**Former Royal London Hospital, Whitechapel**

*in the London Borough of Tower Hamlets*

**planning application no. PA/17/02825**

<table>
<thead>
<tr>
<th>Strategic planning application stage 1 referral</th>
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<tr>
<th>The proposal</th>
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<tbody>
<tr>
<td>Partial demolition, including removal of the remaining west wing and the Grocer’s Wing (behind retained facade), alteration and refurbishment of the former Royal London Hospital and erection of a part four-storey and part seven-storey extension to provide a new Tower Hamlets Council Civic Centre. Listed building consent is concurrently sought for the necessary part-demolition, alterations and refurbishment of the former Royal London Hospital building.</td>
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In connection with these proposals, listed building consent is concurrently sought for part-demolition, alterations and refurbishment of the Grade II listed hospital building.

<table>
<thead>
<tr>
<th>The applicant</th>
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<tr>
<td>The applicant is <strong>Tower Hamlets Council</strong> and the architect is <strong>AHMM</strong>.</td>
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<table>
<thead>
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<th>Strategic issues</th>
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<td><strong>Inclusive access and design:</strong> Noting the civic nature of the building, the applicant should provide further details regarding the approach to entrances, ramp design, and consider the inclusion of lifts, separate baby change facilities, family facilities and a changing places toilet in line with draft London Plan Policy D3 and London Plan Policy 7.2 (Paras 42 to 43).</td>
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<td>The applicant must investigate additional measures to reduce carbon dioxide emissions within the new build element and ensure that any shortfall is met through a contribution to the Council’s carbon offset fund in line with draft London Plan Policy S12 and London Plan Policy 5.2. (Paras 44 to 46).</td>
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<th>Recommendation</th>
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<tr>
<td>That Tower Hamlets Council be advised that the application does not comply with the London Plan and draft London Plan, for the reasons set out in paragraph 55 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.</td>
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Context

1. On 13 November 2017 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 has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan and draft London Plan, and his reasons for taking that view. The Mayor may also provide other comments.

2. The application is referable under the following categories of the Schedule to the Order 2008:
   - Category 1B “Development which comprises the erection of a building or buildings with a total floorspace of more than 15,000 square metres;
   - Category 1C “Development which comprises or includes the erection of a building that is more than 30 metres in height”

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

Site description

5. The site is the ‘Main Block’ of the former Royal London Hospital and its surrounds, located south of Whitechapel Road, opposite Whitechapel Market and immediately to the north of the new Royal London Hospital complex. The site is bounded to the west by other hospital buildings and by East Mount Street to the east. Access to the entrance of the new hospital site is via East Mount Street, across which lies the Urban Bar public house.

6. The building itself is Grade II listed, and situated in the London Hospital Conservation Area. The site is within the City Fringe Opportunity Area and within a District Town Centre, as identified by the London Plan and draft London Plan. The site is within a Local Office Location, as identified by Tower Hamlets Core Strategy and also within the boundary of the Whitechapel Vision Masterplan SPD.

7. The site is directly opposite Whitechapel Underground station which is served by the District and Overground lines and, from 2018, the Elizabeth Line. The site is also served by numerous busses and as such has a PTAL of 6b, which is excellent.

Details of the proposal

8. The applicant proposes an office-led mixed use building within the refurbished existing building, plus extensions to the rear. This will involve the partial demolition of existing buildings, and the addition of new buildings providing a net uplift of 10,529 sq.m. of floorspace.

9. The new building would become the principle Town Hall for Tower Hamlets Council and would include:
   - Office accommodation for staff;
   - A Council chamber;
- Reception, atrium and waiting area/ lobby;
- Meeting rooms;
- Cafe, library, drop-in service centre, public meeting rooms and access to public facing Council services.

10 The applicant proposes to retain the original building within the 1750’s building footprint and the later third and fourth floor extensions. These would be retained, refurbished and adapted along with the Chapel.

11 The Grocers’ Wing, at the eastern side of the main building would have its front and side elevations retained, and a new roof would be constructed along with a new four storey building behind the facade. A new lower ground glass entrance would be created.

