be made full height glazing with the current internal plinth wall removed at each level. The Trust has also appointed artist Carsten Nicolai to deliver the profile for the top of the building, which will be illuminated at night. The layouts and functions of the internal elements of the building will not be affected. The Trust intends that operation of the building will continue during the proposed works.

Case history

9 On 28 October 2010, GLA officers met with the design team at pre-application. The design material was still being progressed and a full submission of material was not received until 9
February 2011. GLA officers issued formal advice on 11 February 2011 and further advice on climate change on 18 February 2011. At that time officers were broadly satisfied with the approach to climate change, but were concerned about its design as the modern cladding approach was considered a weak response to the honest form of the building.

10 A further design meeting was held on 24 February 2011, in response to the initial pre-application feedback. Follow up GLA officer comments were provided on 10 March 2011. In addition an accompanied site visit was held on 11 March 2011. At the follow up design meeting, the applicant provided background to the design rationale and the technical constraints regarding the options for bringing the building up to specification. Further detailed design material was presented, including a model of the façade and sample materials being considered. The comments subsequently issued by the GLA were broadly supportive of the design approach.

Strategic planning issues and relevant policies and guidance

11 The relevant planning issues and corresponding policies are as follows:

- Economic development London Plan; the Mayor’s Economic Development Strategy
- World city role London Plan
- Urban design London Plan; PPS1
- Regeneration London Plan; the Mayor’s Economic Development Strategy
- Tall buildings/views London Plan; RPG3A, Revised View Management Framework SPG
- Health London Plan
- Sustainable development London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor’s Energy Strategy; Mayor’s draft Climate Change Mitigation and Adaptation Strategies; Mayor’s draft Water Strategy; Sustainable Design and Construction SPG
- Historic Environment London Plan; PPS5

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 the 2011 Southwark Core Strategy, the Southwark Unitary Development Plan (as saved) and the London Plan (Consolidated with Alterations since 2004).

13 The following are also relevant material considerations:

- The draft replacement London Plan, published in October 2009 for consultation.
- The consultation draft Borough, Bankside and London Bridge SPD.

Principle of development

14 The site is located within the London Bridge and Bankside Opportunity Area and within the Central Activities Zone as identified in the London Plan. In terms of the strategic priorities for the London Bridge and Bankside area, these are set out in chapter 5D which focus (paragraph 5.108) on redevelopment and intensification of London Bridge station and its environs. Priorities for the CAZ are set out in policy 5G.2 and include the objective to enhance the operating environment and to promote growth. These themes are also reflected in chapter 2 of the draft replacement London Plan.
The objectives of the Opportunity Area status are set out in London Plan policy 2A.5 and Southwark Council has produced a draft Bankside, Borough and London Bridge SPD which went out to public consultation in February 2010 and again in December 2010. It is, however, the Council’s intention to revisit the SPD in collaboration with the GLA and other key stakeholders to produce a joint document which the Mayor can choose to endorse as an opportunity area planning framework for Bankside, Borough and London Bridge.

This is however currently on hold and the future of the document is subject to review as the Localism Bill is tested. Part of the new Bill allows the production of neighbourhood plans. In this particular case local residents around Bermondsey Street have set up a Neighbourhood Planning Forum and been given vanguard status to test the process of neighbourhood planning set out in the Bill. The planning framework for this area may, therefore, change but this is subject to various stages of consultation with key stakeholders.

The Council’s current draft SPG sets out specific guidance regarding the redevelopment principles of the Guy’s Hospital campus. Part of the issues identified include the impact of Guy’s Tower (its appearance), which is identified as detracting from the area. In terms of guidance, the Council sets out aspirations that development schemes should improve the appearance of Guy’s tower (section 5.2 ‘Built Form’).

The refurbishment of the external facade of the tower is a marker for regeneration and fits within the aspirations for regeneration within the Opportunity Area, world city role and the Council’s objectives to improve the appearance of the tower to reduce its impact on the surrounding environment. The principle of improving the appearance of the building is therefore supported in strategic planning terms.

Urban design

Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B, which address both general design principles and specific design issues. Policy 4B.1 sets out overarching design principles for London, and states that the Mayor will seek to ensure that new developments maximise site potential (see also policy 3A.3), enhance the public realm, provide a mix of uses, be accessible, legible, sustainable, safe, inspiring, exciting and respect London’s natural and built heritage. Policy 4B.2 promotes high quality, world-class contemporary and integrated design.

The nature of the building as an iconic structure in London’s skyline is due largely to the form and materials which define its brutalist character. The honest appearance and expression of form and materials of the current building is one of its defining features and this is partially lost in the new design approach which seeks to bring the building up to current building regulation standards whilst seeking to modernise its overall appearance.

To achieve this successfully is a challenge given the nature of cladding an existing building of this type, which already has a very distinctive character. During pre-application discussions the design team explained the constraints to the comms tower in terms of restoring the building to its original appearance. The preferred solution by officers would be to return the building to its original 1970’s appearance, however this approach is not feasible given the existing concrete facade is not pre-cast, and therefore the facade cannot be removed in sections as it forms a structural element to the building that needs to be protected to mitigate against further degradation of the building’s structure.
The result is the need for a series of actions to protect the existing structure from further decay. The applicant describes this as a layered approach to the design. First, to repair areas
currently deteriorating; second, seal those areas and third protect them from further or future exposure through the application of new cladding.

23 The textures expressed in the facade of the new design are informed by the existing features of the comms tower. For example, retention of all window openings, dimensions of the existing concrete forms and the differing treatment to the lecture theatre at the top of the building. These features dictate the new language of the building as interpreted by the design team.

