

**Application for Planning Permission**

Reference	PA/21/01327 (Full Planning Permission) & PA/21/01349 (Listed Building Consent)
Site	Royal Mint Court, London, EC3N 4QN
Ward	Whitechapel
Proposal	<p>Redevelopment of the site to provide an embassy (Sui Generis use class), involving the refurbishment and restoration of the Johnson Smirke Building (Grade II listed), partial demolition, remodelling and refurbishment of Seaman's Registry (Grade II listed), with alterations to the west elevation of the building, the retention, part demolition, alterations and extensions to Murray House and Dexter House, the erection of a standalone entrance pavilion building, alterations to the existing boundary wall and demolition of substation, associated public realm and landscaping, highway works, car and cycle parking and all ancillary and associated works.</p> <p>[This application is accompanied by an Environmental Statement]</p>
Summary Recommendation	Grant planning permission and listed building consent subject to conditions and planning obligations
Applicant	Chinese Embassy UK
Architect/ agent	David Chipperfield Architects/ DP9
Case Officer	Rikki Weir
Key dates	<ul style="list-style-type: none">- Application registered as valid on 11/06/2021- Public consultation (including Environmental Impact Assessment (EIA)) on 30/06/2020- Public re-consultation in relation to amendments on 13/01/2022

EXECUTIVE SUMMARY

The Local Planning Authority has considered the particular circumstances of this application against its adopted planning policies as set out in the Tower Hamlets Local Plan 2031 (2020), and it has also assessed the application against strategic development plan policies as set out in the London Plan (2021) and National Planning Policy Framework (NPPF) plus supplementary planning guidance including the Tower of London Conservation Area Character Appraisal and Management Guidelines (2008), the Mayor of London's City Fringe Opportunity Area Planning Framework (2015), London View Management Framework SPG (2018) and London World Heritage Sites SPG (2012).

The proposed development is for the largest embassy in the United Kingdom. The application has been submitted by the Chinese Embassy in the UK. If planning permission is granted, the

use of the site as an embassy is not exclusive to any particular nation (or nations). In terms of planning assessment, the nation(s) that will occupy the site is not a material planning consideration and nor is the applicant who submits the application. The principle of the development in land use policy terms is acceptable as embassies are identified as an appropriate strategic land use function for a site such as this located in the Central Activities Zone, including the provision of ancillary residential accommodation for embassy staff and visitors to the embassy. The layout, function and design of the scheme would provide a satisfactory quality of accommodation in respect of the ancillary residential units serving the embassy function.

In terms of impacts on neighbouring amenity, the scheme would not introduce any increased overlooking to existing neighbours to the rear of the site on Cartwright Street compared to the existing situation with the separation distance being either maintained or improved over the existing relationship. In respect of daylight/sunlight, the scheme would give rise to some loss of daylight but these impacts are, on balance, considered not unduly adverse and acceptable in the site's context and with due regard to the specific design features (self-obstructing balconies and overhanging eaves) of neighbouring buildings.

Works to listed buildings and structures within the site (Grade II* listed Johnson Smirke building, Grade II listed Seaman's Registry and Grade II listed entrance lodges) would involve refurbishment including improved access, minimal external alterations, internal remodelling, and incorporation of a more sensitive palette of materials to replace the 1980s façade facing Mansell Street, ensuring that the setting and significance of listed buildings would be preserved in accordance with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

In respect of Dexter and Murray House, the existing massing would be broken up (opening new views to the Johnson Smirke building) and remodelled into 'Embassy House', a rationalised and more sensitively massed building, alongside a 'Cultural Exchange' building which would be a bold green/ grey ceramic building with celadon-coloured glazing. The proposal would serve as a new landmark building of true distinction and architectural quality. Overall, the proposals would result in the provision of buildings with a more sensitive scale, massing and design and would preserve and enhance the character and appearance of the Tower of London Conservation Area in accordance with section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The proposed scheme would include improvements to the public realm (including a comprehensive local urban design study) secured through conditions and legal obligations would enhance the relationship of the site with the Tower of London World Heritage Site. There would be no additional harm to London View Management Framework protected views beyond the existing situation.

Great importance and weight needs to be given to the impact of the scheme upon heritage assets. Some harm has been attributed to below-ground archaeological heritage assets but this would be outweighed by public benefits of the scheme, which include regeneration of the site in a sensitive manner to enhance the relationship with above-ground heritage assets, employment opportunities, public realm improvements and heritage presentation space. The heritage benefits of the scheme include a Heritage Interpretation Centre and viewing windows of archaeological ruins from East Smithfield that, taken together, would allow the public to meaningfully engage with the site's history and archaeology which is of national significance. Additional heritage display space would also be available to the public within the 'Cultural Exchange' building.

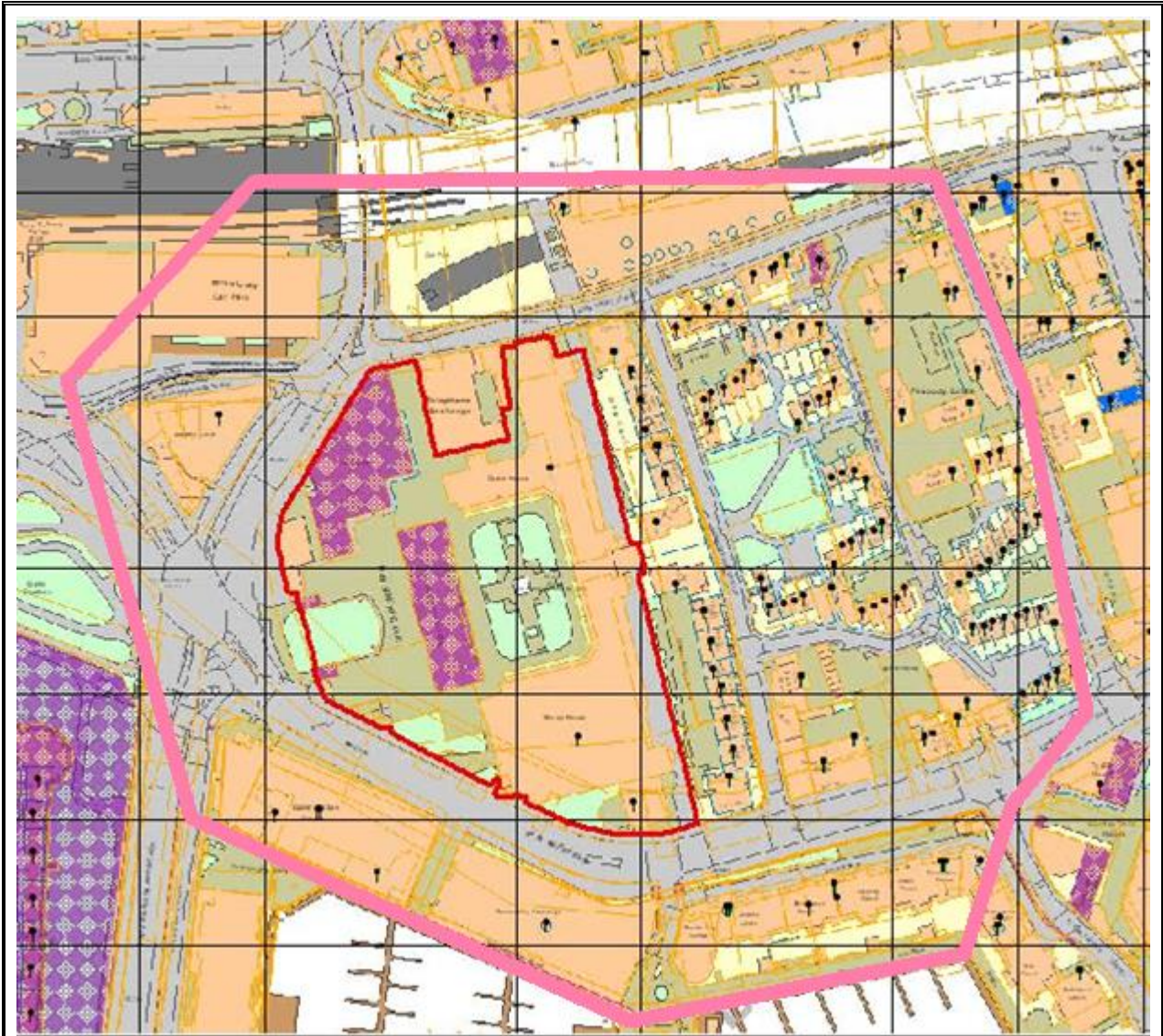
A number of objections been received relating to security issues. The Metropolitan Police Service have provided specific security advice on this planning application and have made a series of recommendations in relation to security pertaining to the site surroundings and these







recommendations would be secured by planning conditions or obligations, should planning consent be granted.

In respect of highways and transportation, with mitigation measures (including a car parking management plan and an event/protest management plan) and improvements to the surrounding highway network (including enhanced paving around the site, works to crossings and a subway and hostile vehicle mitigation bollards) secured by planning condition and legal agreement, the scheme is considered to be acceptable. Adequate facilities for cyclists, cars and servicing would be provided by the development, on-site. In terms of energy use, carbon reduction, and ecological enhancements to biodiversity, the scheme would provide a sustainable form of development. The sustainable retention and reuse of the superstructure of Dexter and Murray House is supported.

Overall, the proposal is considered to be well designed and officers are satisfied that the proposed development would deliver a high quality, well integrated, inclusive and sustainable place. It is on this basis that the grant of planning permission, subject to conditions and obligations, is recommended. Listed Building Consent, subject to conditions, is also recommended.

SITE PLAN



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

Planning Applications Site Map PA/21/01327

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



London
Borough of
Tower Hamlets

Date: 23 November
2022

1. SITE AND SURROUNDINGS

- 1.1 The site (outlined in red in Figure 1) 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 2-5 storey (plus pitched roof) residential buildings located on the western side of Cartwright Street.
- 1.2 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).

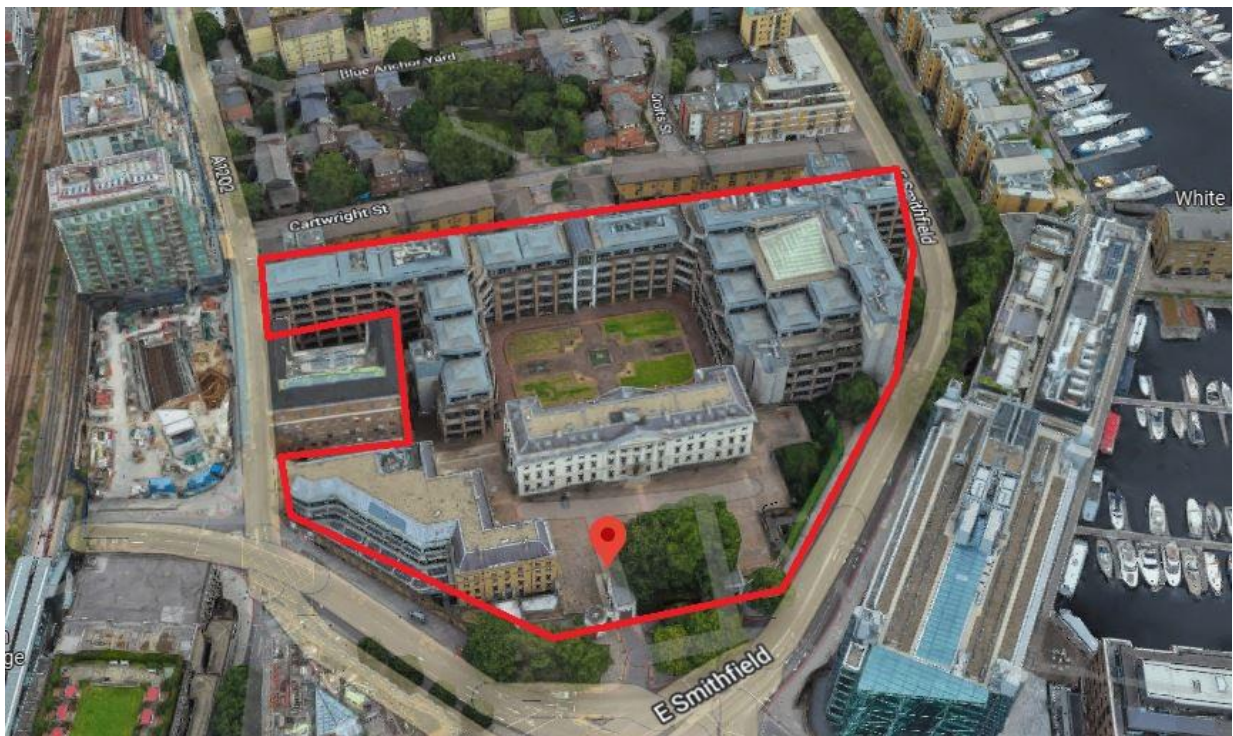


Figure 1: Aerial photograph of the site (Google) looking toward the east

- 1.3 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 adjacent to Sanderling Lodge (a residential building) with St Katharine Dock lying to the south of these buildings. 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 application site.
- 1.4 All of the site's buildings currently stand vacant. The site contains the preserved ruins of a Cistercian Abbey (or the monastery known as Eastminster) from the 1300s as well as other archaeology (not all excavated) including remaining in situ Black Death burial grounds (from the 1300s) and archaeology from the period when the site was the Royal Navy's first victualling (food, drink and supplies) yard (in late 16th, 17th and early 18th century). 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 Grade II listed Seaman's Registry Building and the Grade II* listed Johnson Smirke Building, the remaining office spaces on-site date from the late 1980s when the Crown Estate disposed of the site and

it was redeveloped. The entrance lodges and two cast iron lampstands within the site are also Grade II listed.

- 1.5 The site falls within The Tower of London Conservation Area and is within the designated Immediate 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 the Former City Hall. The site is also within Tier I Archaeological Priority Area: Tower of London, St Mary Graces and Tower Hill. In proximity to the site, the boundary walls and gate piers around the perimeter of St Katharine's Dock are also Grade II listed.
- 1.6 The site is within the Mayor of London's 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 (µg_m⁻³)). Furthermore, the site is on land exempt from office to residential change of use permitted development rights.
- 1.7 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.