12 A new seven storey building would be constructed to the south of the western part of the building. This would house the chamber and appear above the main building in views from Whitechapel Road. The new Grocers Wing and Chamber buildings would be linked via a new build element along the back of the existing building. In plan this creates a ‘Z’ configuration wrapping the south side of the original building.

13 The Council services would be contained within the Grocers wing at ground floor, alongside the cafe, reception, chamber and atrium/ waiting area. The building would be accessed from two entrances onto Whitechapel Road. The eastern entrance would via the glass entrance in the Grocers Wing, and the western entrance via the existing hospital building main entrance. The western entrance would access a long ‘super lobby’ which would connect through to the chamber and adjacent public foyer on the south side of the building, and also provide access to the two lift cores.

14 Office accommodation and meeting rooms for staff would be in the upper floors, accessed via the two lift cores and a staircase alongside the eastern lift core. The proposed office accommodation is open plan, wrapping around the northern and southern edges of the building, with meeting rooms and toilets arranged on the inside, between the lift cores. The existing chapel on the first floor would be re-purposed as a staff canteen. The existing operating theatre on the third floor would be re-purposed as a prayer room. The roof would include external amenity space for staff.

15 New public realm is proposed at the entrance to the building on Whitechapel Road, with hard and soft landscaping. It is also proposed that the ground level be lowered here to improve access to the Grocers Wing from the pedestrian crossing linking the site to Whitechapel Underground Station.

Case history

16 On 30 October 2017 the applicant held pre-application discussions with GLA officers. The applicant was advised that the links through the site and the quality of the adjacent new public realm would be critical and require further work and engagement with Barts NHS Trust, the adjacent landowner.

17 The applicant was also advised to exceed the levels of cycle provision set out in the London Plan and confirm whether the scheme is B1 or sui-generis for the purposes of applying the Crossrail SPG.
Strategic planning issues and relevant policies and guidance

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 Tower Hamlets Core Strategy and Managing Development Document (MDD) and the 2016 London Plan (Consolidated with Alterations since 2011).

The following are relevant material considerations:

- The draft London Plan (consultation draft December 2017).
- Whitechapel Vision Supplementary Planning Document (December 2014).
- The City Fringe Opportunity Area Planning Framework (December 2015).
- Mix of uses London Plan; Town Centres SPG;
- Urban design London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;
- Historic Environment London Plan; World Heritage Sites SPG;
- 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 London Plan; the Mayor’s Transport Strategy; Land for Industry and Transport SPG; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG.

Principle of development

The site is within the City Fringe Opportunity Area, which has an identified development capacity to accommodate 50,500 new jobs and a minimum of 15,500 new homes. As per London Plan Policy 2.13 and draft London Plan Policy SD1, proposals should seek to maximise residential and non-residential output and densities and contain a mix of uses. The City Fringe Opportunity Area Planning Framework (OAPF) sets out expectations in further detail. In particular, development proposals are expected to integrate with the surrounding area to support wider regeneration and improvements to environmental quality.

The CFOAPF identifies Whitechapel as one of the key strategic development locations within the City Fringe, where there is most potential for positive change in the next ten years. Of particular strategic importance is the potential to deliver a world class life sciences campus, and provide employment space to facilitate continued business growth.

The Whitechapel Vision SPD (WVSPD) incorporates the key development principles set out in the CFOAPF and considers the area and local issues in more detail, setting out a comprehensive vision and ten-year plan for the regeneration of the area. The WVSPD sets out detailed “key place transformations” for each key development site in Whitechapel.
<table>
<thead>
<tr>
<th>Land Use</th>
<th>Existing sq.m.</th>
<th>Proposed sq.m.</th>
<th>Net change sq.m.</th>
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<tbody>
<tr>
<td>Hospital (D1)</td>
<td>16,198</td>
<td>0</td>
<td>-16,198</td>
</tr>
<tr>
<td>Offices (B1)</td>
<td>0</td>
<td>18,667</td>
<td>+18,667</td>
</tr>
<tr>
<td>Multi-use ground floor (D1/ Sui generis)</td>
<td>0</td>
<td>5,049</td>
<td>+5,049</td>
</tr>
<tr>
<td>Ancillary support facilities and plant</td>
<td>0</td>
<td>3,011</td>
<td>+3,011</td>
</tr>
<tr>
<td>Total</td>
<td>16,198</td>
<td>26,727</td>
<td>+10,529</td>
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Table 1: Existing and proposed land use and floorspace summary

23 The application site is identified as ‘Key Place Transformation 2’, where priorities include bringing the hospital building back into civic use to improve the range of public services provided, and co-locating new employment, retail, office, cultural and community facilities.

