



Pre-application presentation

Reference	PF/20/00122
Site	Royal Mint Court, London, EC3N 4QN
Ward	St Katharine's and Wapping
Proposal	Redevelopment of the site involving change of use from an existing office development (B1 use) to provide for a new embassy (sui generis use).
Applicant	Chinese Embassy in UK
Architect	David Chipperfield Architects
Agent	DP9
Case Officer	Rikki Weir
Key dates	Pre-application request submitted June 2020 Pre-app discussions began in June 2020 CADAP review in December 2020

SITE PLAN



<ul style="list-style-type: none"> Planning Application Site Bound Other Planning Applications Consultation Area Land Parcel Address Point Locally Listed Buildings Statutory Listed Buildings 	<h2>Planning Applications Site Map PF/20/00122</h2>	 <p>TOWER HAMLETS London Borough of Tower Hamlets</p>
<p>This site map displays the Planning Application Site Boundary and the extent of the area within which neighbouring occupiers / owners were consulted as part of the Planning Application Process</p>		<p>Date: 29 January 2021</p>

1. BACKGROUND

- 1.1 The National Planning Policy Framework and the National Planning Practice Guidance promote early engagement between developers and Local Planning Authorities at the pre-application stage, prior to submitting a planning application. The Council welcomes pre-application discussions and has a well-established process to facilitate this. In March 2019 the Council's Development and Strategic Development Committees considered a draft protocol for pre-application presentations. The protocol is now incorporated in the Committee Terms of Reference. The Council's updated Statement of Community Involvement also highlights the importance of pre-application engagement and the role of elected members and local communities in this stage of the planning process.
- 1.2 This report updates the Strategic Development Committee on progress made and issues identified in respect of pre-application discussions for the proposed redevelopment of the Royal Mint Court site.

2. DESCRIPTION OF THE PROPOSAL

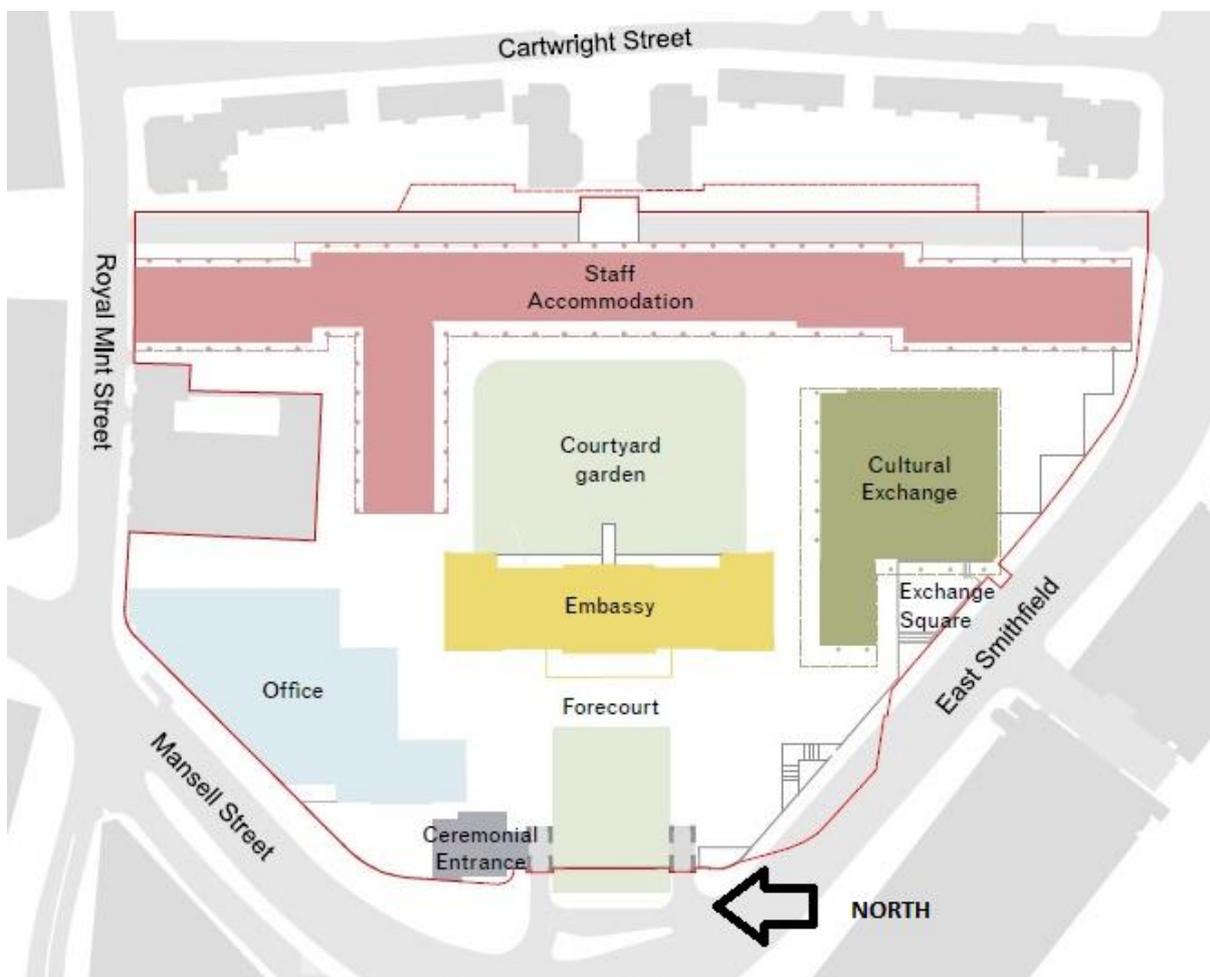


Figure 1: Proposed layout (arrow pointing north)

- 2.1 The pre-application proposal involves the refurbishment and restoration of the Johnson Smirke Building (Grade II* listed), remodelling and refurbishment of the Registry Building (Grade II listed). With remodelling and part demolition and new extensions to the 1980's-built Murray and Dexter House to provide for a new staff accommodation building and a separate described cultural exchange building.

- 2.2 The proposed development (see Figure 1 above) would consist of; the principal embassy function occupying the Grade II* listed Johnson Smirke building fronted by a private forecourt and ceremonial entrance set towards the Tower of London; office spaces within a renovated and redeveloped Grade II listed former Seaman's Registry building; a described cultural exchange building for events with a visa processing function in the foot of the building that would open off a new small public space on East Smithfield Street identified as Exchange Square. Towards the rear of the site would be a long and linear building providing the main massing, serving as embassy staff residential accommodation containing 230 individual residential flats with a private courtyard garden set before it across from the Johnson Smirke building.
- 2.3 The proposal would involve minimal external alterations to the heritage fabric of the Johnson Smirk and Seaman's Registry buildings.
- 2.4 The former conjoined Murray and Dexter House would be broken up into two distinct buildings, both stripped back to their superstructure enabling both the new residential accommodation and the cultural exchange building to have a more simplified external shape and form. The cultural exchange building is envisaged as a new signature building for the embassy. Proposed heights for these two buildings would range from 7 storeys to 8 storeys (with additional plant).