2. PROPOSAL

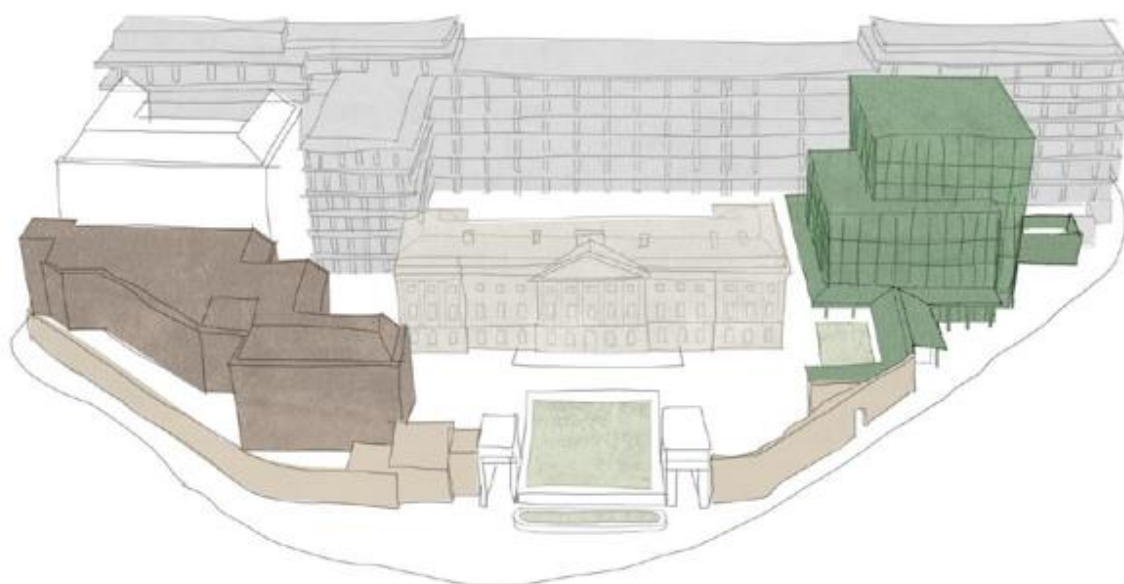


Figure 2: Site overview of the proposals

- 2.1 The proposed development (proposal overview shown in Figure 2) would consist of; the principal embassy function occupying the Grade II* listed Johnson Smirke building fronted by a private forecourt and ceremonial entrance (shown in Figure 3) set in the direction of the Tower of London with ancillary office space within a renovated and redeveloped Grade II listed former Seaman's Registry building. The proposal would involve minimal external alterations to the heritage fabric of the Grade II* Johnson Smirke and Grade II listed Seaman's Registry buildings.



Figure 3: Proposed site frontage facing west toward Tower Hill interchange

- 2.2 The former conjoined Murray and Dexter House would be broken up and remodelled into two distinct buildings, both stripped back to their superstructure, enabling ancillary residential accommodation within a new 'Embassy House' and a 'Cultural Exchange' building designed for embassy events along with a visa processing function in the foot of the building and a heritage interpretation pavilion that would open off a small public open space on East Smithfield.
- 2.3 The Cultural Exchange building would have a new architectural façade treatment with a more simplified external shape and form and is envisaged as a new signature building for the embassy. Towards the rear of the site, Embassy House would be a long and linear building serving as embassy staff residential accommodation containing 225 individual, ancillary residential flats with a private courtyard garden set before it behind the Johnson Smirke building.
- 2.4 Proposed heights for the Cultural Exchange and Embassy House would range from 7 storeys to 8 storeys (with additional plant). The highest building point would be approximately 35.4m (existing is 32.8m) from street level on Royal Mint Street with a small chimney rising to 37.4m.

3.0 RELEVANT PLANNING HISTORY

- 3.1 PA/16/00479: Full planning permission 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. Permitted – 16/02/2017 (This permission has now lapsed – proposed visual shown in Figure 4)



Figure 4: Proposed visual of the 2017 lapsed consent for an office-led mixed-use redevelopment

- 3.2 PA/16/00480: Listed Building consent 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. Permitted – 16/02/2017 (This permission has now lapsed)
- 3.3 WP/88/00107: Use of lower ground floor as sports centre/archaeological display centre and offices (management suite). Permitted – 31/10/1989
- 3.4 PA/86/00813: Erection of offices, residential accommodation, sports centre, museum, restaurant, retail facilities, community centre, new pedestrian subway. Permitted 24/04/1987
- 3.5 PA/86/00811: Part demolition and extension of Seaman's Registry for use as offices including landscaped forecourt and subway entrances. Permitted – 24/04/1987
- 3.6 PA/86/00809: Part demolition and extension of Seaman's Registry, refurbishment of forecourt, boundary wall and entrance lodges (Listed Building Consent). Permitted – 24/04/1987
- 3.7 PA/86/01114: Erection of offices, museums, sports centre, residential accommodation, restaurant, retail facilities, community centre, public house, car parking including a new pedestrian subway under East Smithfield. Permitted – 21/01/1987
- 3.8 PA/86/00815: Erection of offices, museums, sports centre, residential accommodation, restaurant, retail facilities, community centre, public house, car parking including a new pedestrian subway under East Smithfield. Permitted – 21/01/1987

4. STAKEHOLDER ENGAGEMENT AND PUBLICITY

- 4.1 The applicant undertook extensive pre-application engagement with the Council, local residents, residents groups and other relevant stakeholders and, it is understood, have also had some degree of engagement with local residents since submission of the planning application. This included online and in-person meetings, letters and a consultation website. The Statement of Community Involvement (SCI) submitted with the planning application provides a more detailed summary of the consultation to date and ongoing engagement for the future.
- 4.2 In addition to this, the applicant presented their proposal at pre-application stage to the Council's Conservation and Design Advisory Panel (CADAP) on 14th December 2020 and to the Council's Strategic Development Committee on 8th February 2021.
- 4.3 At application stage, a total of 972 neighbouring properties were posted notification letters by the Council in June 2021 with the consultation boundary going as far east as properties on John Fisher Street (see consultation boundary map above). The extent of neighbours consulted on the application by the Local Planning Authority extends beyond those required by legislation and the Council's own published Statement of Community Involvement. Four site notices were erected in close proximity around the site in July 2021. The applications were also advertised in the local press.
- 4.4 Statutory consultees and residents that had submitted a representation were also re-consulted in January 2022 in respect of amendments to the scheme and a local press advertisement also posted.
- 4.5 A total of 51 letters of representation have been received in objection and 2 general comment. Objections have been received from residents' groups at St Mary Grace's Court, Royal Mint Estate and St Katharine Docks as well as Tower Hamlets Homes and officers have attended a number of meetings with these groups, arranged by the LBTH Community Safety team to discuss a range of concerns.
- 4.6 The material planning considerations that were raised following both initial consultation and re-consultations are outlined below.
- 4.7 It should be noted that whilst the below provides a summary of the responses received, officers have had regard to the full submissions when assessing the proposed development.

Public responses in objection

- Inappropriate location for any embassy
- Concerns over construction traffic, air quality, noise and disturbance
- Impact on daylight, sunlight and overshadowing
- Mutual overlooking from new balconies to neighbours
- Lack of pre-application direct consultation by applicant
- No provision has been committed for improvements to the public realm
- No provision for safety, security, threat analysis or mitigation has been undertaken.
- No provision for impacts on traffic, parking or shared travel infrastructure has been considered
- Insufficient car parking
- Premises will be turned into a fortress and would be a terrorist target
- Increased surveillance by camera resulting in loss of privacy
- Impact on safety and security of residents, nearby office workers and the public
- Highways network is already congested and could be worsened and closed
- Heritage could be destroyed with a terrorist attack

- Concern with security and possible terrorist attacks such as bomb blasts. Request that a bomb blast and acoustic green wall and replacement of neighbouring doors, windows and locks, as well as 2 new gardens are provided
- Loss of public access to open spaces within the site
- Huge impact of protests on the surrounding area
- Lead to increased operational car and cycle traffic from the site
- Local GP practices will struggle
- Lack of consultation
- Measures should be adopted to avoid light overspill
- Concerns on health impact assessment
- Concerns on flooding and wastewater
- Not enough suitable infrastructure to deal with this use

Public general comments:

- Would like to know when the scheme is going to committee and when and how to view or attend

Non-material considerations raised:

- Dangerous levels of vehicle noise and pollution from existing motorcycles and cars using illegally modified exhaust pipes designed to emit noise far above legal limits
- Concerned about the building becoming a secret police station
- Concerned about the violent assault of protesters at the Manchester Chinese Consulate
- Concerned about the actions of the Chinese government in relation to other countries and human rights record
- All phone calls and fibre optic cables will be listened to as the site is adjacent to a BT telephone exchange
- Will impact on property values in the area
- Query whether the site keep a reference in its postal address to it once being the site of the Royal Mint, or if that connection will be extinguished, and the site simply known by the post office and on maps as the People's Republic Chinese Embassy, should consent be granted

5. CONSULTATION RESPONSES

5.1 Below is a summary of the consultation responses received from both internal and external consultees from initial consultation stage, including various re-consultations.

5.2 It should be noted that whilst the below provides a summary of the responses received, officers have had regard to the full submissions when assessing the proposed development.

Internal responses

LBTH Arboriculture:

5.3 Content with the removal of 9 trees and with 28 trees proposed to be planted ensuring an uplift of 19 trees. Subject to planning consent, conditions would be secured in regard to; full details of proposed planting, Arboricultural Method Statement, tree protection measures.

LBTH Biodiversity:

- 5.4 Subject to planning consent, conditions would be required to secure a biodiversity mitigation and enhancement plan.

LBTH Community Safety:

- 5.5 The Council's Community Safety Division is responsible for strategic oversight of the crime and disorder agenda in Tower Hamlets, working in partnership with relevant agencies to reduce the impact of crime, disorder, substance misuse and reoffending on the borough and in the community. Several meetings have been requested and held with concerned residents on the perimeter and within the footprint of the site. These meetings involved council and police representatives
- 5.6 London and crowded places can be considered as a target rich environment for terrorists due to the large numbers of people, iconic locations, publicly accessible locations, and because of London's rich diversity, status and importance to the UK and international economy. It can be expected that a major Embassy, such as the new Chinese Embassy, will have very robust protective security arrangements in place. These include hostile vehicle mitigation measures to protect all the people who use public spaces in and around the perimeter from a vehicle as a weapon attack.
- 5.7 Effective physical security is best achieved by multi-layering different measures. Unlike any other Embassy in the UK, however, the land at Royal Mint Court also includes 100 leasehold homes. We are aware that residents of St Mary Grace Court have significant security concerns given their unique position and they have commissioned a specialist risk assessment to assist their members, the London Borough of Tower Hamlets Strategic Planning Committee, the applicant to understand the risks to life and property. The risk assessment recommends a series of measures to mitigate risk to life, property and the local environment.
- 5.8 The Metropolitan Police and Counter Terrorism Security Advisor are best placed to provide expert and specialist advice in this regard. However, we would strongly encourage the residents risk report and its recommendations be carefully considered as part of the application process and the Applicant should work with the residents and the Metropolitan Police in this regard.
- 5.9 The new Chinese Embassy at Royal Mint Court, London EC3N will consolidate most of the subsidiaries into one complex making it the biggest diplomatic base in the UK. The current Embassy in Portland place has a significant number of gatherings and lawful protests throughout the year. Simple internet searches reveal the extent of the protest activity that has taken place at the Chinese Embassy at its current location at Portland Place over the past decade. These gatherings and protests are focussed on a range of international political issues and have the potential of attracting thousands of people and polarising views. Various local community representatives and community organisations have been spoken to about the development of the site and relocation of the Chinese Embassy.
- 5.10 It is difficult to predict with any accuracy the future level of protest based on the current position of the Embassy in central London. It could reasonably be expected given the historic and iconic location for the Embassy and its strategic position that there will be a high level of potential protest, which in turn may impact adversely on surrounding strategic road network, arterial roads, residential neighbours, local business community and public space near the Tower of London and Tower Gardens. The applicant should work with TfL and the Council to formulate a comprehensive package of highway works, focussing on the risk and potential for protests and disruption on the surrounding neighbourhood and its residents.
- 5.11 The location is not a specific crime and Anti-Social Behaviour (ASB) hotspot, albeit there is a significant footfall around the locality due to its iconic location and visitor attractions such as

Tower Bridge and the Tower of London. Whilst there is council owned public space CCTV in the area, it may be advantageous to install additional cameras in certain locations to assist in monitoring and managing any gatherings or protests and any increases in crime in the area. Being able to respond to calls to the Metropolitan Police using video and being able to monitor, transmit images to the Police will help with any public order situation. The potential to increase visibility of the building perimeter and the footprint with local authority owned public space CCTV should be considered as part of this application.

- 5.12 The Council's Strategic Plan prioritises the outcome People feel they are part of a cohesive and vibrant community (Outcome 8). The Council's Plan for a more Cohesive Community (2020 - 2025) delivers on this ambition. In order, to achieve a more cohesive society, this plan sets out an ambition to continue to foster, opportunities for collaborative place shaping. Given the rich and celebrated heritage of this site, the applicant should work with the Council to demonstrate how the development will actively contribute to social cohesion in the Borough and the Council's strategic priorities in this regard.

Planning response: These matters are covered in 'Public Safety and Security' in section 7 of this report.

LBTH Energy Efficiency Unit / Sustainability Officer:

- 5.13 Subject to planning consent, S106 legal agreement to secure; carbon offsetting contribution.
- 5.14 Subject to planning consent, conditions required to secure; as-built calculations to demonstrate delivery of anticipated carbon savings and monitoring requirements of the GLA 'Be Seen' policy; BREEAM excellent for all commercial units >500m² at the latest BREEAM methodology relevant to that phase.

LBTH Environmental Health (Air Quality):

- 5.15 Subject to planning consent, conditions required to secure; dust management plan; boiler and CHP air quality standards compliance; non-residential kitchen extraction details; NRMM details; PM10 monitoring.

LBTH Environmental Health (Contaminated Land):

- 5.16 A pre-commencement condition should be secured in order to identify the extent of the contamination and the measures to be taken to avoid risk when the site is developed

LBTH Environmental Health (Noise & Vibration):

- 5.17 Subject to planning consent, conditions required to secure; noise insulation verification report for new residential units; noise from plant compliance; restrictions on demolition and construction activity.

LBTH Environmental Health (Smell/Pollution):

- 5.18 No response received.

LBTH Growth and Economic Development:

- 5.19 Subject to planning consent, S106 legal agreement required to secure provision of financial contributions towards construction phase and end use phase job opportunities, and non-financial obligations towards construction phase apprenticeships, local job opportunities and local procurement.