24 It is noted that the proposals are designed to respond to the objectives set out in the WVSPD and achieve the key place transformation aspirations set out above. The principle to develop the site to include office, civic, community and retail uses as part of a partial refurbishment/ partial new-build proposal that also delivers permeability through the site and access to new public open space is supported in line with the London Plan, the draft London Plan, the City Fringe OAPF and the Whitechapel Vision SPD. The applicant’s proposal to bring the former Royal London Hospital building back into use is welcomed and the principle of development supported.

Urban design

25 Good design is critical to delivering the objectives of the London Plan and draft London Plan. Its policies and supplementary guidance set out specific requirements for the design of all developments in London. Furthermore, the Town Centres SPG sets out guidance on the design of town centre development.

26 The City Fringe OAPF identifies Whitechapel as an area where improving public realm and pedestrian connectivity should be prioritised. The strategic design principles in the CFOAPF and the WVSPD include the delivery of a north-south ‘green spine’ which would provide new public open space, a legible route from Whitechapel Road to Commercial Road and help underpin delivery of the life sciences campus cluster on sites to the south of the RLH. It is important that the public open space has a strong presence on Whitechapel Road, although the CFOAPF does recognise the challenges associated with connecting through the RHL building, and acknowledges that a creative approach will be required in order to achieve this.

27 At the pre-application stage, the applicant acknowledged the importance of the new routes and high quality civic spaces set out in the CFOAPF and the WVSPD and suggested that a new public open space, to be known as ‘London Square’, could be delivered as a response. This square would sit at the northern end of the emerging green spine, between the proposals and the new hospital building and linking to Whitechapel Road via East Mount Street. GLA officers welcomed this, however, concern was raised with regards to the delivery of the space, which is key to the delivery of GLA and Council development objectives yet falls outside of the applicant’s control.
The applicant has since engaged with the adjacent land owner, Barts NHS Trust, to agree on how London Square can be jointly delivered. Further information has also been provided demonstrating how the square could provide a high quality open space and significantly improve north-south and east-west permeability, with highly visible and legible entrances to the proposed building and the adjacent hospital building.

The applicant has secured an agreement to jointly deliver London Square with Barts NHS Trust and provided a memorandum of understanding to demonstrate the joint commitment to delivering the square to the specification outlined in the supporting materials. The Council intends to use CIL funding towards delivery.

It is acknowledged that the delivery of London Square falls outside of the land control of the applicant and the scope of the current planning application. The applicant’s commitment to delivering London Square is strongly supported and the demonstration of how this is to be jointly delivered with Barts NHS Trust welcomed.

The applicant proposes a link through the former Royal London Hospital building building from the north of the proposed green spine, onto Whitechapel Road. This is the most logical and direct route, and the applicant should confirm the arrangements for passing through the building outside of opening times.

The applicant also proposes to create a secondary connection from Whitechapel Road to the emerging green spine and London Square via East Mount Street and create a small piece of new public realm along the northern edge of the site between the Grocers Wing and Whitechapel Road. This new space would improve the setting of the building and enhance the presence of the new Town Hall, the proposed secondary connection and by extension the proposed new civic square. As such, this is supported. The provision of an entrance to the Grocers Wing onto Whitechapel Road and the use of glazing at ground floor serves to provide good levels of activity and passive surveillance onto the proposed new public realm.

As the connection along East Mount Street would be the main public access to the civic square, and therefore the proposed green spine, from Whitechapel High Street, the quality of the link along East Mount Street and how well integrated this is with the proposed new open space on Whitechapel Road, and the emerging green spine and London Square, are of critical importance. The applicant should confirm that improvements to East Mount Street will be progressed along with plans for London Square.

The proposals are ground floor plus seven storeys at their highest point and would not impact upon any strategic views. London Plan Policy 7.8 states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. Draft London Plan Policy HC1 seeks to ensure that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the asset’s significance and appreciation within their surroundings.