3. SITE AND SURROUNDINGS

- 3.1 The site occupies approximately 2.10 hectares, located to the north-east of the Tower of London and on the east side of the Tower Hill traffic interchange. Much of the site's western boundary is marked by an imposing wall to Mansell Street. The site is bounded to the north by Royal Mint Street and by East Smithfield to the south. To the east of the site lies a set of 5 storey (plus pitched roof) residential buildings to the west of Cartwright Street.
- 3.2 Within this street block (or land parcel) of the site (but outside the application red line site boundary) is a large and imposing telephone exchange building that opens onto Royal Mint Street and stands between the Seaman's Registry building (to the west) and the northern end of Dexter House (to the east).
- 3.3 Facing the site to the south (on the south side of East Smithfield) are two large office buildings known as Tower Bridge House and Commodity Exchange, with St Katharine Docks lying to the south of these two blocks. To the north west of the site are a series of larger office and hotel developments situated on the edge of The City. Royal Mint Street lies to the north side of the site with the Royal Mint Gardens development site located on the north side of Royal Mint Street facing the site.
- 3.4 All of the site's buildings currently stand vacant. The site was the location of the Royal Mint with the nation's coinage produced on-site from 1810 (when mint production ceased from within the Tower of London). The Royal Mint vacated the site in 1976 after production had earlier moved to Llantrisant in Wales. Aside from the listed Seaman's Registry Building and the listed Johnson Smirke Building, the remaining office spaces on-site date from the late 1980's when the Crown Estate disposed of the site and the site was redeveloped.
- 3.5 The site falls within The Tower of London Conservation Area and is within the designated immediate local setting boundary of the Tower of London UNESCO World Heritage Site. The site is within the backdrop to London View Management Framework strategic views of the Tower of London from London Bridge and from Queen's Walk on the banks of the Thames outside City Hall. The site is also within Tier I Archaeological Priority Area: Tower of London, St Mary Graces and Tower Hill.

- 3.6 The site is within the Mayor of London designated Central Activities Zone (CAZ), City Fringe Opportunity Area, and Thames Policy Area. The site falls within the Borough Local Plan designated Tower Gateway Secondary Preferred Office Location (POL), City Fringe sub-area, Green Grid Buffer Zone and is an area of poor air quality (NO₂ Annual Mean concentration greater than 40 (µgm-3)). Furthermore, the site is on land exempt from office to residential change of use permitted development rights.
- 3.7 The site benefits from excellent public transport accessibility (PTAL of 6a and 6b). The site is approximately 300 metres walking distance from Tower Hill Underground Station and approximately 50m from the secondary entrance to Tower Gateway DLR station on Mansell Street. The Inner London Ring Road (also known as A100) that crosses Tower Bridge is located immediately to the west of the site and contributes to the volume of vehicular traffic which has the effect of creating severance of the Royal Mint site from the Tower of London and this traffic contributes to a relatively hostile environment for pedestrians on both the western and southern (East Smithfield) edge of the Royal Mint site. Issues of a poor quality street environment set between the Royal Mint site, the Tower of London and Tower Hill Station are identified in the Tower of London World Heritage Site Local Setting Study and the World Heritage Site Management Plan.

4. RELEVANT PLANNING HISTORY

- 4.1 PA/16/00479: Full planning permission granted 16/2/2017 for comprehensive redevelopment of the site to provide an employment-led mixed use development of up to 81,000sq.m of B1, A1, A3 and D2 floor space, involving the refurbishment and restoration of the Johnson Smirke Building (Grade II*), remodelling and refurbishment of the Grade II façade of The Registry, with alterations and extensions to the remainder of the building, the retention, part demolition, alterations and extensions to Murray and Dexter House, the erection of a standalone four storey building within the south west corner of the site, alterations to existing boundary wall to create new access points to the site and associated public realm and landscaping and all ancillary and associated works. This permission has now lapsed.
- 4.2 PA/16/00480: Listed building consent granted on 16/2/2017 for the refurbishment and restoration of the Johnson Smirke Building (Grade II*), remodelling and refurbishment of the Grade II façade of the Registry, with alterations and extension to the remainder of the building and alterations to existing boundary wall to create new access points to the site and all ancillary and associated works. This permission has now lapsed.
- 4.3 WP/88/00107: Full planning permission granted on 31/10/1989 for use of lower ground floor as sports centre/archaeological display centre and offices (management suite).
- 4.4 PA/86/00813: Full planning permission granted on 24/04/1987 for erection of offices, residential accommodation, sports centre, museum, restaurant, retail facilities, community centre, new pedestrian subway.

5. PUBLICITY AND ENGAGEMENT

- 5.1 The applicant have undertaken their own public engagement and consultation with the local community despite the sensitivities of this application and the impacts of the recent lockdown restrictions. In November 2020, the applicant issued a first pack of information to 1,625 residents and businesses neighbouring the site. This included a letter setting out some early

information on the site, the project team and some indications of the intended design approach, as well an illustrative diagram.

- 5.2 It is understood that meetings were organised with the local Assembly Member, as well as representatives from nearby landowner Revantage, the Royal Mint Court Residents Association and the Friends of St Katharine's Dock. At each of these meetings, it is understood the project team and Embassy presented early designs for the site and answered questions. A broader group of stakeholders were also written to, including local ward councillors, community and business groups.
- 5.3 In January 2021, the Applicant issued a second pack of information to the same area of 1,625 residents and businesses. This included a further letter on the proposals which provided details of the architectural approach to each building. Further images and illustrative diagrams were also enclosed. To coincide with this letter, a consultation website (rmc-consultation.co.uk) was also launched to host all of the information issued to the community to date.
- 5.4 It is understood that further meetings have been held with representatives of the Royal Mint Court Residents Association and Friends of St Katharine's Dock this year. As part of its second pack of information, the applicant offered residents the opportunity to register for public webinars on the proposals. This is due to take place on 4 February 2021 and will involve a presentation from the project team and an opportunity to ask live questions. It is understood that the applicant has welcomed comments on the scheme through email or Freephone and has also written to a number of local schools as part of its consultation to explore potential opportunities for collaboration in the future.
- 5.5 An earlier version of the current proposal was presented to the Council's Conservation and Design Advisory Panel (CADAP) on 14th December 2020 to test the principles of the proposal. The panel's written response welcomed the opportunity to review the development proposal however they considered that the level of information provided was not limited, less than what is usually received in such design review presentations and therefore limited the degree and range of feedback they could provide on the proposal.
- 5.6 Comments from CADAP members included the following:
- Very concerned about the lack of detail particularly in terms of design detail, liable to require the scheme returning to CADAP again before submission when the design is much more developed;
 - Concerned in certain aspects that the approach of applicant team was based too much on comparing the consented scheme (now expired) with what is currently being proposed;
 - In terms of public realm, more needs to be done to fully articulate the look and feel of surrounding spaces. East Smithfield in particular provides a hostile environment and this application needs to do more to help to alleviate this issue;
 - Ensure that the public spaces do not appear to be too corporate and defensive in appearance especially where visible to the public;
 - Concerned about the way in which the hostile vehicle mitigation line could be accommodated and this needs to be delivered within the application site;
 - Queried how gatherings in the public spaces outside the application site might be accommodated;
 - Further consideration should be given to providing public benefits through the better display and interpretation of heritage assets;
 - Consideration should be given to the build loading on the surfaces set above the Abbey remains within the site;

- Architectural approach looks interesting, ordered and responsive but noted they are not fully developed at this stage nor was sufficient explanation provided how the design approach emerges from an analysis of the existing site;
- Questioned if any consideration had been given to the application of the urban greening factor for this proposal;
- Noted the asymmetrical approach of the proposed layout and questioned the way that this might compromise the front courtyard's sense of enclosure;
- Interested to understand in more detail how people will move into and around the site. It was noted that at present the design would result in a site that was quite insular;
- No detail was provided about the eastern boundary of the site (Cartwright Street).