LBTH Sustainable Urban Drainage Systems (SUDS):

5.20 Subject to planning consent, conditions would be required to secure a detailed surface water drainage scheme.

LBTH Transportation and Highways:

5.21 LBTH Highways have reviewed the application submission alongside TfL and have helped to secure the following conditions and legal obligations, subject to planning consent:

- Car Park Management Plan
- Cycle Parking Management Plan
- Travel Plan
- Deliveries and Servicing Management Plan
- Construction Management Plan
- S278 legal agreement (including Cartwright Street and Royal Mint Street)

LBTH Waste Policy and Development

5.22 Subject to planning consent, condition required to secure a site-wide waste management plan.

External consultees

City of London Corporation:

5.23 No response received.

Council of British Archaeology:

5.24 No response received.

Georgian Group:

5.25 Does not wish to comment on the application.

Historic Buildings and Places (Ancient Monuments Society):

5.26 We have no objection to the principle of the proposal, particularly the refurbishment of the grade II* listed Johnson Smirk Building and the redevelopment of the 1980s office buildings. Regarding the physical impact of the proposed redevelopment works on the remains of the abbey, this is beyond our remit and we refer you to the extensive comments and concerns provided by the Greater London Archaeological Advisory Service. However, we are concerned about the long term public access and management of the ruins once the Embassy is established. The London Plan specifies that 'Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection'. It does not appear that existing proposal would achieve these goals for this important World Heritage Site.

5.23 The application proposes a small heritage interpretation centre (HIC) under the proposed Cultural Exchange Building, though the management, detail of the exhibits, and wider public benefits of the HIC have not been made clear in the application. Only the Abbey Kitchen ruins would be publicly visible in the proposed scheme, in addition to a small area for the display of artifacts associated with the site. The surviving parts of the Infirmary, Dormitory, Reredorter, Chapter House and Cloister would be inaccessible and the application does not seek to improve or expand public access or our understanding of the history of the wider site. We also note and agree with the interim feedback provided by Tower Hamlets to the applicant that the proposed

HIC in its current form does not represent a satisfactory public benefit, particularly in light of the extensive museum that was proposed in the past that extended over and around the majority of the excavated ruins.

- 5.24 Even with this small HIC facility, given the security concerns surrounding the existing Chinese Embassy and consulate facilities, long term access is a concern. The HIC is located within and under one of the key Embassy buildings and shares a single entry point with the formal public entrance to the Cultural Exchange Building. Access is likely to be severely restricted, particularly during events. It's unclear what power your Authority would have to enforce public access to the HIC. Given the importance of this site to London and the Tower of London World Heritage Site, future access, education and management of the historic remains on this site should not be compromised by the new use.

Planning response: These matters are covered in 'Heritage and Design' in section 7 of this report.

Historic England:

- 5.25 In our view, the proposals would result in a much better backdrop building compared to the existing condition and would therefore enhance the setting of the Johnson Smirke building and this part of Tower Conservation Area. Historic England supports the application on heritage grounds.

Historic England (Greater London Archaeological Advisory Service (GLAAS):

- 5.26 Further to our archaeological advice letter to you of 9th August 2021 and our subsequent advice to you by email on the January 2022 Framework Archaeological Outreach and Interpretation Strategy, we have now received the updated Archaeological and Heritage Outreach & Interpretation Strategy, dated August 2022.
- 5.27 We welcome the improved offer of lavatory access and the undertakings for a revolving programme of exhibitions planned for the Cultural Exchange Building. This will go some way to helping improve the visitor experience and tell the story of this fascinating site.
- 5.28 However, we still question the practical operation of a 75 sq. m Heritage Centre that seeks to display remains and also interpret the site's other history and display exhibitions on minting money. There are valid concerns to be raised over the operation of the site in a way that its rich past deserves.
- 5.29 It is a shame that the plans still lack clear and compelling ideas and ambition around presentation and interpretation, and that GLAAS' encouragement around audience development and an offer tailored to those audiences has not been acknowledged in a more substantive way. The non-binding nature of any offsite display offer is noted, but we are not clear that our encouragement for liaison and dialogue with experienced bodies and individuals, as well as nearby stakeholders to achieve wider benefits, has been taken up. The omission from the project team of detailed contributions from a specialist in museum and public heritage interpretation matters appears to continue.
- 5.30 The offered £200k towards an Urban Design Study is a positive opportunity. There remains little detail in the material so far on what that would provide and therefore how it is related to the scale and kind of development, so we therefore encourage seeking further information in this regard.
- 5.31 No further undertakings are provided around GLAAS' suggested steering committee and there is no further detail provided on the proposed innovative use of technology, or on the issue of annual access to the ruins.

- 5.32 In view of the very moderate changes from the earlier proposals, our advice to you of August 2021 (attached) is still relevant. We acknowledge that the current proposals do provide positive heritage benefits but consider that they could be improved.
- 5.33 In taking its decision, the LPA should weigh the less than substantial harm to nationally important archaeology against the public benefits of the scheme (NPPF 202). Referring back to our advice letter, the heritage benefits currently proposed include maintaining an appropriate use of the listed buildings, securing physical preservation of, and limited public access to, the Abbey ruins and providing some interpretation of the site's rich and complex history. These would all be meaningful benefits.
- 5.34 Our view is that the site's significance is such that further benefit could be achieved through a higher level of access and interpretation than is allowed for in the current proposals, but we acknowledge that the special requirements of an embassy limit the degree to which that potential can be realised.

Planning response: These matters are covered in 'Heritage and Design' in section 7 of this report.

Historic Royal Palaces:

- 5.16 The development site is part of the immediate setting and buffer zone of the Tower of London World Heritage Site. The London Plan specifies that 'Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection'.

Visual Impact

- 5.17 In terms of the visual impact on the setting of the monument, we agree with Historic England that the proposals provide a better backdrop to the Johnson Smirke Grade II* listed building and its Grade II Listed entrance lodges, previously buildings of the Royal Mint, than the existing situation and indeed the previously consented scheme. We do not find that there is significant or harmful impact on any of the key views from the Tower WHS which are captured in the applicants' Heritage, Townscape and Visual Assessment.

Archaeology, Outreach and Interpretation

- 5.18 The development site contains below ground evidence of multiple phases of use and historic development that are of national importance and we note and support the concerns that Historic England has raised about the Environmental Statement that has been included with the submission. We warmly welcome the inclusion of a Heritage Interpretation Centre as part of the development proposals and like Historic England and the Planning Authority, would like to see a detailed Outreach and Interpretation strategy that demonstrates that the proposals will adequately accommodate, make accessible and interpret the extensive and rich histories of the site.
- 5.19 A key Aim of our WHS Management Plan is 'To preserve and enhance the local and wider setting' and a key action within that to create more joined-up visitor journeys through the City is to 'Work with local museums and heritage organisations to re-establish and interpret lost historic links between the Tower, the Thames and the Liberties...' As a key stakeholder in the history of the Royal Mint, Historic Royal Palaces would especially like to engage with the applicants in sharing our curatorial research and in interpreting and presenting the stories of the Royal Mint and creating links across our adjacent sites.

Public Realm

- 5.20 Within the Local Setting Study that supports our WHS Management Plan the importance of the links between the site of the Royal Mint and the Tower are encapsulated in the Aims and objectives relating to the key view between the two sites. We aim to ensure that the Tower sits in a high-quality setting. This can be supported with the rationalisation of street clutter (street furniture signage and lighting) and improved layouts, surface materials and street furniture.
- 5.21 We welcome the improvements to the public realm in the zone labelled the 'Front Garden' in the applicants' Landscaping Scheme document by Gillespies. Also, along parts of East Smithfield Street, designated as Route 11 in our Local Setting Study that are labelled Exchange Square, though the design could do more to delight the street users and provide greater space and flow along the jagged boundary edge of this approach route.
- 5.22 Mansell Street is designated as Route 10 in our Local Setting Study and the development proposals do nothing here to address the long stretch of inactive frontages and surface finishes as you approach the Tower (either on Mansell Street or the intersecting Royal Mint Street) and to connect to the unfolding panorama of the Tower at the southern end of the street as it joins the 'Front Garden'. A more holistic and joined up approach to the treatment of the boundary and edges of the entire site is needed to provide wider public benefit and recognise the importance of the local setting to the Outstanding Universal value of the World Heritage Site.

Public Safety and Security

- 5.23 We have concerns around the potential of the Embassy attracting large numbers of people (i.e. protestors) to areas already designated as 'crowded spaces' and whether the designs currently allow sufficient space and measures for public safety and security. We include the area of Tower Gardens in this concern, where there is a potential for protestors to congregate. We would ask that our comments and concerns are taken into account in consideration of these planning applications.

Planning response: These matters are covered in 'Heritage and Design' in section 7 of this report.

Greater London Authority (GLA):

Land use principle

- 5.25 The proposed sui generis embassy use is supported in land use terms.

Urban design and inclusive access

- 5.26 The proposed development does not comply with London Plan Policies D9A and D9B as the site has not been specifically identified as suitable for a tall building and a height specified. The applicant provided material that with the exception of car parking, demonstrates compliance with London Plan Policy D9C.

Heritage

- 5.27 The proposal would not cause harm to above ground heritage assets or LVMF views. The applicant should continue to work with Historic England (GLASS) and Tower Hamlets officers to address archaeological concerns.

Climate change

- 5.28 No objection subject to s106 legal agreement to secure Be Seen monitoring commitment, maximisation of on-site savings from renewables, carbon offsetting payment, future proofing for district heating networks. Proposed measures related to air quality should be secured by condition.

Transport

- 5.29 Car parking levels do not accord with the London Plan and the applicant should address the other transport concerns set out in this report, especially in relation to the detailed highway arrangements, prior to any Stage 2 referral.

Planning response: TfL (the strategic highways authority responsible) have confirmed that they are satisfied with the level of car parking proposed and highways implications in light of conditions and s106 obligations which would be secured, subject to planning approval. In regard to tall buildings policies, these are covered in 'Heritage and Design' in section 7 of this report.

London and Middlesex Archaeology Society (LAMAS):

- 5.30 The London and Middlesex Archaeological Society, founded in 1855, is primarily concerned to ensure that London's built and buried historic environment is adequately protected when threatened by development proposals. It is on this basis that we wish to comment on the proposals for the redevelopment of Royal Mint Court which are currently before your committee.
- 5.31 The development is clearly within a very sensitive area of high historic interest now dominated by the World Heritage Site of the Tower of London. Excavations conducted on the Royal Mint site in the 1980s by the Museum of London recovered extensive and well-preserved traces belonging to the Abbey Church and other buildings of the Medieval foundation of St Mary Graces, along with the remains of a cemetery linked with the Black Death 1348-9.
- 5.32 We have seen the submissions prepared by Historic England and the Ancient Monuments Society. We agree that the development proposal currently before your Committee needs to take full account of the heritage assets present on the site. These are likely to include findings within the hitherto unexcavated portions of the site impacted by the proposals, which could reveal more of the Black Death cemetery, as well as other parts of St Mary Graces.
- 5.33 In line with earlier proposals, it will be important to agree that the archaeological discoveries from Royal Mint Court, whether structural or portable, should be exhibited on-site, for the benefit of the public. Further to an receiving an updated Archaeological and Heritage Outreach & Interpretation Strategy (AOIS) with a series of amended proposals relating to the heritage aspects of the site and their eventual display to the public, LAMAS would support. LAMAS would also agree to being part of a steering group for the AOIS.

Metropolitan Police:

- 5.34 The Metropolitan Police Service has a range of long established specialist units, policing plans and procedures to manage security and public safety in London, including for embassies and consular buildings. Public safety and security in and around embassy and consular buildings is managed in partnership with a variety of stakeholders including consular staff, local and specialist policing units, Transport for London and local authorities. This includes, but is not limited to: the management of protest activity, public order, events etc.
- 5.35 As a consultee within this planning process, the Metropolitan Police Service has worked with these key internal and external stakeholders to identify and mitigate any likely risks to the proposed application and surrounding area. In terms of this application, the opportunities to design out identified risks during the planning stages have been explored and advice provided to the planning authority. Where these risks can be mitigated, proportionate advice and recommendations have been provided to stakeholders as necessary. Metropolitan Police raise no objection to the application.
- 5.36 Although the development would not fall under a Secured by Design site, a number of security recommendations have been suggested, such as: rationalising proposed boundary treatment around the site, raising tree canopy height to the frontage, security improvements to the

neighbouring St Mary Grace's Court and allowing space within the site for storage of temporary protest fencing.

Planning response: These suggestions have been incorporated and/ or would be secured by subject to planning approval.

Rescue: The British Archaeological Trust:

5.37 No response received.

SAVE Britain's Heritage:

5.38 No response received.

Society for the Protection of Ancient Buildings:

5.39 No response received.

Thames Water:

5.40 Subject to planning approval, conditions are required to secure; water network upgrades or development and infrastructure phasing plan; no development within 5m of the water main without further information, piling method statement.

The Archaeology Forum (TAF):

5.41 No response received.

Tower Hamlets Homes:

5.42 The current Embassy in Portland Place has a significant number of gatherings and lawful protests throughout the year. In line with this experience, it is reasonable to expect that the relocated embassy in its new location will continue to see a sizeable number of gatherings and protests in response to international political events. We have already seen the Royal Mint Green being used as a point of congregation for protests held by Extinction Rebellion and expect that the space will become a focal point for protests against the Chinese embassy in the future. This would undoubtedly have an adverse effect on the lives of residents on the estate.

5.43 The costs for maintenance of the estate and the associated green space are currently re-chargeable to THH residents. An increase in footfall in the area and use of the green space is likely to see an increase in the costs of caretaking and maintenance which would need to be passed onto residents. Whilst we acknowledge that some consideration has been given to enhance the green space as a way of designing out some of the problems that we anticipate, any changes would need to consider the longer-term impact and practicalities around maintenance. The proposed changes would also only address concerns associated with the Royal Mint Green and would not mitigate against any increased caretaking and maintenance requirements that may arise across the estate as a direct result of the re-location of the embassy.

5.44 The estate currently has a high level of antisocial behaviour and drug related incidents which is responded to jointly by the Council and Tower Hamlets Homes. In addition to the considerable resources deployed by the Police and the Local Authority, Tower Hamlets Homes regularly deploys its own Police resources and Parkguard patrols to respond to such concerns. An increase in footfall in the area is likely to contribute to an increase in antisocial behaviour and create additional pressures on resources.