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”.

London Plan Policy 7.8 and draft London Plan Policy HC1 also apply to non-designated heritage assets. The NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, and a
balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

37 The application site includes a Grade II listed building, is within the London Hospital conservation area and within the setting of the London Hospital and Whitechapel High Street conservation areas. There are also several other listed and locally listed buildings in the nearby vicinity.

38 The proposals include works to the Grade II listed Royal London Hospital building and a separate application for listed building consent (Tower Hamlets Council ref: PA/17/02828/NC) has been submitted alongside the planning application. The application for listed building consent proposes retention and repair of the front and rear facades (including 1895 Portico and front Chapel extension); Removal of redundant pipework and wiring; Demolition of existing south-west wing; Demolition of Grocer’s Wing (behind retained façade at first, second and third floor level) and facsimile reconstruction of mansard roof, dormer windows and chimneys; repair and replacement of all existing windows with double glazing; Internal reconfiguration and refurbishment works; and the installation of connecting ‘bridge’ links to a part four-storey and part seven-storey extension (including partial basement) at the rear of the building.

39 The listed building consent covers works that are necessary to bring the Grade II listed building back into use, whilst enabling it to work with the new build elements of the proposals. The applicant has made significant effort to retain as much of the historical fabric of the existing building as possible. It is also noted that much of the floorspace that is proposed for demolition is contained within later additions to the original building, in elements that are less attractive and with limited historical significance. The visuals provided demonstrate that the proposed new builds represent a simple building form with a refined massing configuration and materials which successfully reference the original building whilst avoiding pastiche and clearly appearing as modern additions. The applicant has also designed the new buildings so that the occupants can appreciate the exposed rear flanks of the original buildings, which have been incorporated into the interior of the new buildings. This approach and the scope of works within the listed building consent is supported.

40 The applicant has provided a Design and Access statement in support of the application. This addresses the proposals as a whole and includes verified views taken from a number of locations to demonstrate the potential impact of the proposals on the listed Royal London Hospital and the conservation areas.

41 The proposed height is slightly higher overall than the existing building but significantly lower than the new hospital building to the south. The new build elements of the proposals would only be visible above the façade of the existing building in views from Whitechapel Road, with the extension appearing to integrate well with the scale of the existing building. The proposals would not detract from appreciation of the historic facade when viewed from Whitechapel Road and overall would enhance the setting of the listed building. When the new build elements of the proposal become visible above the existing roofline in views from Whitechapel High Street, these elements are set against the bulk and massing of the much larger new Royal London Hospital. The proposals would not result in harm to any of the nearby heritage assets and the application complies with London Plan Policy 7.8 and draft London Plan Policy HC1.

42 Finally, in accordance with Policy D11 (Fire Safety) of the draft London Plan, the Council should secure an Informative requiring the submission of a fire statement, produced by a third party suitable qualified assessor.
**Inclusive access and design**

43 The applicant has provided information demonstrating how inclusive access and design has been considered throughout the evolution of the design, and the applicant presented the scheme to the GLA’s Inclusive Design and Access Panel in November 2018. This was welcomed.

44 As this building will be delivering services to the public, it should meet the very highest standards of inclusive design. The applicant should provide further details regarding the approach to entrances, ramp design, and consider the inclusion of lifts, separate baby change facilities, family facilities and a changing places toilet in line with draft London Plan Policy D3 and London Plan Policy 7.2. Detailed feedback has been provided to the Council and the applicant under separate cover.

**Flood risk and sustainable drainage**

45 Whilst the site itself is generally free from surface water flood risk, other locations in the local vicinity are at risk, and there are some capacity issues on the wider combined sewer network. The development will achieve a run-off rate of 5l/s for the site through the use of rainwater harvesting, brown roofs and sub surface attenuation tanks. This approach is a welcome response to advice provided by GLA officers at pre-application stage and as such the application complies with draft London Plan Policies SI12 and SI13 and London Plan Policies 5.12 and 5.13.

**Energy**

46 The site is within an area identified for a future district heat network and could potentially house an energy centre for the proposed network. The applicant has identified a number of constraints to delivering such an energy centre on site, including the availability of space, and noise and air quality issues. It is accepted that these constraints make the development unsuitable for an energy centre of the scale and capacity required. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network and this is welcomed. The applicant should investigate how the number of plant rooms can be minimised in order to provide a single point for future connection.