5.7 The project architects have recently prepared new drawings with considerably more detail since the CADAP presentation. However various design and other issues remain outstanding and require much more attention and resolution. Some details of these are matters set out below.

6. RELEVANT PLANNING POLICIES AND DOCUMENTS

6.1 The Development Plan comprises:

- London Plan (2016)
- Managing Growth and Sharing the Benefits - Tower Hamlets Local Plan 2031 (2020)

6.2 The Emerging Development Plan comprises:

- The Draft London Plan (DLP)

The Mayor of London has formally approved a new London Plan, the 'Publication London Plan.' It has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 to the 'Intend to Publish' plan. However, policies in the 'Publication London Plan' subject to Secretary of State directions are considered to have only limited or moderate weight. The statutory presumption still applies to the 2016 London Plan up until the moment that the new plan is adopted.

6.3 Other policy and guidance documents relevant to the proposal are:

- National Planning Policy Framework (2019)
- National Planning Practice Guidance (updated 2019)
- National Design Guide (2019)
- GLA, Central Activities Zone (2016)
- GLA, City Fringe Opportunity Area Planning Framework (2015)
- GLA, Social Infrastructure (2015)
- GLA, Town Centres (2014)
- GLA, Accessible London: Achieving an Inclusive Environment (2014)
- GLA, Character and Context (2014)
- GLA, Sustainable Design and Construction (2014)
- GLA, Green Infrastructure and Open Environments: The All London Green Grid (2012)
- GLA, London View Management Framework SPG (2012)
- GLA, London World Heritage Sites SPG – Guidance on Settings (2012)

- GLA draft Design for a Circular Economy Statement SPD (2020)
- LBTH, Planning Obligations SPD (2016)
- LBTH, The Tower of London Conservation Area Character Appraisal and Management Guidelines (2008)
- Tower of London World Heritage Site Management Plan (2016)
- ICOMOS Guidance on Impacts on World Heritage Properties (2011)
- Tower of London WHS Local Setting Study (2010)
- BRE - Site Layout Planning for Daylight and Sunlight (2011)

7. PLANNING ISSUES

7.1 The following key planning issues have been identified at the pre-application stage.

Land Use

7.2 The site is located in a secondary preferred office location (POL) and is also within the Central Activities Zone (CAZ). Policy S.EMP1 states that Secondary POLs contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Greater weight is given to office and other strategic CAZ uses as a first priority as proposed uses. Although residential uses can be accommodated, the policy states that these should not exceed 25% of the floorspace provided. The existing use of the site is office (B1 use class employment space) and it is also understood that there was a gym on the site.

7.3 Policy D.EMP3 protects against the loss of employment space within POLs. However policy D.EMP4 states that redevelopment within Secondary POLs can be led by non-residential strategic functions of the CAZ. Therefore it is considered that loss of the employment space on-site could be acceptable subject to provision of strategic CAZ uses on the site.

7.4 Draft London Plan Policy SD4, in supporting text para 2.4.4 sets out the strategic functions of the CAZ, including diplomatic organisations such as embassies. In light of the above, the proposed embassy (sui generis use class) could be regarded as acceptable in principle, subject to compliance with all other policy considerations.

7.5 Policy S.EMP1 states that residential uses should not make up more than 25% of the floorspace provided. The redeveloped site is proposed to contain approximately 57,533sqm gross external area (GEA) with staff accommodation accounting for approximately 32,819sqm GEA. This would equate to 57% of the floorspace. It is understood that the residential uses on-site would be ancillary to the main embassy use. The use of the residential accommodation only for staff of the embassy would need to be secured by condition, subject to approval. Set within this context the ancillary residential use is not considered to give rise to any considerable land use policy issues.

Heritage & Design

7.6 Planning policies requires high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places that safeguard and where possible enhance the setting of heritage assets.

7.7 Paragraph 193 of the NPPF states *'when considering the impact of a proposed development 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.' Furthermore paragraph 196 of the NPPF states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.' An assessment of harm to heritage assets and public benefits of the proposal will need to be undertaken as the scheme crystallises.

- 7.8 Policy S.DH3 states that proposals must preserve or, where appropriate, enhance the borough's designated heritage assets in a manner appropriate to their significance. In light of the above, the Royal Mint Site is considered to be a nationally significant heritage asset.
- 7.9 In relation to The Tower of London Conservation Area (see Figure 2), Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area. In relation to listed buildings and structures on-site and nearby, Section 66 of the Act states that special regard shall be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