5.45 We note that in response to this planning application, the Council's Community Safety division has recommended the installation of additional CCTV cameras to assist in monitoring and managing any gatherings or protests and any increases in crime in the area. THH would strongly support such a measure.

5.46 The current threat level to the UK is deemed as substantial. Diplomatic missions are often the target of terrorism. Given its proximity to the estate, we would have concerns around the potential for there to be an impact on the safety and wellbeing of residents on the estate. Aside from measures such as the installation of additional CCTV, we would request that further consideration is given to mitigating the impact of any potential terrorist activity for residents on the estate.

Planning response: These matters are covered in 'Public Safety and Security' in section 7 of this report. Existing antisocial behaviour on the estate is not a material planning consideration for the proposed development and it is not considered that the embassy would result in increased antisocial behaviour to the estate.

Tower Hill Improvement Trust

5.47 No response received.

Transport for London (TfL)

5.48 Subject to planning approval, conditions and legal obligations are required to secure:

- An obligation to enter into a s278 agreement with TfL for the works on TLRN. This should include the identified Active Travel Zone (ATZ) works (£60K) as it's not practical in delivery or administration terms for TfL to receive a one off £60K.
- The £200K for an urban design study is welcomed, TfL requests that the scope of the study is consulted on with TfL.
- TfL request that consultation rights i.e. 'to be approved by the Council in consultation with TfL' on the following docs, as these elements directly impact TfL's network:
 - Construction Management Plan
 - Delivery and Servicing Plan
 - Car Parking Management Plan
 - Travel Plan
- TfL would also like an Events Management Plan to be secured. This will need to cover the full range of events from the largest receptions to more day to day lectures and exhibitions. Critically for TfL, the event management plan should also include the plans and arrangements for a protest event, the steps that the applicant will take to mitigate these activities, minimise impact on TfL's network (and LBTHs) and how engagement with TfL and other stakeholders would take place.
- The applicant has offered the inclusion of an obligation requiring the Embassy to liaise with TfL and other relevant stakeholders (e.g. the Metropolitan Police) on an occasional basis (e.g. annually) on matters relating to protests, and monitor the various commitments made by the Embassy in the security note that was previously issued (paragraphs 16 to 22). This offer is welcomed and TfL requests that it is included in the HoTs and the obligation allows for as many meetings as necessary, but that they take place a minimum of once a year, but more often at the request of any stakeholder in the group (to be identified).

Planning response: Following agreement by the applicant to the specified conditions and s106 legal obligations, TfL have confirmed that they have no objections to the application.

Twentieth Century Society

5.49 The Twentieth Century Society objected to the previous application for the 'part demolition, alterations and extensions to Murray and Dexter House' and several of our points made in our letter from the 24th March 2016 are relevant here. The proposed alterations are substantial and will, in our opinion, result in the loss of unique 20th-century buildings which contribute to the architectural interest of the Tower of London Conservation Area. The Heritage Statement claims that the buildings "have no architectural merit" and are the product of "an impoverished period of architectural design" which are bold statements made without any evidence or analysis to support them. The Society disagrees with the applicant and considers Murray and Dexter House to be sophisticated, unique buildings designed by two leading 20th-century architectural practices.

5.50 We believe the cladding, mechanical and electrical services could be sensitively upgraded and need not be entirely removed. In line with local policy which aims to "preserve or [...] enhance the borough's designated and non-designated heritage assets in a manner appropriate to their significance", we urge the local authority to refuse the current application and encourage the applicants to consider revising the proposals to retain the buildings' existing external fabric.

Planning response: These issues are covered in 'Heritage and Design' in section 7 of this report.

Victorian Society

5.51 No response received.

6. RELEVANT PLANNING POLICIES AND DOCUMENTS

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

6.2 The Development Plan is influenced at national government level by:

- National Planning Policy Framework (2021)
- Planning Practice Guidance (2021)
- National Design Guide (2019)

6.3 The Development Plan comprises:

- London Plan (2021)
- Tower Hamlets Local Plan 2031 (2020)

6.4 The key Development Plan policies relevant to the proposal are:

6.5 Growth (spatial strategy, healthy development)

- London Plan policies: GG1, GG2, GG3, GG4, GG5, GG6, SD10
- Local Plan policies: S.SG1, S.SG2, D.SG3

Land Use (town centre, employment)

- London Plan policies: SD4, SD5, SD6, SD7, SD8, E1, E2, E3, E4, E11.
- Local Plan policies: S.TC1, DS.H1, S.EMP1, D.EMP2, D.CF2

Design and Heritage (layout, townscape, massing, height, appearance, materials, heritage)

- London Plan policies: D1, D2, D3, D4, D5, D8, D9, D10, D11, HC1, HC3, HC4
- Local Plan policies: S.DH1, D.DH2, S.DH3, D.DH4, S.DH5, D.DH6, D.DH7, D.DH9

Amenity (privacy, outlook, daylight and sunlight, noise, construction impacts, fire safety)

- London Plan policies: D3, D9, D12, D14
- Local Plan policies: S.SG4, D.DH8

Transport (sustainable transport, highway safety, car and cycle parking, servicing)

- London Plan policies: T1, T2, T3, T4, T5, T6, T7, T9
- Local Plan policies: S.TR1, D.TR2, D.TR3, D.TR4

Developer Contributions

- London Plan policies: DF1
- Local Plan policies: D.SG5

Environment (air quality, biodiversity, contaminated land, flooding and drainage, energy efficiency, noise, waste, health)

- London Plan policies: G1, G4, G5, G6, SI1, SI2, S13, SI7, SI8, SI12, SI13.
- Local Plan policies: S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.ES10, S.MW1, D. OWS3, D.MW3 D.SG3

Other policies and guidance

6.6 Other policy and guidance documents relevant to the proposal are listed below. Draft documents currently carry limited weight in the decision-making process.

Greater London Authority

- *Draft* Characterisation and Growth Strategy (2022)
- Circular Economy Statements (2022)
- Energy Assessment Guidance (2022)
- *Draft* Fire Safety (2022)
- *Draft* Optimising Site Capacity: A Design-led Approach (2022)
- Whole Life-cycle Carbon Assessments (2022)
- *Draft* Air Quality Neutral (2021)
- *Draft* Air Quality Positive (2021)
- Be Seen Energy Monitoring Guidance (2021)
- Public London Charter (2021)
- *Draft* Sustainable Transport, Walking and Cycling (2021)
- *Draft* Urban Greening Factor (2021)
- City Fringe Opportunity Area Planning Framework (2015)
- Social Infrastructure (2015)
- Accessible London: Achieving an Inclusive Environment (2014)
- Character and Context (2014)
- The Control of Dust and Emissions During Construction and Demolition (2014)
- All London Green Grid (2012)
- Planning for Equality and Diversity in London (2007)
- London World Heritage Sites Guidance on Settings (2012)

Tower Hamlets

- *Draft* Tall Buildings (2021)

- Reuse, Recycling and Waste (2021)
- Planning Obligations (2020)
- Development Viability (2017)

Other

- Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2022)
- Tower of London World Heritage Site Management Plan (2016)
- Tower of London World Heritage Site Local Setting Study (2010)

7. PLANNING ASSESSMENT

7.1 The key issues raised by the proposed development are:

- i. Land Use
- ii. Heritage and Design
- iii. Public Safety and Security
- iv. Neighbouring Amenity
- v. Transport and Highways
- vi. Environment
- vii. Infrastructure
- viii. Human Rights and Equalities

LAND USE

Existing Uses

7.1 In regard to the most recent comprehensive use of the site, a number of planning applications and listed building consent applications were submitted in 1986 and it is understood that these were built out but not fully implemented in terms of the mix of uses. The applications in 1986 permitted uses including offices, museums, sports centre, residential accommodation, restaurant, retail facilities, community centre, public house, car parking including a new pedestrian subway under East Smithfield. The residential accommodation built out is known as St Mary Grace's Court, located to the east of the current application site.

7.2 Since the application site was built out following the 1986 applications, it has predominantly been in commercial use by financial institutions, comprising 62,643sqm GEA of overall floorspace (consisting of 59,940sqm office space (use class E(g)) and 2,398sqm of, formerly flexible office/leisure (use class E(g)/ F2) and 305sqm drinking establishment (Sui Generis use). The site has been vacant since 2013.

Principle of Development

7.3 The application proposes an embassy along with ancillary uses as shown in Figure 5. The embassy is the diplomatic mission for the country it represents and is the base of the ambassador, including hosting functions as well as being responsible for maintaining the political, cultural and social relationship with the host country. The embassy has a visa processing service and is responsible for providing assistance to its national citizens in the host country. It is proposed that the visa services which take place at the existing embassy in Portland Place, City of Westminster, would be transferred to the application site, namely

passports for Chinese citizens, visas for holders of business passports and diplomatic passports, and legalisation.

- 7.4 The site is located in a Secondary Preferred Office Location (POL) within the London 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.

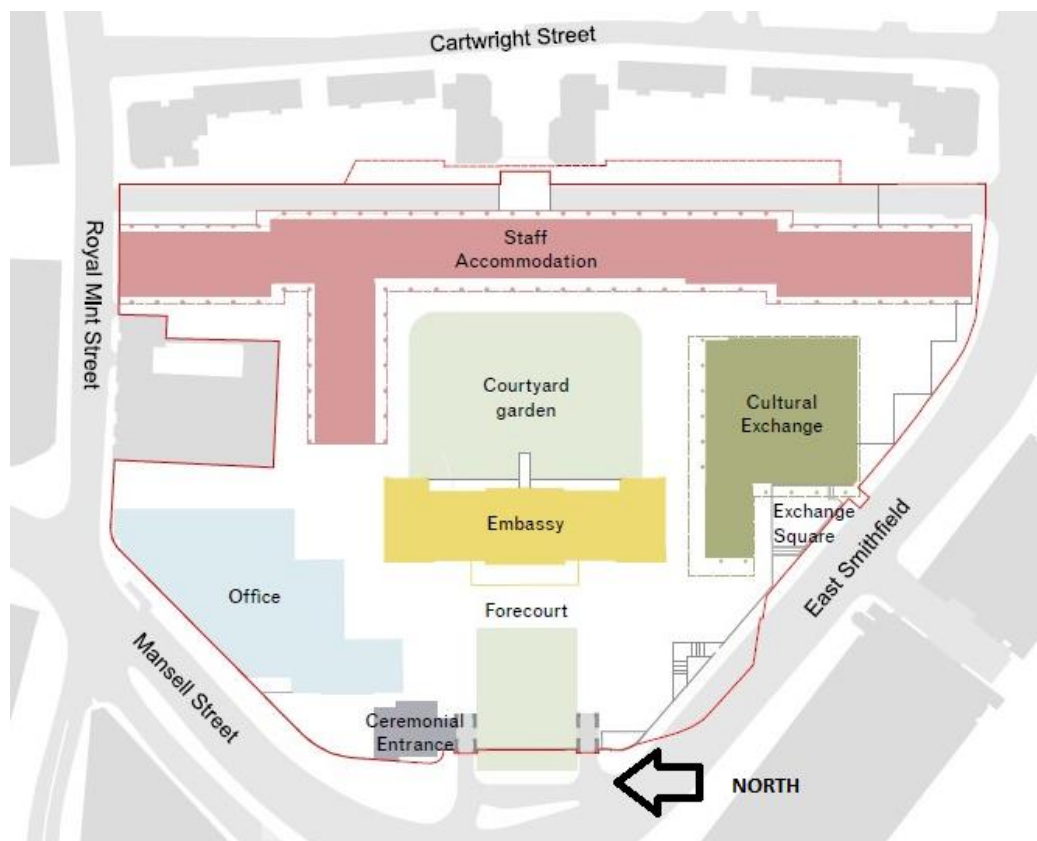


Figure 5: Proposed embassy layout

- 7.5 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.
- 7.6 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) is regarded as acceptable in principle, subject to compliance with all other policy considerations.
- 7.7 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 52,332sqm gross internal area (GIA) with staff accommodation accounting for approximately 30,791sqm GEA. This would equate to 59% of the floorspace. These residential uses on-site would be ancillary to and support the main function of site as an embassy. Subject to planning approval, the use of the residential accommodation only for staff of the embassy would need to be secured by condition.

Ancillary accommodation

- 7.8 Overall, there would be 196 accommodation units for embassy staff and 29 short-stay units located in Embassy House, at the eastern extent of the site. Policy D.H4 references specialist housing and specifies that “*staff accommodation ancillary to a relevant use*” falls under this category, therefore the embassy accommodation could fall under the scope of this policy. In order to comply with the policy requirements, new specialist and supported housing is supported where it:
- (a) meets an identified need,
 - (b) is of high quality and meets relevant best practice guidance for this form of accommodation,
 - (c) is located in close proximity to public transport and local shops and service, and
 - (d) includes provision of affordable units, where appropriate.
- 7.9 The proposed specialist accommodation (indicative floor plans shown in Figure 6) would meet an identified need along with the co-located embassy. In terms of the quality of accommodation, comparing the unit sizes of the proposed ancillary staff accommodation to conventional residential housing, for 1-bed units, these would be between 43-48sqm compared to 50sqm conventional unit standards. For smaller 2-bed units, these would be 57-63sqm compared to 61sqm for 2b3p conventional unit standards. For larger 2-bed units, these would be 70-87sqm compared to 70sqm for 2b4p conventional unit standards. For 3-bed units, these would be 93-97sqm compared to 74sqm for 3b4p and 86sqm for 3b5p conventional unit standards. For 3-bed +, these would be 107sqm compared to 102sqm for 3b6p conventional unit standards.
- 7.10 Floor to ceiling heights would be generous (over 4.1m) compared to conventional unit standards (2.5m). In light of the above, it can be seen the staff accommodation units would broadly be in line with internal space standards for conventional housing although there may be some shortfalls. Ancillary staff accommodation is not required to comply with nationally described space standards for conventional housing units, although the broad compliance is a good indication of satisfactory design quality.
- 7.11 It is understood that the majority of proposed accommodation units would be single aspect although none would be single aspect and north-facing. 3-bed units would benefit from dual aspect outlook. Each unit would benefit from private amenity space in the form of its own generous balcony (21sqm) and communal amenity and play space would be available at roof level (400sqm) of Embassy House and within the landscaped gardens of the internal courtyard (1,890sqm) at ground level. A learning resource centre would be located at ground level within the building, to aid the educational needs of occupants.