Figure 2: existing Guys tower (view from Leather Market Gardens - source: Visual Impact Report)
Figure 3: proposed new cladding (view from Leather Market Gardens - source: Visual Impact Report).
The colour of the aluminum cladding is still being explored, however samples of the two colours shown in the application submission above (grey/blue and champagne) have been provided. The intention is to construct a sample area on site for discussion and agreement with Council officers and key stakeholders and this should include the GLA. This process should be secured through condition.

In addition, it is not clear how the light installation at the top of the building is likely to appear in its final form. Whilst the principle of such an installation is broadly supported, the GLA would welcome further informal consultation as the design is progressed to the next stage with Southwark Council and this process should be secured by condition.

The anodised aluminum has the potential to be both striking and bold in the same way the architectural form was when originally conceived. It is important therefore that the materials to be
used will be high quality and durable so as to achieve longevity where the original materials have failed. The Mayor’s policy is to ensure that new architecture will inspire, excite and delight. The success will be dependant on the quality, colour and finish to the materials, which is still subject to further discussion. Whilst there is no strategic concerns with the proposed approach, GLA officers would welcome further informal consultation in discussion with Southwark Council as the design progresses to its construction stages, specifically regarding the final material and the detail of the light installation.

**Heritage**

27 London Plan policies 4B.11 to 4B.15 set out the strategic approach to the protection and enhancement of London’s rich built heritage. The impact on the setting of the Tower of London World Heritage Site already exists. The tower appears just above the Queens House, when viewed in front of the green. The only additional roof top elements comprise the light installation. Whilst the details of this have yet to be finalised it is unlikely to have a significant impact on the World Heritage Site. The impact is therefore broadly acceptable in this respect, and is unlikely to be noticeable. Other important historic assets including the setting of Southwark Cathedral, and the adjacent Conservation Areas will be more noticeable, however the impacts will preserve and in some instances enhance the setting of these historic assets, given that the current impact of the building is significant. Improvements to the facade as proposed will provide more sympathetic finish to the building in its setting. English Heritage should, however be consulted, in particular regarding the setting of Southwark Cathedral, St Paul’s Cathedral and the Tower of London.

**Strategic views**

28 London Plan policies 4B.16 to 4B.18 set out the strategic approach to the management of strategically important views. GLA officers agreed the set of views to be provided. The impact on the setting of St Paul’s Cathedral in the views from Parliament Hill and Kenwood are broadly acceptable and should not harm the ability to appreciate or understand the setting of St. Paul’s. The local and river prospect views are more sensitive to the proposed alterations but the impact is also broadly acceptable and is similar to those described above regarding the setting of the historic assets.

**Climate change mitigation**

29 London Plan policies 4A.4 to 4A.7 require the submission of an energy demand assessment along with the adoption of sustainable design and construction, demonstration of how heating and cooling systems have been selected in accordance with the hierarchy and how the development will minimise carbon dioxide emissions, maximise energy efficiencies, prioritise decentralised energy supply, and incorporate renewable energy technologies, with a target of 20% carbon reductions from on-site renewable energy. Chapter 5 of the draft replacement London Plan echoes the policy approach already in the current London Plan.

30 A thorough analysis has been undertaken to aid in the understanding of the impact that the refurbishment of the towers facade will have in the energy loads of the buildings.

31 As a result of improving the thermal performance of the facade, the heating requirements of the indoor spaces will be reduced, due to better insulation materials and reduced infiltration levels.

32 The cooling demand will, however, increase as it will more difficult for the unwanted heat to escape the building. Opportunities to control and minimise unwanted solar gains will however
be incorporated as part of the refurbishment of the façade. Energy efficiency savings result in an approximate 8% reduction in carbon dioxide as a result of the refurbishment works.

33 Overall, the improvements to energy efficiency are broadly consistent with the first stage of the energy hierarchy to reduce energy consumption through design. Given there are no other proposed changes to the structure in terms of land use or functions the second and third part of the hierarchy is not relevant in this instance.

Transport for London’s comments

34 Given the nature of the proposal it is TfL’s view that there will be no impact on the highway or public transport network.

35 A construction logistics plan will be required as part of the application in order to ensure minimum disruption to the movement of traffic (including bus operations, cyclists and pedestrians) during the construction phase of this development. This is particularly important in this area given the level of on-going and planned construction activity in the London Bridge area. The construction logistics plan should include details of construction trips generated, site access arrangements, construction routes and cumulative impacts of construction traffic; any security issues should also be identified at this stage.

36 This should include key phasing for construction works and as much of the above information as possible. TfL expects the construction management plans to be secured by planning condition. Subject to the above TfL has no further comment on this application.

Local planning authority’s position

37 The officer recommendation is unknown at this stage.

Legal considerations

38 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. 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

39 There are no financial considerations at this stage.

Conclusion

40 London Plan policies on urban design, heritage, strategic views and climate change are relevant to this application. In general, the application complies with these policies, for the following reasons:

- Design, heritage and views: The design rationale has been clearly articulated and appropriate townscape and heritage analysis has been undertaken.
• Climate change: The proposal is consistent with the relevant parts of the energy hierarchy and will result in improved energy performance.

41. Notwithstanding that the application complies with the London Plan GLA officers seek further informal consultation regarding the following matters and this should be secured by condition:

• Final approval of materials;
• The final design of the light installation to the top of the tower.

for further information, contact Planning Decisions Unit:

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