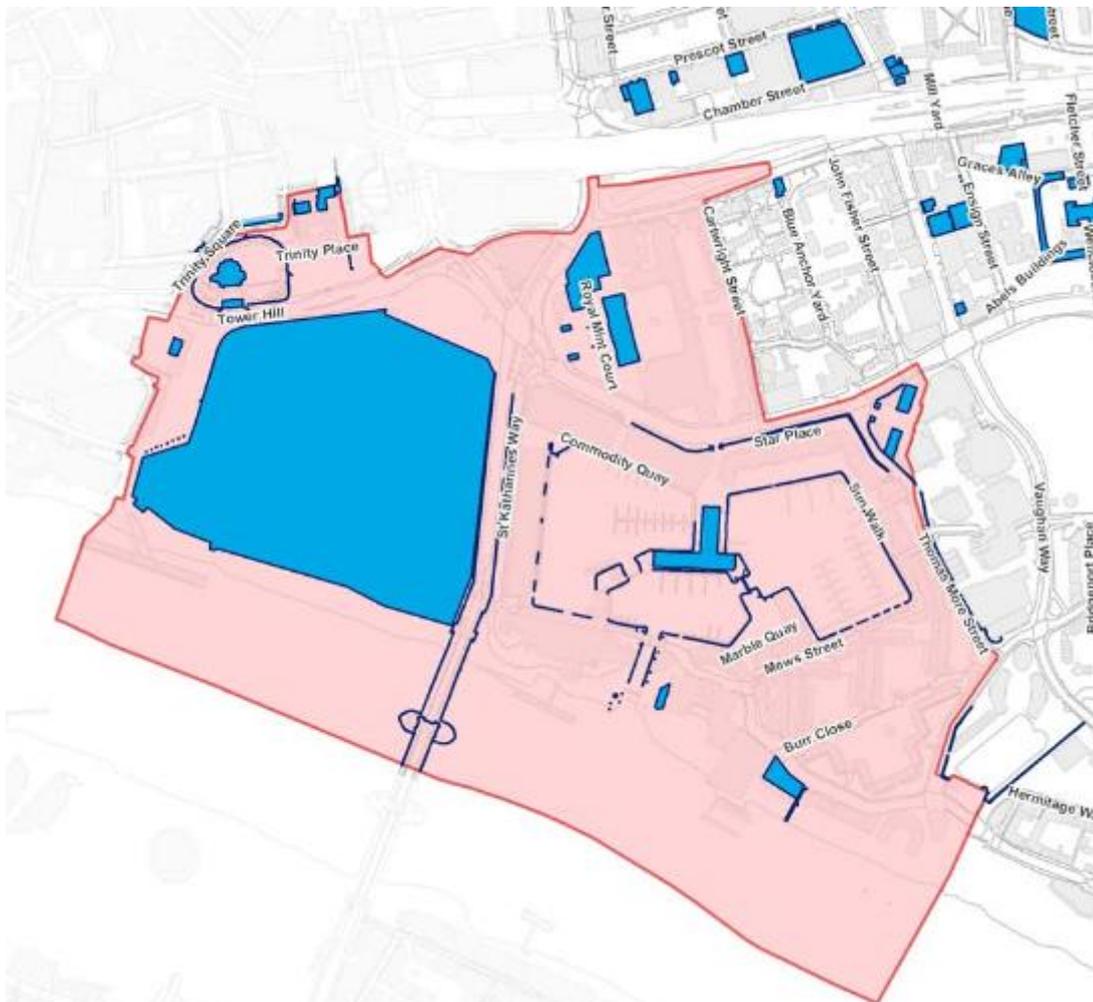


Figure 2: The Tower of London Conservation Area (pink) and listed buildings (blue)

- 7.10 Works to the listed Johnson Smirke and Seaman's Registry buildings are generally considered to be minimal and sensitive. The Johnson Smirke building would be refurbished and internally reconfigured. With the Seaman's Registry, the 1980s metal façade facing over

Mansell Street would be replaced with a more sensitive brick face, as well as general refurbishment. Officers are content with the physical works to the listed buildings generally in relation to preserving or enhancing these assets.

- 7.11 Works to the former Murray and Dexter House would involve some increased massing and height around the site. Heights have been reduced from the start of the pre-application process, particularly at Royal Mint Street. These proposals would likely impact upon the setting of listed buildings, the wider conservation area, as well as the setting of the Tower of London World Heritage Site. Policy S.DH5 states that proposals impinging on strategic or significant views around the Tower of London are required to demonstrate how they will conserve and enhance the outstanding universal value of the world heritage site.

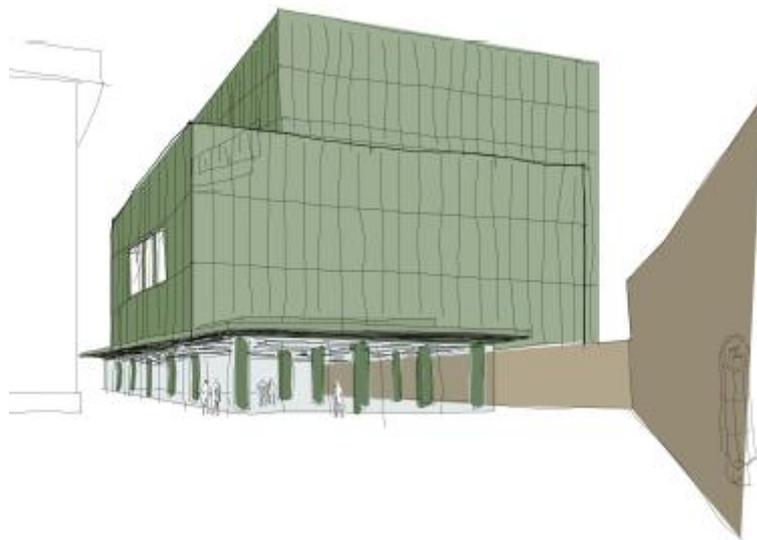


Figure 3: Proposed Cultural Exchange building finished in green ceramic

- 7.12 The proposed Cultural Exchange building has been designed as the most prominent new intervention for the site, separated from the existing Murray and Dexter House. Figure 3 above shows the latest iteration received recently which envisages a potentially extremely bold and striking green ceramic building. This would be prominent on East Smithfield and surrounding local views. Officers require high quality CGI visuals and significant further detail on the material and views in order to be able to support such a prominent proposal in this historical environment.
- 7.13 Policy D.DH4 states that development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. In relation to LVMF strategic views from London Bridge (LVMF View 11B.2) and from Queen's Walk (View 25.A) on the banks of the Thames outside City Hall, the pre-application scheme has evolved to reduce visibility.
- 7.14 In relation to local views, including looking out from the top of the eastern walls of the Tower of London, the proposed massing does still raise some concerns viewed in conjunction with the neighbouring Royal Mint Gardens development across the road. Further analysis of proposals in relation to local views is required, such as of the Johnson Smirke frontage, the proposal viewed from the rear on Cartwright Street and upon East Smithfield, in particular the Cultural Exchange building, both to the street itself and in relation to the return elevation of the Johnson Smirke building.

- 7.15 Officers have raised concerns throughout the pre-application process in relation to lack of detail on architecture and design. The proposed adaptive reuse of Murray and Dexter House is supported in principle in relation to replacing the very busy existing elevation which would benefit from an effective hierarchy, rhythm and contrast. Finessing and rationalization of the rooftop plant massing and design should be further prioritised.

Archaeology and display and interpretation of site's heritage assets

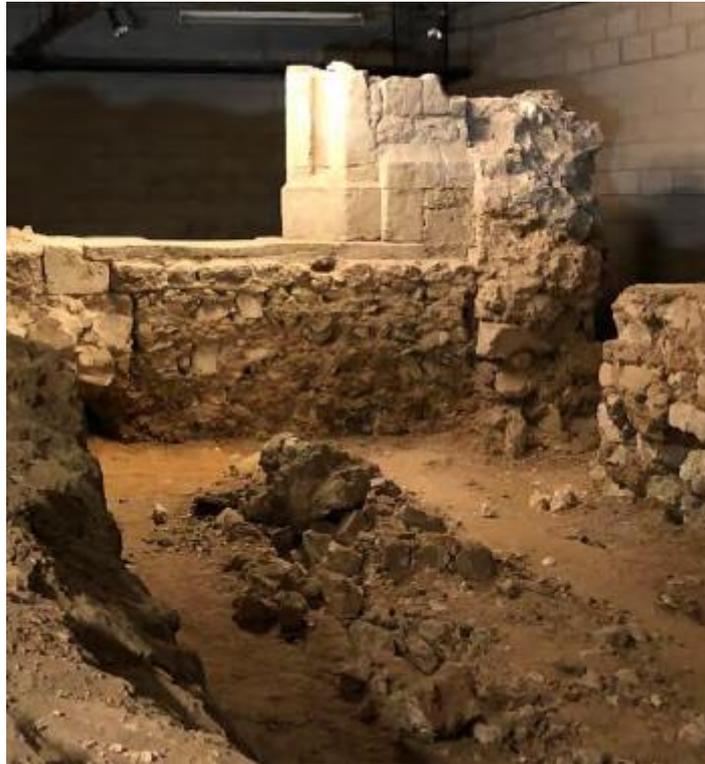


Figure 4: Some of the existing preserved ruins of Cisterian Abbey (in basement)