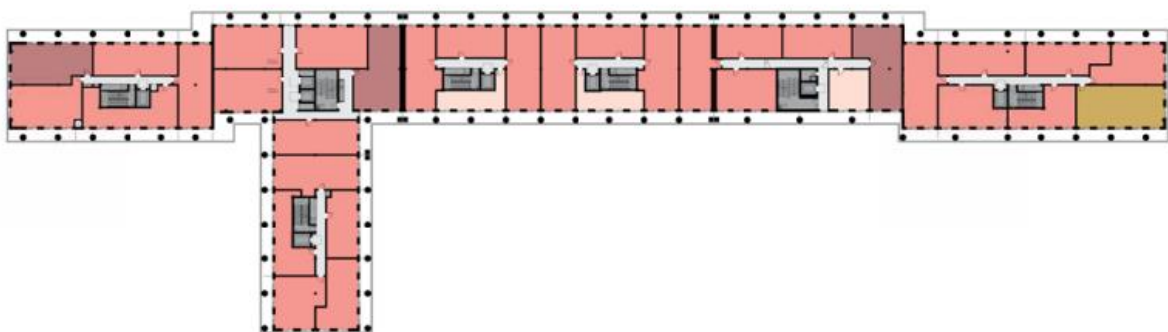


Figure 6: Typical upper floor layout of accommodation within Embassy House

- 7.12 Policy D.DH8 requires the protection of the amenity of future residents and occupants by ensuring adequate levels of daylight and sunlight for new residential developments. Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook ‘Site Layout Planning for Daylight and Sunlight.’

- 7.13 The applicant has provided an Internal Daylight and Sunlight Adequacy Report (IDSAR), undertaken by Delva Patman Redler. This has been reviewed by an independent consultant, Building Research Establishment (BRE) on behalf of the Council. The IDSAR provides results for all of the proposed accommodation rooms to be created within the proposed development. Results have been provided for ADF daylight, NSL daylight, RDC daylight and APSH sunlight. Further information on daylight and sunlight technical terms can be found in the 'Amenity' section.
- 7.14 In regard to daylight provision to internal accommodation rooms, the results show that 542 (86%) of 633 rooms would meet ADF guidance targets. All 633 rooms would satisfy the RDC guidance targets. 509 (80%) of 633 rooms would meet NSL guidance targets. Therefore, the majority of rooms/ windows tested would pass the daylight guidance standards. Many of the rooms which would fail ADF tests would experience very low levels of daylight generally. These would either be on lower ground levels and/ or located in parts of the buildings facing the external telephone exchange building or the 'Cultural Exchange' in close proximity and would also experience limited outlook and higher sense of enclosure.
- 7.15 In regard to sunlight provision to internal accommodation rooms, 51 (23%) of the 225 rooms assessed would meet APSH guidance target levels. The IDSAR has identified a further 90 rooms with APSH levels below the recommended 25% but above 20% indicating relatively marginal failures. The Council's appointed consultant has advised that the failures for sunlight are due to the design of the building with recessed balconies and pillars on either side, which is understandable given that the proposal involves the sustainable reuse of the existing superstructure.
- 7.16 In regard to overshadowing of the internal courtyard amenity space, in order to comply with BRE guidance, an amenity area should receive more than 50% coverage of sun-on-the-ground for 2 hours on 21 March (spring equinox). The internal courtyard would comply with the above guidance and would actually receive more sun-on-the-ground with the proposed development (77%) than in the existing situation (72%).
- 7.17 Overall, and with the benefit of advice provided by the Council's appointed consultant, although there would be some failures against BRE guidance, on balance the scheme would provide a satisfactory level of adherence to daylight and sunlight guidelines for ancillary staff accommodation. The sustainable principles of retrofitting an existing building are strongly supported and must be balanced with the layout requirements of the site. Given the nature of the ancillary accommodation and the fact that with the ownership of the site, the ancillary units would not be sold to the general public as conventional flats, along with the limitations of the proposal in the context of heritage constraints, this element of the scheme is considered to be acceptable in this instance. Conditions will be used to ensure the accommodation is maintained as ancillary to the main embassy function. Taking into consideration the nature of the staff and visitor accommodation, specifically for embassy staff for limited periods of time, the specialist accommodation would be of a sufficient quality, in accordance with policy D.H4.
- 7.18 The specialist housing would be located in a highly accessible location for public transport (PTAL 6b – best) with shops being within the Central Activities Zone and close to Thomas More Neighbourhood Centre (240m to the south-east). The proposal would not include any affordable housing, but it is not considered that affordable units would be appropriate. The specialist housing proposed would be solely for embassy staff and, subject to planning approval and would be conditioned to restrict non-staff from living in non-visitor units and in regard to ancillary short-stay accommodation, stays would be restricted to 90-day stays for visitors to the embassy. For the reasons above, the specialist housing would comply with policy D.H4.

HERITAGE AND DESIGN

- 7.19 Development Plan policies require developments to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm at different spatial scales. Developments should be of an appropriate scale, height, mass, bulk and form in its site and context and provide attractive, safe and accessible places that preserve and where possible enhance the setting of heritage assets.
- 7.20 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.’*
- 7.21 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.
- 7.22 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.

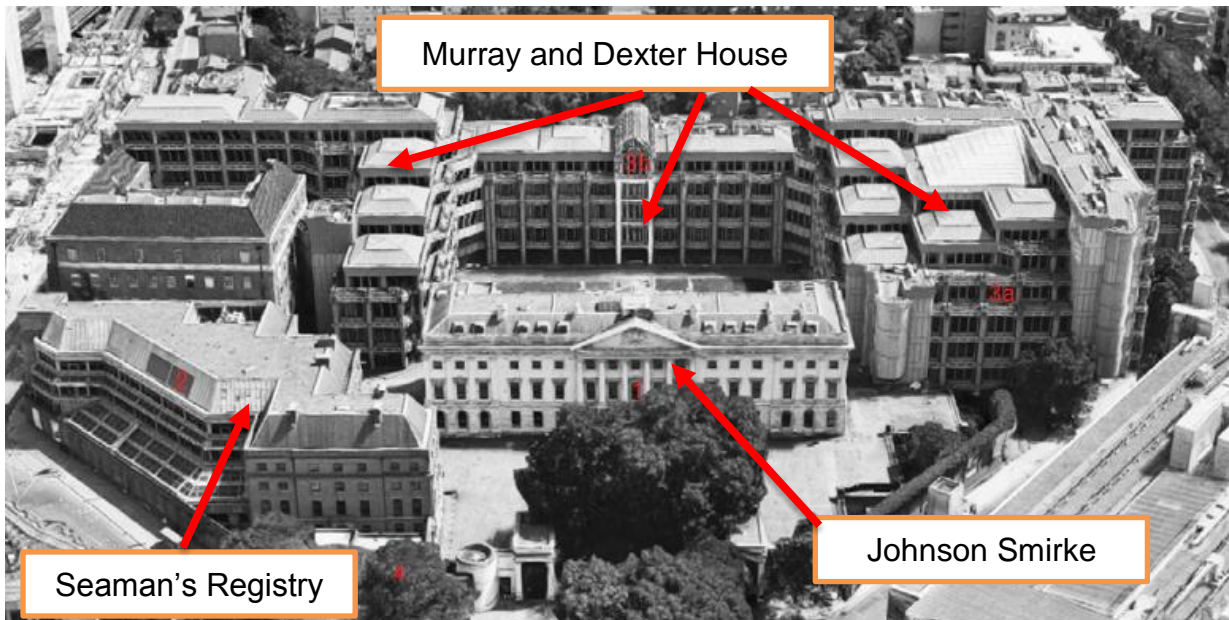


Figure 7: Building locations within application site

Johnson Smirke building

- 7.23 The Johnson Smirke building (location shown in Figure 7) is a Grade II* listed 3-storey (with roof accommodation) building with late Georgian facades and nods to classical architecture, completed in 1811. The building was designed to house the Royal Mint (national coinage production) by James Johnson and Sir Robert Smirke (who also designed the British Museum, completed in 1823). The building’s special architectural and historic interest relates primarily to

the late Georgian façades, the building having been heavily altered in 1986 with the majority of the internal walls, floors, roof and windows stripped out and rebuilt without any great sensitivity to interior heritage sensitivities as modern open plan offices on a new steel and composite steel/ concrete structure contained within the historic elevations. It is understood that the existing windows date from the 1986 works.

- 7.24 The Johnson Smirke building would be generally repaired and refurbished and internally reconfigured (proposals shown in figure 8). The few remaining interior heritage features, including the entrance hall and central staircase would be conserved. Works to the listed Johnson Smirke building are generally considered to be minimal and sensitive. Interventions include an inclusive, accessible plinth to the main entrance, demolition of two dormer windows on the north-east corner of the roof to allow the installation of ventilation louvres below parapet level, along with removal of the flagpole and access gantry / steps on the roof above the main entrance. The Johnson Smirke building would host the embassy's formal diplomatic reception spaces together with a mix of cellular and open plan office accommodation. Banqueting and gatherings would occur at ground floor and ancillary preparations spaces would be at basement level.

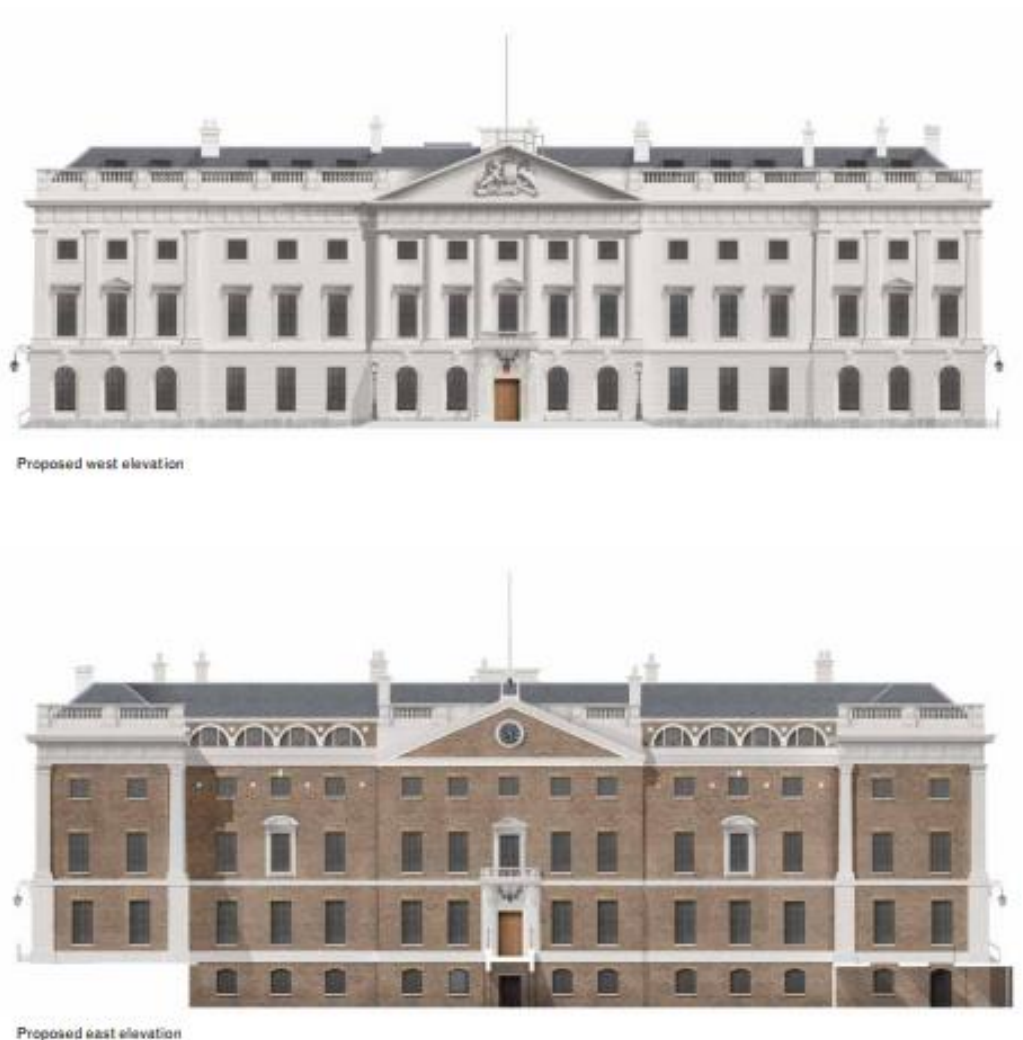


Figure 8: Proposed main facing elevations of Johnson Smirke building

Seaman's Registry building

- 7.25 The Seaman's Registry building (location shown in Figure 7) is a Grade II listed 4-storey (with roof accommodation) building, completed in 1805. It was designed by James Johnson as staff

accommodation for the Royal Mint. The Georgian façade facing the Johnson Smirke building, front courtyard and partly to the site frontage remains, but the building was extensively redeveloped and enlarged in the 1980s works, including the provision of a modernist curtain walling façade to Mansell Street.

- 7.26 Proposals (shown in Figure 9) involve replacement of the 1980s Mansell Street façade with a sensitive brick face to be more in keeping with the building and remainder of the site, as well as extensive internal remodelling. There would be no increase in height, scale or massing. The proposed building would house office space for the embassy. Officers are content with the physical works to the listed buildings generally in relation to preserving or enhancing these assets.



Proposed north west elevation



Proposed north east elevation

Figure 9: Proposed main facing elevations of Seaman's Registry

- 7.27 Works are also proposed to the Grade II listed front entrance lodges with removal of the 1980s substation as shown in Figure 10. The rationalised and simplified front entrance lodges can be seen in Figure 18. No works are proposed to the Grade II listed two cast iron lampstands within the site which would be preserved. Minor works are proposed to the boundary wall around the site, including the removal of a door on Mansell Street, which is considered to be listed by virtue of being within the curtilage of Royal Mint Court.