47 A reduction of 32 tonnes of carbon dioxide per year is expected for the refurbished building, equivalent to an overall saving of 12% whereas the new build elements would achieve a reduction of 74 tonnes, or 20%. The on-site carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan and Policy SI2 of the draft London Plan . It is accepted that there is little further potential for carbon dioxide reductions within the refurbished listed building. The applicant should, however, fully integrate the scope for additional measures within the new build element and once all measures have been explored ensure that the remaining regulated carbon dioxide emissions are met through a contribution to the Council’s carbon offset fund in line with draft London Plan Policy SI2 and London Plan Policy 5.2.

**Transport**

48 There are no general parking spaces proposed, which is welcomed. Two Blue Badge spaces are proposed: one for staff and one for visitors. Details of how the staff Blue Badge space will be allocated should be provided.

49 The applicant proposes 336 cycle parking spaces which meets London Plan standards, however, the applicant must provide additional spaces to meet the shortfall against the draft
London Plan cycle parking standards and provide a lift or ramp access to lower ground floor cycle parking in line with London Plan Policy 6.9 and draft London Plan Policy T5. The applicant must re-consider the construction and delivery and servicing proposals to minimise the impact of heavy goods vehicles on pedestrians and cyclists. In line with London Plan Policy 6.9 and draft London Plan Policy T5, the applicant should identify opportunities to improve the local cycling environment that could be delivered using Council’s CIL.

50 The Council should secure funding for six new cycle hire docking points, safeguarding for London Underground infrastructure, a construction logistics plan and delivery and servicing plan and a full travel plan in line with London Plan Policy 6.3 and draft London Plan Policy T4.

51 In line with London Plan Policy 6.5, draft London Plan Policy T9 and the Mayor’s Crossrail SPG, the application is liable for the indicative charge for office use. The final figure should be confirmed by Tower Hamlets Council having considered the relevant MCIL contribution.

Planning obligations

52 The planning obligations required to make this application acceptable in planning terms would normally be secured by section 106 legal agreement. As Tower Hamlets Council is, in this case, the sole applicant and would also be the authority responsible for enforcing the section 106 agreement, an alternative to s106 must be used to secure planning obligations. It is understood that Tower Hamlets Council officers are currently refining a solution that involves the use of planning conditions, however, the details are not yet available. The Council must provide full details of the proposed mechanism and an explanation of how it would provide the Mayor with certainty that the impact of this development can be effectively mitigated. This should be done in advance of the Mayor considering this case again at Stage II. GLA officers would welcome further discussion on this matter.

Legal considerations

53 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is ordinarily 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. In this instance, the Mayor’s statement will be sent to the Planning Inspector to assist in the determination of the appeal.

Financial considerations

54 There are no financial considerations at this stage.

Conclusion

55 Draft London Plan and London Plan policies on Opportunity Areas, urban design, inclusive access and design, flood risk and sustainable drainage, energy and transport are relevant to this application. The application does not comply with the draft London Plan and London Plan for the reasons set out below, however, the possible remedies set out below could address these deficiencies:

Inclusive access and design: Noting the civic nature of the building, the applicant should provide further details regarding the approach to entrances, ramp design, and consider the inclusion of lifts, separate baby change facilities, family facilities and a changing places toilet in line with draft London Plan Policy D3 and London Plan Policy 7.2.
**Climate change:** The applicant must investigate additional measures to reduce carbon dioxide emissions within the new build element and ensure that any shortfall is met through a contribution to the Council’s carbon offset fund in line with draft London Plan Policy S12 and London Plan Policy 5.2.

**Transport:** The applicant must provide additional cycle parking spaces, reconsider access to the lower ground floor and the construction and delivery and servicing proposals, and identify opportunities to improve the local cycling environment that could be delivered using Council’s CIL. Funding for six new cycle hire docking points, safeguarding for London Underground infrastructure, a construction logistics plan, delivery and servicing plan, and a full travel plan should be secured. These changes are required in line with draft London Plan Policies T4 and T5 and London Plan Policies 6.3 and 6.9.

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