- 7.16 The site is in an area of designated archaeological importance (Tier I Archaeological Priority Area: Tower of London, St Mary Graces and Tower Hill). The site was subject to a very extensive archaeological dig prior to construction of the office buildings on-site in the late 1980's and its archaeology is recognised by the Greater London Archaeology Advisory Service to be of national significance containing well preserved ruins of a Cistercian Abbey (see Figure 4) as well as other archaeology (not all excavated) including Black Death burial grounds and archaeology from the period when the site was the Royal Navy's 1st Victualling (goods) supply yard (in late 16th, 17th and early 18th century).
- 7.17 The proposals involve preservation of existing ruins along with semi-public views available to those who would enter the Cultural Exchange building from glazed openings within the entrance lobby, security area and transition space. Proposals also involve an online presence. GLAAS have had sight of proposals and have requested that the scheme delivers a compelling package of heritage moves in order to ensure that the site's historic assets are explained and suitably better revealed to the public given it is such an important site.
- 7.18 Officers are engaging with the Museum of London (MoL) to explore the potential to create a permanent exhibition within their new museum building presently under construction at West Smithfield to display material and tell the history of the site. In addition, officers are exploring with MoL the idea that the new museum could feature a display space to celebrate the history and contribution the Chinese community have made to London over the centuries,

including its first beginnings in Limehouse and Poplar. The applicant has also mentioned the potential of providing further exhibition space at another, presently undisclosed, site.

- 7.19 Considering the significance and extent of archaeological remains on-site, the proposals are not considered to sufficiently enhance or better reveal the heritage assets at present. Previous consents in 1986 and 2017 included provisions for public access, exhibition and interpretation space on-site. The current proposals provide minimal provisions for public views or access to the history or rich archive of the site.

Public Realm

- 7.20 Policy S.DH5 states that development within the vicinity of the Tower of London is required to demonstrate how it will improve local pedestrian and cycle access routes, particularly signage and way-finding in the surrounding area.
- 7.21 Policy D.DH2 states that development is required to contribute to improving and enhancing connectivity, permeability and legibility across the borough. City Fringe sub-area development principles within the Local Plan include contributing to new and improved high quality legible routes and public realm in the area, as well as improving public realm along main strategic connections and links, including particularly between Tower of London and Aldgate.
- 7.22 The Tower of London World Heritage Site Management Plan describes how the local setting of the Tower comprises the spaces from which it can be seen from street and river level, and the buildings that enclose, or provide definition to, those spaces. It is considered that the buildings that lie within the boundary of the local setting of the Tower influence the experience of the Tower by both defining the character of local spaces and forming the immediate backdrop to the Tower. The Site Management Plan further sets out how the local public realm is dominated by traffic and poor quality street clutter which breaks the quality between these two historic sites both containing buildings of national symbolic significance.
- 7.23 The site as a former Royal Mint is a historically heavily defensive island, enclosed to the north, west and south by a historic boundary wall and to the east by railings and a service road. The two grand gated porticos provide an entrance to the front forecourt set before the principal elevation of the Johnson Smirke Building and facing out towards the Tower of London.
- 7.24 The previously consented scheme from 2017 involved proposals which would have allowed public access to interact, freely move within the site, enjoy and better reveal the site's designated heritage assets. The current proposals do not provide the public benefit of access to the site. The proposals would increase the security and defensiveness of the site through a series of interventions including vehicle mitigation bollards within the public realm, a new wall at East Smithfield, and new gates serving the two entrances to the service road accessed from Royal Mint Street and East Smithfield.
- 7.25 The space outside the front porticos is proposed to be rationalised and simplified with some levelling, shared surfaces to allow vehicles to turn and introduction of raised planters. The Exchange Square area would also provide some increased and better landscaped public space although it is understood that this would mainly be utilised by those queuing for visa applications. A staff entrance is planned (see Figure 3) to the rear of the proposed residential building that would be accessed off Cartwright Street via an existing well designed if underutilised hard landscape pocket public square.



Figure 3: New residential accommodation building (to rear) showing proposed staff entry to Cartwright Street

- 7.26 Officers understand the necessary operational imperative for an embassy to be secure and also recognise existing built features on the site edge including high walls on the western edge of the site limit views into the site and make for an inactive back of pavement experience. All of which are challenging factors when combined with the level of vehicular traffic on the carriageway. However officers still lack sufficient detail to be sure a holistic and sufficiently imaginative approach is being taken to improve the urban condition/public realm on the edge of the application site which is of concern generally; especially in the context of the scheme placing reliance on surrounding roads and public pedestrian spaces. Compliance with policies D.DH2 and S.DH5 are relevant in this context.
- 7.27 The impact on the public realm and local highways network in relation to potential protests needs to be further developed to ensure that the proposal does not adversely impact on surrounding local and arterial roads or indeed upon residential neighbours. Input from the Secure by Design Metropolitan Police team will be necessary in order to ensure that security measures are adequately taken into account. Continued positive and responsive engagement from the applicant's team with Transport for London surrounding the public realm will also be important.

Neighbouring Amenity

- 7.28 Planning policy seeks to protect and where possible improve the amenity of surrounding neighbouring properties and provide a good standard of amenity for all future occupants of development proposals.
- 7.29 No detailed information has been provided in relation to impacts on neighbours thus far. In contrast to the lapsed 2017 consent, the development and windows would be set further away from existing residential homes facing the site on Cartwright Street, more closely echoing the existing separation distances found with Dexter and Murray House, however the

scheme would introduce height in this location and interfacing windows, some with only 13m separation, between existing and proposed residential uses, so careful attention to design detailing will be important to avoid potential privacy issues.

7.30 Heights of rear boundary treatments in relation to neighbouring homes and gardens also needs to be taken into consideration. The increased height at Royal Mint Street is liable to have adverse impacts in terms of daylight/sunlight to the recently completed residential homes within the Royal Mint Gardens development.

7.31 Officers await within the pre-application process, a daylight and sunlight report in accordance with BRE guidance in order to fully understand these matters. More generally officers will be looking for the applicant team to set out and demonstrate that amenity impacts to residential neighbours are minimised as much as is practicable.

Transport and Servicing

7.32 Planning policies promote sustainable modes of travel and limit car parking to essential user needs. They also seek to secure safe and appropriate servicing.