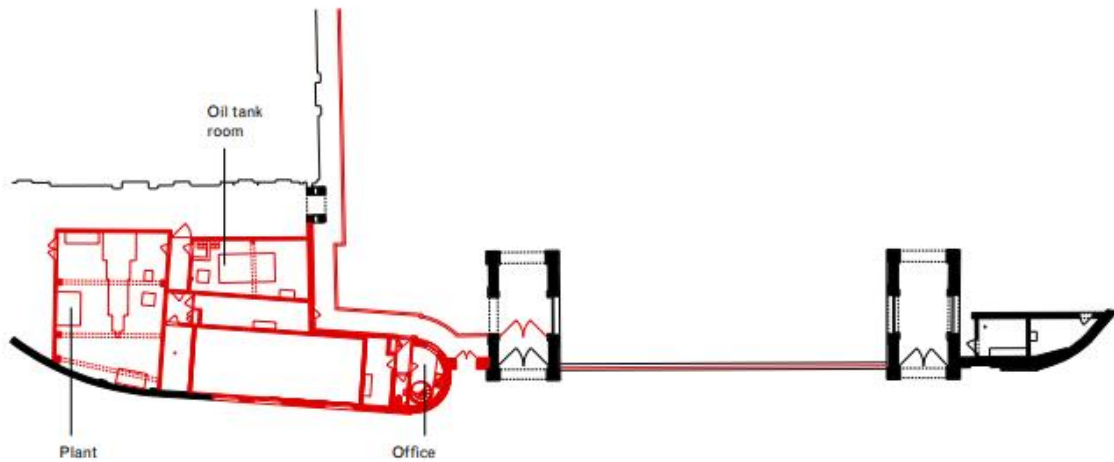


Figure 10: Demolition plan to front entrance lodge

Murray and Dexter House

- 7.28 The existing Murray and Dexter House, designed by Shepherd Robson architects, were constructed following the 1986 planning permissions. The 5-6 storey buildings were designed as a series of stepping, deep plan floor plates suited to large scale open plan offices. The proposals would retain the majority of the original building's internal structure and strip away the external shell to rebuild with a rationalised and simplified building massing to more of a uniform design. The proposed building would house the ancillary accommodation.

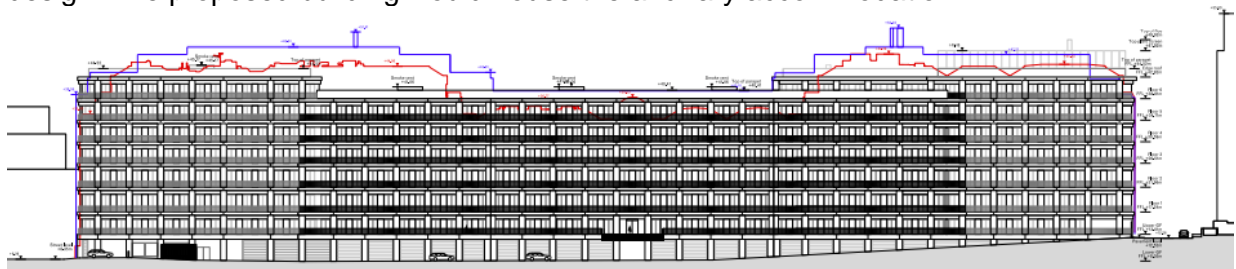


Figure 11: Proposed east elevation massing in black (existing massing in red; previous consent massing in blue)

- 7.29 The proposals would generally reduce the building massing compared to the existing and the previously consented designs (shown in Figure 11), however there would be a slight increase in height (2.6m) and massing on Royal Mint Street. The proposals would also involve a breaking up and separation in massing to create a separate 'Cultural Exchange' building on East Smithfield, which will be discussed more below.
- 7.30 The Twentieth Century Society have stated that Murray and Dexter House are "a fine example of late 1980s office architecture and very much of their time." The Society have stated that they consider Murray and Dexter House to be "non-designated heritage assets which make a positive contribution to the Tower of London Conservation Area," and considers that the proposed alterations would cause "substantial harm" to the non-designated heritage assets.
- 7.31 Officers recognise that the existing Murray and Dexter House are of some limited historic interest as being examples of 1980s office buildings. However officers have concluded that the buildings would not have enough heritage significance to merit the status of non-designated heritage assets. The buildings are not on the Tower Hamlets Local List and are not mentioned in the Tower of London Conservation Area Character Appraisal. Officers are of the view that the proposed building has the potential to enhance not only the setting to the primary listed building on the site (Johnson Smirke) but also the character and appearance of the conservation area. Regardless, even if the buildings were non-designated heritage assets, officers are of the view

that the proposals would represent an improvement on what exists, taking a balanced judgement having regard to the scale of any harm or loss and significance of the buildings, which is in line with the requirements of the NPPF and section 72 of the Planning (Listed Buildings and Conservation Areas) Act. Officers support the sustainable retention of the superstructures of Murray and Dexter House to facilitate their modern repurposing.

Cultural Exchange Building

- 7.32 The proposed part-4, part-7 storey Cultural Exchange building has been designed as the most prominent new intervention for the site, separated from the existing Murray and Dexter House. Figure 12 shows a bold green/ grey ceramic building with Celadon-coloured glazing. The Cultural Exchange building would house public embassy services, including a diplomatic level visa service and offices at lower ground floor. The building would also include a double-height multi-functional hall, reception and banqueting spaces, conference facilities, a double-height lecture theatre, exhibition space, embassy function offices and ancillary spaces. On East Smithfield, there would also be a single storey pavilion building including public facing visa desks, entrance areas and security buffer zones along with a heritage interpretation centre which includes windows onto archaeological ruins.



Figure 12: View of Cultural Exchange Building from East Smithfield

- 7.33 Officers consider that the external appearance of the proposed Cultural Exchange building constitutes a high quality architectural response which would enhance the setting of the listed buildings on-site and the surrounding conservation area. The substantially remodeled building would be further set away from the Grade II listed Johnson Smirke building and there would be a separation and reduction in massing on East Smithfield, which would improve its relationship with the surrounding street scene.

Layout

- 7.34 Within the site, the 4 main buildings (Johnson Smirke Building, Seaman's Registry, Cultural Exchange Building and Embassy House) would be interlinked by a series of pocket gardens and landscaped green spaces (shown in Figure 13). Roof gardens would be available for occupants of ancillary accommodation at Embassy House.

7.35 The site has been designed with a number of character areas in mind. The central courtyard space is envisaged as a lush, Chinese inspired traditional garden with winding paths, sloped areas, stone and water features. The front garden incorporates the improved shared surface space and planting to the site frontage along with the private front lawn. The forecourt set in front of the Johnson Smirke Building within the site is a cobbled ceremonial frontage which also includes some private garden spaces. The southern courtyard around the Cultural Exchange Building and the northern courtyard around the BT Building (not part of the site) include planting and private pocket gardens.



Figure 13: Landscape masterplan

On-Site Heritage Summary

7.36 In regard to the impact on listed buildings and structures within the application site boundary, the proposed development would preserve the setting and significance of listed buildings in accordance with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Building Heights and Impact on Townscape



Figure 14: Existing and proposed building massing

- 7.37 Any impacts on townscape are intrinsically linked with heritage considerations, taking into account the listed buildings in the area along with the conservation area and World Heritage Site context. In regard to the Seaman’s Registry and Johnson Smirke buildings, there would be no significant alterations which would impact on existing building heights. The main variations in building height and massing would take place in Murray and Dexter House alterations for the proposed Embassy House and Cultural Exchange Building. As shown in Figure 14, the proposed height and massing is generally less than the existing and consented developments on-site. On Royal Mint Street, the proposed building height from street level (35.4m) would be greater than as existing (32.8m). There would also be a chimney around this part of the building at 37.4m height, although it would be well setback from building edges.
- 7.38 Supporting text of Local Plan Policy D.DH6 states that buildings of more than 30m are considered to be tall buildings. The existing Murray and Dexter House would constitute tall buildings as they are already over 30m height. The proposal would involve a marginal increase in the maximum building heights of Murray and Dexter House on Royal Mint Street as noted above.
- 7.39 As the proposed development would involve a tall building outside of a Tall Building Zone, it would need to meet the tests as set out in part 3 of policy D.DH6 (shown in Figure 15).

3. Outside these zones, tall building proposals (including those on site allocations) will be supported provided they meet the criteria set out in Part 1 and can demonstrate how they will:
 - a. be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas
 - b. address deficiencies in the provision of strategic infrastructure
 - c. significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area, and
 - d. not undermine the prominence and/or integrity of existing landmark buildings and tall building zones (taking account of the principles set out in Figure 8).

Figure 15: Part 3 of policy D.DH6 (Tall buildings)

- 7.40 The proposal would meet the criteria set out in part 1, such as generally being of a proportionate height and scale, mass and volume, of exceptional architectural quality and sustainable building design, and enhancing the character and distinctiveness of the area without adversely affecting

designated townscapes. In regard to part 3(a), the application site is located in a highly accessible area for public transport (PTAL 6b) within the Mayor of London's City Fringe Opportunity Area.

- 7.41 In regard to part 3(b), in terms of strategic infrastructure, supporting text mentions specific examples such as *"publicly accessible open space, new transport interchanges, river crossings and educational and health facilities serving more than the immediate local area)* to address existing deficiencies and future needs." Embassies fall under strategic functions of the Mayor of London's Central Activities Zone as defined in the London Plan. Embassies would also fall under the definition of social infrastructure, and an embassy of the size proposed would meet a range of needs for subjects of the specified country within London and the wider area, as well as being a centre to better connect with the host country. This part of the policy test is therefore met.
- 7.42 In regard to part 3(c) the tall building height would mark the location of a building of civic significance as an embassy. In regard to part 3(d), the tall building would not undermine the prominence or integrity of existing landmark buildings or Tall Building Zones. Overall, the proposed building heights are considered to be acceptable with only a very marginal increase in height on the existing situation and general improvements in design sensitivity around the site, including reductions in height, massing and bulk. Due to the marginal changes in height and massing along with increased design cohesiveness and the provision of a high quality landmark building in the Cultural Exchange, the impacts on the wider townscape and locality would be acceptable. Further discussion on views is below.
- 7.43 Finally, it should be noted that the council's design and conservation team do not raise concerns regarding the scale, massing and form of the proposals and see the development as an overall improvement on the current situation. Some concern was raised in terms of the heights proposed; however, the design team consider this is balanced against the improvement in architectural quality that is proposed. In this regard, it is clear that the proposals represent an improvement on the current situation and are supported by the design and conservation team.

Impact on Surrounding Heritage Assets and Views

- 7.44 The site is located within Tower of London Conservation Area. It is also within the Immediate Setting of the Tower of London World Heritage Site (as defined within the Tower of London World Heritage Site Management Plan) and it is found within a number of strategic protected views.
- 7.45 The proposal is supported by a Townscape and Visual Impact Assessment (TVIA) (prepared by Montagu Evans) which forms part of the Environmental Statement (Volume 2). This document provides an applicant assessment of the likely significant effects of the proposed development on the local townscape character, including during construction. It has regard to an extensive range of townscape views, the locations of which were agreed with officers. The TVIA also has regard to the impact of the proposed development upon a number of designated and non-designated heritage assets within the surrounding area.
- 7.46 Officers have assessed the visual impacts in line with their statutory duty and have had special regard to the desirability of preserving or enhancing the settings of heritage assets.

World Heritage Site views/ Tower of London Conservation Area

- 7.47 London Plan policy HC2 states that *"development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection."*
- 7.48 The policy further states that *"the surrounding built environment must be carefully managed to ensure that the attributes of the World Heritage Sites that make them of Outstanding Universal*

Value are protected and enhanced, while allowing the surrounding area to change and evolve as it has for centuries.”

- 7.49 The United Nations definition of Outstanding Universal Value is *“cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity. As such, the permanent protection of this heritage is of the highest importance to the international community as a whole.”*
- 7.50 Policy S.DH5 states that *“proposals affecting the wider setting of the Tower of London and Maritime Greenwich or those impinging upon strategic or other significant views to or from these sites (particularly around Tower Hill and Aldgate and within the buffer zone around Island Gardens) will be required to demonstrate how they will conserve and enhance the outstanding universal value of the world heritage sites.”* The policy further states that *“potential opportunities exist to enhance the setting immediately around the Tower of London and reinforce the outstanding universal value of the site.”*

- Strategic Views

- 7.51 In regard to the London View Management Framework, the application site lies within the backdrop to the Protected Vista obtained from Viewing Location 25A1 and 2 at Queen's Walk, in the vicinity of Former City Hall, looking towards the White Tower of the Tower of London and also within the backdrop of LVMF View 11B, from London Bridge looking towards Tower Bridge and Tower of London.
- 7.52 From the protected view (11B) on London Bridge, the proposed development would not be visible. From a zoomed in perspective of the view, the proposed development would still not be visible. Other buildings would be in the background of the Tower of London which is why the proposal would not be seen. From the protected views (25A) on the other side of the river, the proposed development would not be visible, as it would be behind existing built development. In regard to protected views with the Tower of London as the focal point, officers are content that these would be acceptable.

- Tower of London Conservation Area

- 7.53 The proposed development would be viewed from within the Tower of London (only accessible to guests and staff) as can be seen in Figure 16. In regard to the impact on the Grade I listed Tower of London generally, officers are content that this would be acceptable.
- 7.54 From View 14 within the TVIA, the reworked massing of the proposed buildings facing East Smithfield would be seen over buildings adjacent to St Katharine's Dock in conjunction with the Grade II listed warehouses. From closer views around the application site, the proposed development such as Views 16 and 17 within the TVIA, the proposal could be seen as having a beneficial impact on visual amenity. From View 10 on Royal Mint Street (shown in Figure 17), the most prominent increase in height can be seen, although taken within the general context of proposals, this would be acceptable.