7.33 The site benefits from excellent public transport accessibility (PTAL of 6a and 6b). The scheme proposes 165 car parking spaces located within the basement. Such a high level of high level of car parking provision is at odds with Draft London Plan policy on these matters. However, it is recognised an embassy function does potentially impose very particular requirements for car parking. In addition evidence has been presented of how the scheme will release from requirement other car parking facilities associated with the existing embassy site in the London Borough of Westminster, and so could reduce, at the London level, the embassy's demand on on-street car parking capacity.

7.34 It is understood that the proposal would require some alterations to the junction layout at East Smithfield in order to facilitate two-way vehicular movements from the rear service road. Further road layout alterations are proposed including to the taxi rank at the site frontage which would be amalgamated to a shared surface system.

7.35 Taking into consideration the increased impact on the local highways network which is already heavily trafficked and polluting, along with the non-compliance with car parking standards and the applicant's expressed ambition for the proposal to achieve excellence in terms of its environmental sustainability credentials, officers are seeking the scheme to do more to integrate the site better into the surrounding public realm and enhance the pedestrian experience for people walking around the edge of the site.

Environment

7.36 Planning policies seek to secure a range of sustainable development outcomes including net biodiversity gains whilst not impacting on existing protected species; the implementation of efficient energy systems which seek to minimise carbon emissions and to secure effective strategies for addressing matters relating to contaminated land and sustainable urban drainage. As already mentioned above, the applicant has expressed ambition for proposals to achieve excellence in terms of its environmental sustainability credentials, however this has not been fully evidenced in proposals to date.

7.37 The current proposal does not achieve the required 0.3 Urban Greening Factor score and the scheme should be amended to ensure that this is achieved. Plans include the removal of some trees around the site and lifting the crowns of the two large feature trees to the site forecourt – arboricultural surveys are necessary to ensure that these works would be appropriate.

- 7.38 The applicant team has determined that the proposals constitute Environmental Impact Assessment (EIA) development. An Environment Statement (ES) must therefore be submitted to support the planning application and include the assessment of the likely significant effects of the proposal.

Infrastructure Impact

- 7.39 The proposed development will be liable to the Council's and the Mayor of London Community Infrastructure Levies (CIL) and planning obligations to be secured under Section 106 of the Town and Country Planning Act 1990 (as amended).

8. RECOMMENDATION

- 8.1 The Committee notes the contents of the report and pre-application presentation.
- 8.2 The Committee is invited to comment on the issues identified and to raise any other planning and design issues or material considerations that the developer should take into account at the pre-application stage, prior to submitting a planning application.