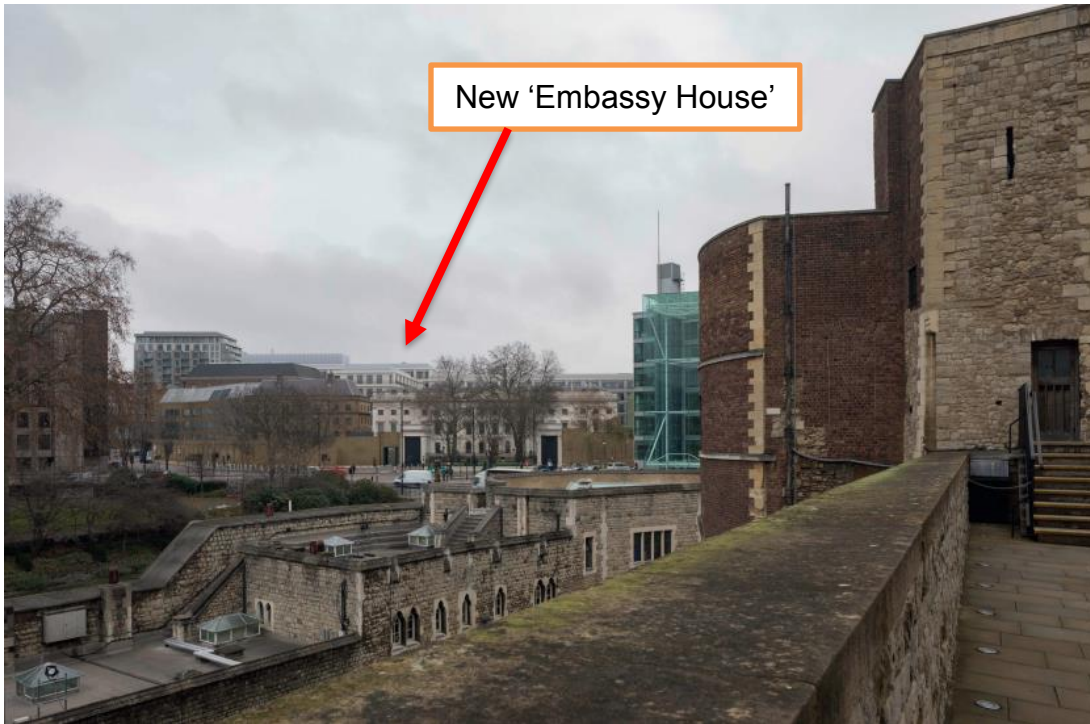


Figure 16: Proposed view from the Inner Curtain Wall of the Tower of London (View 4 in TVIA)

7.55 Overall, the built form of the proposed development is considered to be acceptable and would preserve and enhance the character and appearance of the Tower of London Conservation Area in accordance with section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 whilst preserving the setting and significance of listed buildings in accordance with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Historic England and Historic Royal Palaces are also content with the above conclusions. In regard to the impacts on the Tower of London WHS overall, these will be concluded following assessment of the public realm and archaeology below.



Figure 17: View from Royal Mint Street looking west (View 10 in TVIA) with proposal in wireline

- Public Realm

- 7.56 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.
- 7.57 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.
- 7.58 The Tower of London World Heritage Site Management Plan describes how the local setting of the Tower contributes to the Outstanding Universal Value of the World Heritage Site. The local setting 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. 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 WHS 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.
- 7.59 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.
- 7.60 The lapsed consent 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.



Figure 18: Proposed public realm to site frontage including new front entrance pavilion (to left/ north)

- 7.61 The proposal involves a number of interventions in public realm around the site, mainly revolving around three areas. Figure 18 shows the frontage of the site with rationalised and shared street surfaces proposed along with security bollards and large feature planter.
- 7.62 At East Smithfield (as shown in Figure 19) there would be a number of improvements to the public realm. The existing built massing would be pulled away from the street, whereas it currently overhangs the footway although there would be a new boundary wall (using the same materials as the feature Cultural Exchange Building) introduced in this location whereas there is currently an underused section of grass. This would allow increased footway in some sections however this would follow a jagged wall line allowing pockets of space and trees. Stairs would lead down to the visa entrance and heritage interpretation centre – level access would also be available.
- 7.63 Windows through the heritage interpretation centre would allow views of archaeological ruins. Bollards would extend to the kerbside around this area, providing security and better perception of safety from fast-moving traffic in close proximity. The street level surface within the space would also include some elements of public art. This area is referred to as an approach route to the WHS – Route 11 in the Tower of London WHS Local Setting Study. In relation to this Route, Historic Royal Palaces have stated that *“the design could do more to delight the street users and provide greater space and flow along the jagged boundary edge.”*



Figure 19: Proposed public realm to East Smithfield

- 7.64 A staff entrance is planned (see Figure 20) to the rear of the proposed ancillary accommodation and would be accessed off Cartwright Street via an existing well designed if underutilised hard landscaped pocket public square. Changes to this space would be minimal, mainly involving the addition of security bollards along with general decluttering.
- 7.65 The area around Mansell Street is listed as an approach to the WHS known as Route 10 in the Tower of London WHS Local Setting Study. Historic Royal Palaces have commented that *“the development proposals do nothing here to address the long stretch of inactive frontages and surface finishes as you approach the Tower (either on Mansell Street or the intersecting Royal Mint Street).”*

7.66 Further to the interventions proposed to the three main areas above, generally around the site, there would be a highways improvement works condition, subject to planning approval, to secure a s278 agreement relating to improvements to the public realm, such as paving reparation on Mansell Street, Royal Mint Street and Cartwright Street and subway improvements. On Mansell Street, following comments received from Historic Royal Palaces, artwork is proposed to be installed to bays on the boundary wall in provide some degree of visual interest to help activate this frontage which is currently blank – other signage, installations and displays are also proposed around the site in order to showcase the history of the site and would be secured by condition, subject to planning approval, within an Archaeological and Heritage Outreach & Interpretation Strategy which would secure details of how the site’s rich history and archaeology would be showcased publicly around and within the site.



Figure 20: Proposed staff access gates and facing public realm

7.67 In order to address the issues concerning the public realm located on the edge of the application site and the traffic and street clutter in the Immediate Setting of the WHS, the applicant has agreed a £200,000 financial contribution towards an Urban Realm Study focusing generally on the area to the east of Tower Hill and the west of the application site as shown in Figure 21. This area is heavily trafficked and congested and currently provides a somewhat muddled and car-dominated environment which disrupts the quality of the visual aspect and links between the application site with the WHS. It is the ambition of the Urban Realm Study to masterplan the best solution to improving the pedestrian experience and re-establishing links between Royal Mint Court to the WHS in accordance with the ambitions of the WHS Management Plan and Tower of London Local Setting Study which outlines *“improved road layouts and pedestrian crossings, use of appropriate surface materials, relevant street furniture and lighting and introduction of interpretative material could all play a part in re-linking this area to the Tower and incorporating it within the Liberties, as was historically the case.”*



Figure 21: Indicative area proposed (outlined in white) for Urban Realm Study funding (from Google)

Archaeology

- 7.68 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 including excavation of many Black Death burial grounds prior to construction of the office buildings on-site in the late 1980s and its archaeology is recognised by the Historic England Greater London Archaeology Advisory Service (GLAAS) to be of national significance containing well preserved ruins of a Cistercian Abbey (or the monastery known as Eastminster) from the 1300s as well as other archaeology (not all excavated) including remaining in situ Black Death burial grounds (from the 1300s) and archaeology from the period when the site was the Royal Navy's first victualling (food, drink and supplies) yard (in late 16th, 17th and early 18th century). The site became the Royal Mint in the early 1800s, producing the nation's coinage until minting ceased altogether on the site in 1975.
- 7.69 The archaeological heritage assets on the site are of equivalent importance to a Scheduled Ancient Monument, although the site is not formally designated as such, as confirmed by GLAAS. It is understood that the site would have been scheduled were it not part of the Crown Estate previously. Policy S.DH3 states that archaeological sites of an equivalence to Scheduled Ancient Monuments are to be treated in the same way as Scheduled Ancient Monuments, and that *"any harm to their significance must be justified having regard to the public benefits of the proposal."*
- 7.70 The proposals would involve preservation of existing ruins that are standing and visible within the basement as well as foundation works for new structures around buried ruins which could result in some harm to valued below-ground historic material. This conclusion has been reached by GLAAS based on evaluation of the scheme against that of the lapsed 2017 consent submission material, as well as fieldwork results. GLAAS have assessed the impacts on archaeological heritage assets on the site and have stated that the proposals would result in less than substantial harm to nationally important archaeology. The harm to below-ground

heritage assets must therefore be weighed against public benefits of the scheme in accordance with paragraph 196 of the NPPF.



Figure 22: Indicative images of the Heritage Interpretation Centre

- 7.71 The proposals (shown in Figure 22) involve the provision of new semi-public views of archaeological assets to the public available outside the Cultural Exchange building through large, glazed openings in the Heritage Interpretation Centre. The Heritage Interpretation Centre (HIC) itself would be a 75sqm glazed pavilion attached to the Cultural Exchange building facing an area of outdoor public space. The HIC would provide display space for material relevant to the site's history. Toilet facilities would also be available in the adjacent building. Opening hours would be 10am-4pm, Monday-Saturday with later hours one Wednesday per month. Proposals also involve an online presence.
- 7.72 Additional exhibition space has been secured within the main Cultural Exchange Building for members of the public to access. 360sqm (180sqm at first and at second floor levels) of the exhibition space within the Cultural Exchange Building, which would be available to showcase the history of the site for a continuous period of 8 weeks, 3 times per annum with the same opening hours as the Heritage Interpretation Centre. This would amount to 6 months in total per calendar year. It is understood that exhibitions would remain in place for private visitors to the embassy for the remainder of the year when the space is not open to the general public.
- 7.73 GLAAS have assessed the archaeological proposals and have queried whether the size of the HIC could adequately portray the rich and deep history of the site. Historic Royal Palaces have also expressed such reservations. They would also like to see more audience development and use of innovative and engaging technology on-site to explore ruins and a commitment to annual public access to ruins. Furthermore, they have encouraged contributions from a wider range of specialists to be involved in final plans, including a steering committee. The applicant has agreed to an Archaeological and Heritage Outreach & Interpretation Strategy which would provide the framework for presentation of historic material around the site and would include provisions for a steering group to help shape the finer details of presentation on and off the site.

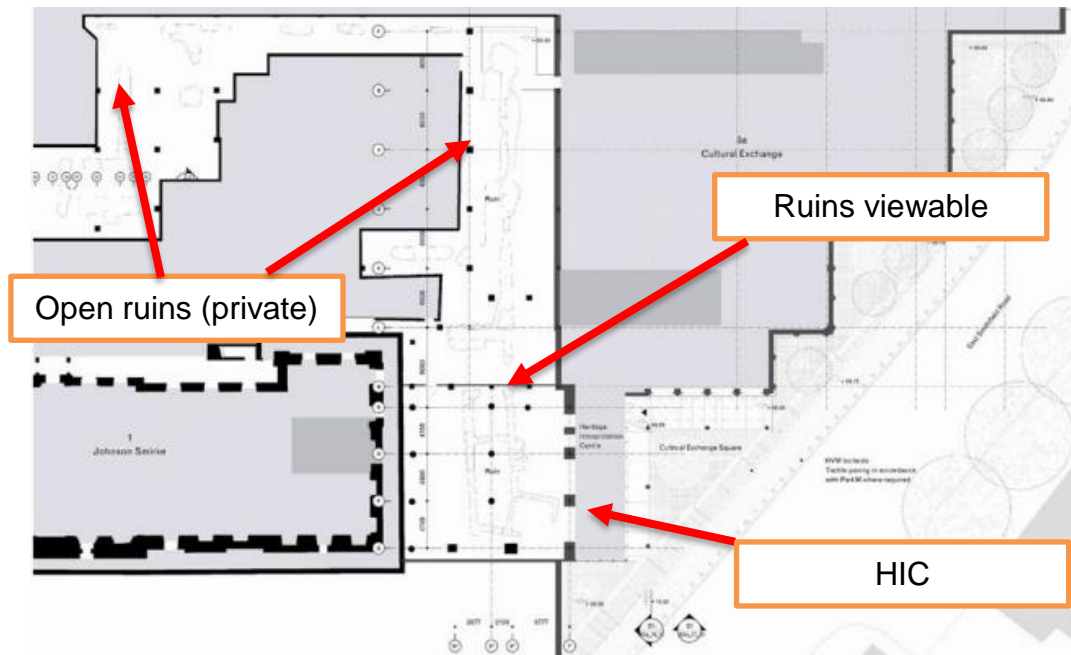


Figure 23: Location of preserved archaeological ruins at lower ground level in relation to HIC

- 7.74 Prior to the 1986 planning permissions and redevelopment, there was an ambition for the Royal Mint Court site to host significant museum or gallery space which would attract tourists and re-stitch the site to the wider attractions of the Tower of London WHS and Grade I listed Tower Bridge. From the pre-application stage in the 1970s up until the 1986 planning applications, plans evolved to showcase both the Royal Mint collection and remains of the Cistercian Abbey in separate museums on the site. It is understood that 5,986sqm of museum space was secured in the 1986 consent. Figure 23 shows that the Cistercian Abbey ruins are still preserved in walk-through basement rooms. Subsequently, the museum space first secured in 1986 does not appear to have opened, however it is understood that visitors to a former sports centre on-site were able to view some of the ruins behind glazed walls, following an amended application.
- 7.75 The lapsed 2017 consent included a 50sqm heritage interpretation centre at ground floor level but also allowed public access around the site to interact directly with heritage assets. The 2017 lapsed consent also allowed some public access to ruins at certain times of the year and included provisions for better integration of archaeological assets with site uses.
- 7.76 Officers would have liked to have secured greater integration of ruins with other uses on-site including a wider range of private views. The ruins were originally preserved in such a way so that they could be showcased in the future, however they are mainly being left in an underutilised state. It is understood that access could be granted to certain specialist archaeological groups by appointment and via the Open House, annual public touring scheme. These elements would be secured by s106 legal agreement, subject to planning approval.
- 7.77 Officers and the applicant have engaged 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. Although off-site display space has not been secured, officers would request a reasonable endeavours clause to explore an option to display the material off-site, to be secured by s106 legal agreement, subject to planning approval.
- 7.78 GLAAS have referenced in their consultation response a number of other developments from the past few years which have secured extensive archaeological display and interpretation spaces as a result of ruins found on-site. The proposed development would provide 75sqm heritage interpretation space all year round, which is modest in size and significantly less than

what has been secured in some other developments around London. Along with the additional 360sqm heritage interpretation space within the Cultural Exchange building, the overall quantum of display space would be acceptable, along with other interpretative material which would be secured around the site including works in the public realm; albeit the fact that the additional 360sqm space would only be open to the public for 6 months per year would dilute this heritage benefits.

- 7.79 Subject to planning approval, s106 legal obligations would be required to secure an Archaeology Conservation Management Plan (ACMP) to demonstrate how archaeological materials would be conserved on the site, along with an Archaeological and Heritage Outreach & Interpretation Strategy (AOIS) to demonstrate how historic material within and around the site would be displayed and exhibited appropriately. In light of the above, it is considered that the archaeological offer would be acceptable and in accordance with Development Plan policies and the tests within the NPPF. In regard to the less than substantial harm identified to below-ground archaeological heritage assets, public benefits of the proposal are considered to outweigh this, including regeneration of the site, employment opportunities, public realm improvements and display spaces in and around the site to provide an opportunity to tell the history of the site and bring it to life through display and interpretation of heritage material.