9. APPENDIX – IMAGES

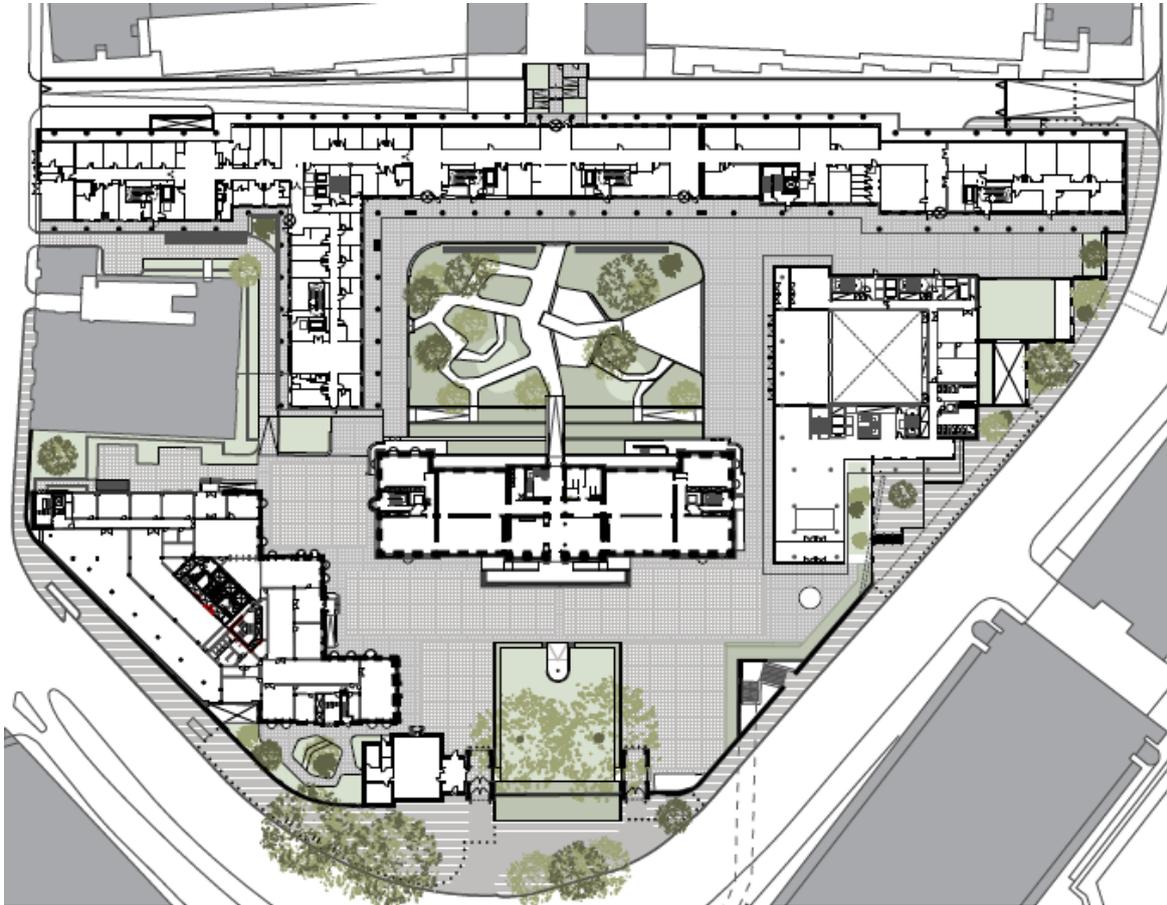


Image 1: Site masterplan



Image 2: Existing site massing

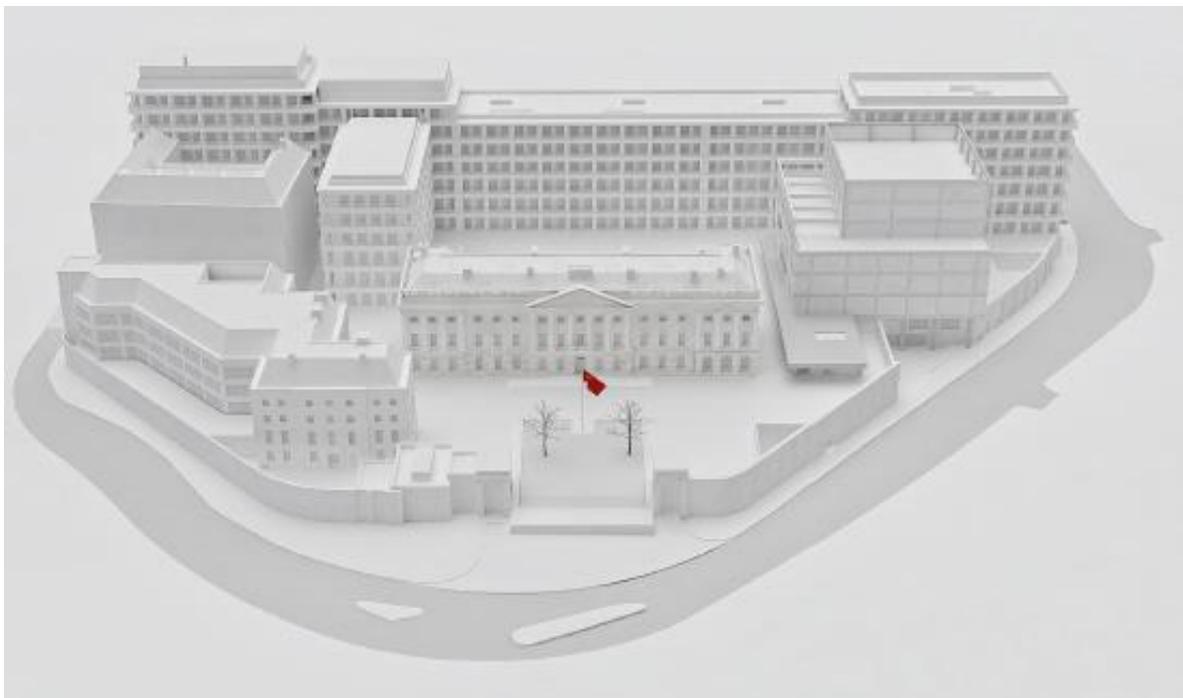


Image 3: Proposed massing

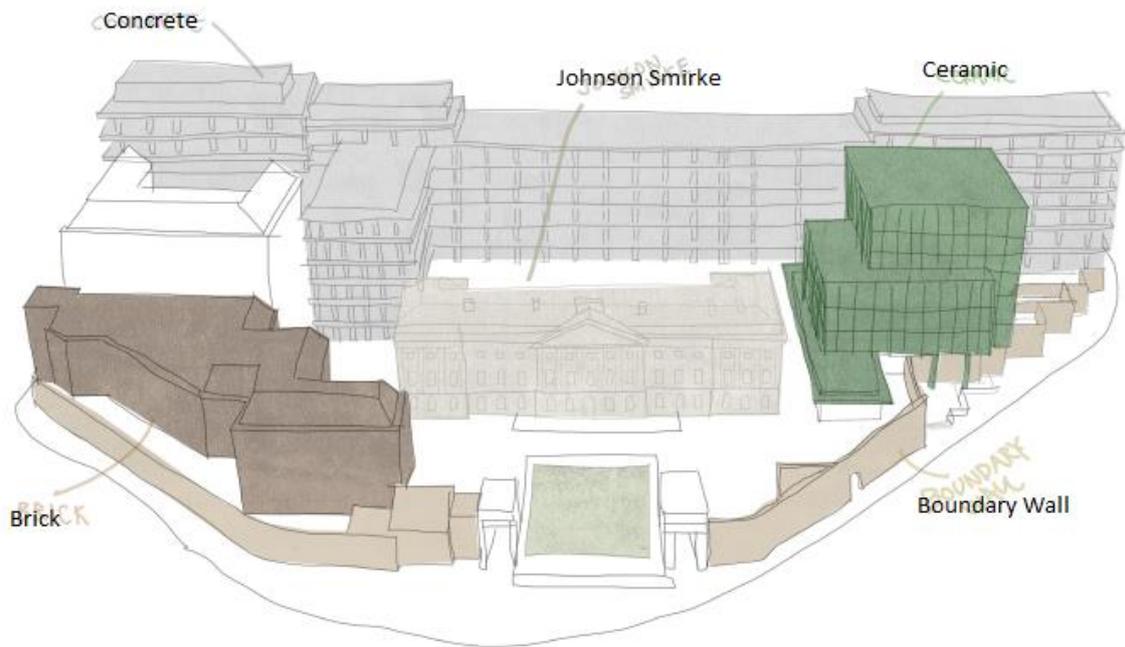


Image 4: Proposed materials

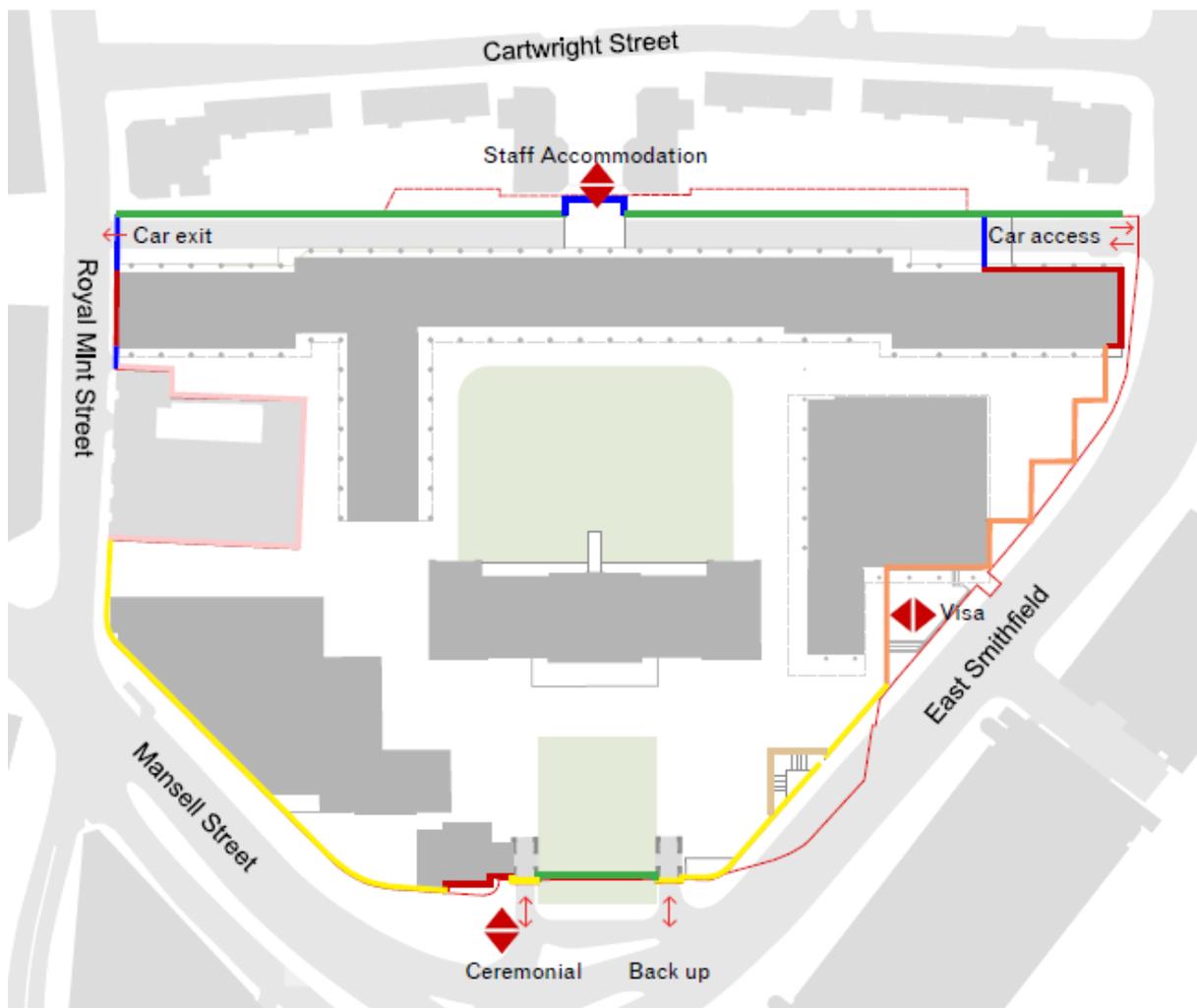


Image 5: Proposed accesses and boundary treatments



Image 6: Proposed west elevation



Image 7: Proposed east elevation



Image 8: Proposed north elevation

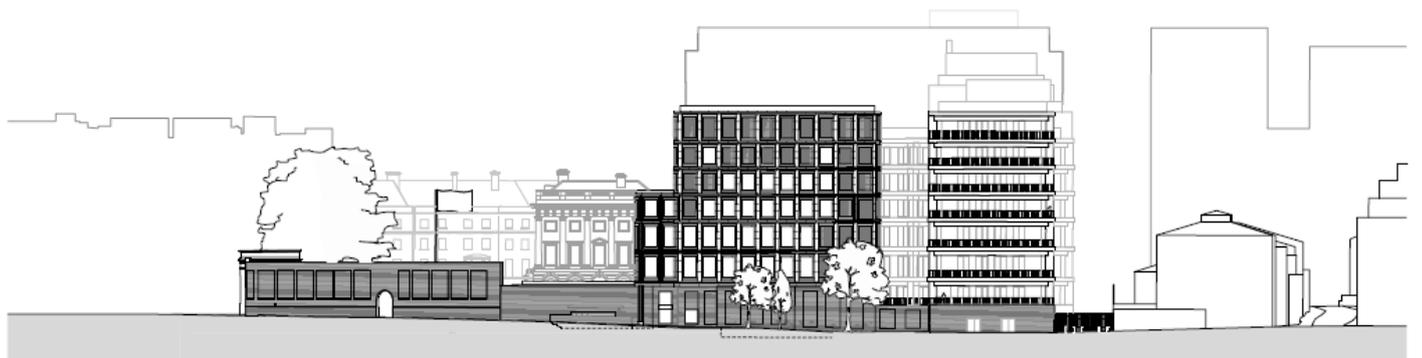


Image 9: Proposed south elevation



Image 10: Existing East Smithfield relationship (Google)



Image 11: Proposed Exchange Square / East Smithfield relationship with ruins



Image 12: Existing site of proposed Exchange Square (Google)

Building idea

Massing

- Respond to existing wall/street
- Existing structure
- Current floor plans
- Relationship with Johnson Smirke

Architectural Expression

- Ceramic tiles
- Natural texture / human touch
- Building as a gift from China to London
- Cultural exchange
- Special building in the campus
- Draws on shared traditions on Chinese and British manufacturing heritage



Indicative ceramic material sample

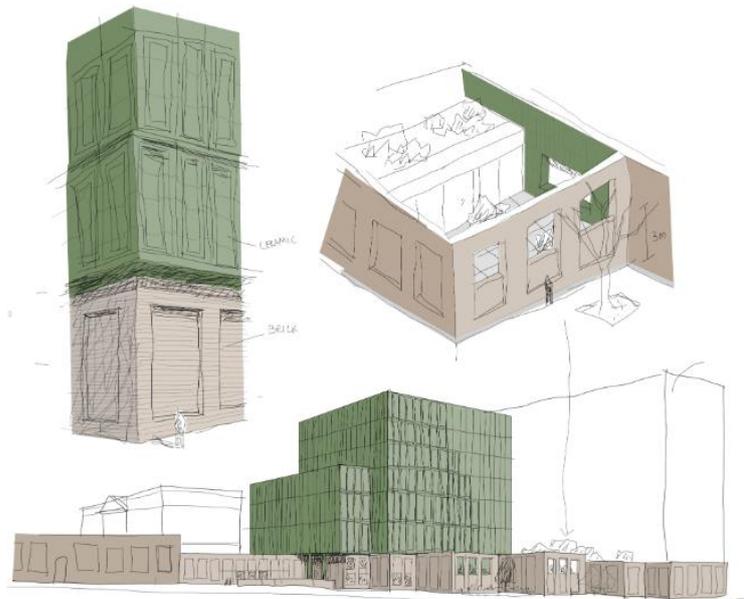


Image 13: Proposed Cultural Exchange building idea

Archaeology

Museum of London Discussion.

Positive discussion; however, further discussion proposed in relation to:

- Online options
- Security considerations
- Display/exhibition space within the Museum of London
- Display/exhibition space at another location.
- Limited display of site materials within the embassy;
- Possibilities of interpretative material within Visa Square
- Viewable areas of the ruins
- Mix of online and physical presentation benefits

Accessible and viewable areas:
1 Interpretative material within Visa Square
2 Viewable areas of the ruins and exhibition space
3 Area of ruins under display
— Glazing looking onto ruins

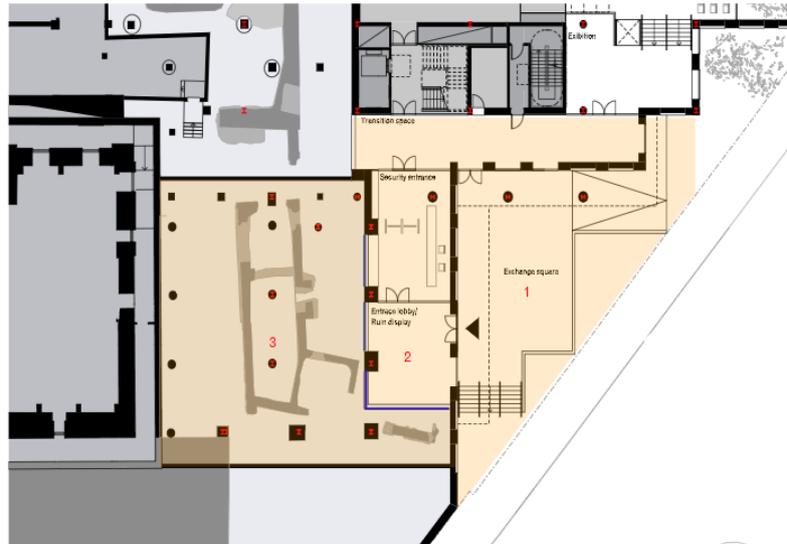


Image 14: Proposed archaeological offer



Image 15: Proposed CGI view of site frontage



Image 16: Proposed CGI view from walls within Tower of London