World Heritage Site Conclusion

- 7.80 The proposal as submitted would conserve and safeguard the Outstanding Universal Value of the World Heritage Site. Along with the Urban Realm Study, AOIS and highways improvement works to the locality including signage and way-finding, the proposal would comply with policy S.D5 by improving pedestrian and cycle routes, and it would enhance the Outstanding Universal Value of the World Heritage Site.

Fire Safety

- 7.81 Policy D12 of the London Plan seeks to ensure that development proposals achieve the highest standards of fire safety, beyond what is covered by Part B of the Building Regulations, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, considering issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole.
- 7.82 The application is supported by a Fire Safety Statement prepared by Cundall, and demonstrates that the above requirements have been addressed, and that the development complies with London Plan Policy D12. Compliance with the fire statement would be secured by condition, subject to planning approval.

PUBLIC SAFETY AND SECURITY

- 7.83 Development Plan policies seek to ensure that new development would result in a safer environment for future residents and visitor to the site and reduce the fear of crime. London Plan policy D11 states that *'development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.'*
- 7.84 The application has been reviewed by the Metropolitan Police Service (MPS) and has included advice from a Counter Terrorism Security Advisor (CTSA). Officers are content that security to the application site has been fully considered and planned within proposed designs in order to sufficiently protect the embassy use. The MPS has provided advice about security implications arising from the proposed development. Subsequently officers have recommended planning

conditions, obligations and highway improvements which would be secured to make the application acceptable in this regard. The MPS has also provided recommendations which fall outside of the remit of planning and will be dealt with by other agencies.

- 7.85 The MPS identified a number of potential improvements to accesses of St Mary Grace's Court residential buildings and subsequently the applicant has agreed to fund the implementation of alterations to rectify these, which would serve the purpose of increasing the security of neighbouring buildings and the application site. These would be secured by Grampian (used for land which falls outside the application site) condition, subject to planning approval.
- 7.86 The applicant has proposed vehicle mitigation (HVM) bollards around key areas of the site; around the site frontage public realm, around the Cultural Exchange Building public realm, and around the small, public square towards the rear, adjacent to Cartwright Square. This would be secured by s278 legal agreement, subject to planning approval.
- 7.87 The applicant has submitted a Pedestrian Comfort Level Assessment in regard to space for potential protests which could take place around the application site. This has been assessed by TfL who have requested an Event/ Protest Management Plan to be secured by s106 legal obligation, subject to planning approval in order to enable strategies to aid the continued flow of pedestrian and vehicular traffic in case of site events or protests. This document would be reviewed on, at least, an annual basis, in consultation with key stakeholders such as LBTH Community Safety, the MPS and TfL and would detail the measures on the site and in the surrounding area, to deal with influxes of people.
- 7.88 Neighbours have raised concerns over Royal Mint Green, a publicly accessible open space on Cartwright Street, which was subject to disturbance during a protest recently. Anxiety that this space may become a gathering point by future protestors and its vulnerability to serving this function is accentuated by its existing condition that does not make it attractive to be used by the local community, including young children as a play area, from the surrounding Royal Mint residential estate. The applicant has recognised these vulnerabilities and shortcomings in the context of the proposed neighbouring development and agreed to mitigate against such outcomes through a £75,000 contribution (secured by s106 legal agreement, subject to planning approval) to fund landscaping improvements to Royal Mint Green, facilitating a more practical and attractive layout including potential play space and gym equipment, which would encourage people to use the space in an appropriate way.
- 7.89 LBTH Community Safety have advised that it may be advantageous to install additional cameras in certain locations to monitor and manage gatherings, protests or increases in crime. The applicant has agreed to a financial contribution of £223,853 to provide additional closed-circuit television (CCTV) coverage, managed by the Council, around the perimeter of the site.
- 7.90 The MPS CTSA advised that it would be beneficial to undertake a blast assessment for the public realm and neighbouring buildings to better inform the decision maker of any potential impacts linked to the use of explosive devices. Apart from large embassies, blast assessments are, on occasion, advised and undertaken for a range of buildings that may attract large crowds such as sports stadia, large railway stations, shopping malls or locations with high daily transitory populations such as financial districts.
- 7.91 The Council commissioned a blast assessment which was undertaken by a competent blast assessor on the Register of Security Engineers and Specialists (RSES). The MPS CTSA reviewed the blast assessment and provided a list of recommendations. The Council have taken these recommendations into consideration and have agreed to secure them as conditions or legal obligations, subject to planning approval. Non-planning recommendations would be passed to other relevant agencies.

- 7.92 The blast assessment has identified that successful blast events in selected locations would result in injuries and deaths to passers-by as well as structural damage and potential building collapse. The blast assessment must be framed in the context of the likelihood of such an event (blast) occurring. The CTSA has advised that there is no evidence that the application site itself is at greater risk of terrorism compared with the general threat level in the UK. However, 'Crowded Places' and 'Publicly Accessible Locations' with limited protective security measures are considered to be the most attractive places for potential terrorist activity. Taking account of the advice of the CTSA, there is no evidence that an embassy in this location presents a significantly greater terrorist risk than any other major embassy in London.
- 7.93 The CTSA has advised that blast attacks are considerably less likely than other, less sophisticated potential attack methodologies due to their complex nature and the ways in which explosive materials are well regulated and difficult to source in the UK.
- 7.94 Further to the security-related conditions and legal obligations outlined above, the CTSA has recommended that local street lighting and provision of refuse bins should be reviewed and potentially replaced in order to further reduce any potential risk – these elements would be secured by legal obligation, subject to planning approval. Other, non-planning recommendations that the CTSA has advised include (not an exhaustive list):
- Add this location to Tower Hamlets Multi-Agency Borough Risk Register
 - Testing drills for terrorist activities
 - Any Council staff or those contracted who have a role linked to the site should have relevant counter-terrorism awareness training
- 7.95 The CTSA advice has been provided in accordance with their security recommendations having to abide by JASPAR principles of being Justifiable, Achievable, Sustainable, Practical, Affordable, Reasonable. The CTSA recommends that a proportionate response might be to implement broader mitigation strategies to manage the associated security risks, rather than focus on physical blast mitigation solutions that will not be sufficiently effective, also taking into account the likelihood of a blast event occurring.
- 7.96 Further to the above, the National Planning Policy Framework (NPPF) states that planning conditions must be necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. The NPPF states that legal planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.
- 7.97 Security concerns of local residents may be capable of amounting to a material consideration when determining a planning application. However, the weight to be given to these issues as material planning considerations should be informed by a reasonable evidential basis. The security concerns raised by residents have been considered and advice has been taken from the Metropolitan Police Counter Terrorism Advisor.
- 7.98 For the reasons above, it is considered that the broad security measures (HVM bollards, Event/ Protest Management Plan, improvements to St Mary Grace's Court accesses, Royal Mint Green financial contribution, CCTV financial contribution, street lighting and refuse bin review and possible replacement) outlined to be secured by grant of planning consent would be sufficiently appropriate and proportionate to maintain security around the application site.
- 7.99 Metropolitan Police Service are ultimately responsible for managing security around the embassy, which would fall to them when the embassy becomes operational, working in close

partnership with key stakeholders internally and externally including Transport for London in relation to safe movement of traffic and working with the Council.

- 7.100 It must be made clear that the Metropolitan Police have not objected to the planning application. An embassy in this location is considered to be acceptable in land use terms. For the reasons above, it is considered that security provision of the site would be acceptable and in accordance with Development Plan policies.

AMENITY

- 7.101 Development Plan policies seek to protect and where possible enhance neighbour amenity by safeguarding privacy, avoiding unreasonable levels of overlooking, sense of enclosure, outlook, noise, light, odour, fumes, dust and ensuring acceptable daylight and sunlight conditions.

Outlook, Sense of Enclosure and Privacy

- 7.102 In terms of height, scale and massing, it is considered that the proposed development achieves an acceptable relationship with the surrounding, existing built environment. The proposal would only result in some marginal increases in height towards the neighbouring St Mary Grace's Court to the east, although these increases also need to be considered alongside other reductions in massing and height elsewhere in relation to St Mary Grace's Court. There would also be a marginal increase in height on Royal Mint Street towards the Royal Mint Gardens development to the north, similarly some marginal increases in height along the East Smithfield edge but these need to be balanced against other reductions in the overall mass and building envelope in this location.

- 7.103 Figure 24 shows the proposed separation distances with housing at St Mary Grace's Court to the rear. The separation distances proposed would actually be greater than that which exists at present with St Mary Grace's Court. Notwithstanding the above, a package of additional privacy measures (such as angled fins or obscured glazing) would be secured by condition to ensure that any windows facing St Mary Grace's Court at less than 18m separation would not suffer from direct mutual overlooking. In regard to sense of enclosure, any changes would be marginal, with the increased separation distances and variation in height and massing.



Figure 24: Separation distances with St Mary Grace's Court housing to rear

Figure 25 shows the proposed development in context with surrounding residential buildings. There would be a marginally increased sense of enclosure to some homes set the to the north along Royal Mint Street. Generally, however the proposals would not significantly adversely

impact on outlook, sense of enclosure, privacy or overlooking to neighbouring residential homes, and where there are impacts they are limited in degree to the effected homes.

Daylight, Sunlight & Overshadowing

Guidance

- 7.104 Policy D.DH8 seeks to ensure that development must not result in an unacceptable material deterioration of the sunlight and daylight conditions of surrounding development and must not result in an unacceptable level of overshadowing to surrounding open space and private outdoor space. Supporting text of the policy states that a daylight and sunlight assessment, following the most recent version of the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011) ('BRE handbook') must accompany all major planning applications
- 7.105 The BRE handbook provides guidance on daylight and sunlight matters. It is important to note, however, that this document is a guide whose stated aim *'is to help rather than constrain the designer.'* The BRE handbook states that for calculating daylight to neighbouring properties affected by a proposed development, vertical sky component (VSC) and daylight distribution (NSL – no sky line) assessments are to be undertaken.

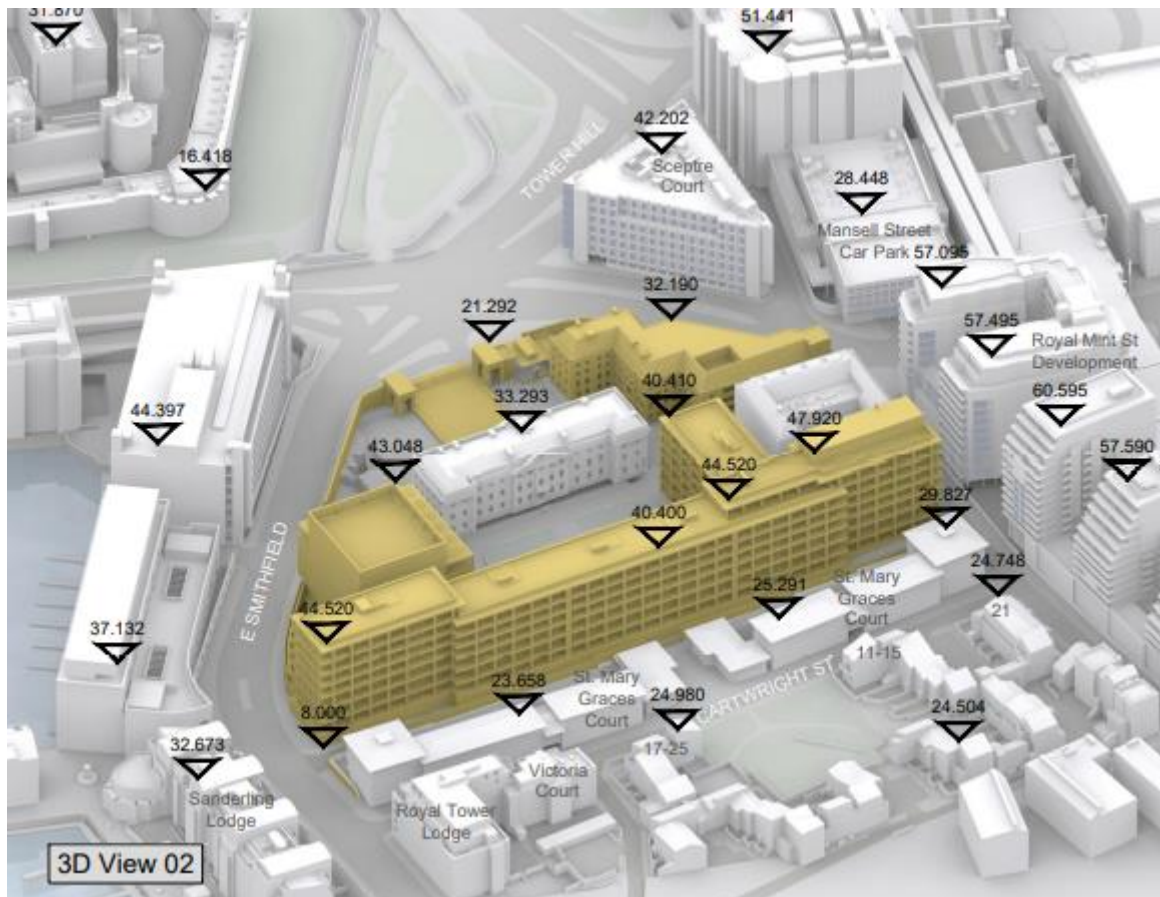


Figure 25: Proposed relationship with neighbouring residential dwellings

- 7.106 VSC is a daylight measure that represents the amount of visible sky that can be seen from the mid-point of a window, from over and around an obstruction in front of the window. That area of visible sky is expressed as a percentage of an unobstructed hemisphere of sky, and, therefore, represents the amount of daylight available for that particular window; however it does not take into account the number or sizes of windows to a room, room dimensions or the properties of the window itself. The BRE handbook suggests that a window should retain at least 27% VSC or retain at least 80% of the pre-development VSC value to ensure sufficient daylight is still

reaching windows. The 27% VSC value is a target applied for all building typologies and urban environments.

- 7.107 No-sky line (NSL) is a separate daylight measure assessing the distribution of diffuse daylight within a room, otherwise known as daylight distribution (DD). NSL assesses where daylight falls within the room at the working plane (850mm above floor level in houses). Daylight distribution assessment is only recommended by the BRE Report where room layouts are known, however they can also be useful when based on estimated layouts. The NSL simply follows the division between those parts of a room that can receive some direct skylight and those that cannot. Where large parts of the working plane lie beyond the NSL, the internal natural lighting conditions will be poor regardless of the VSC value, and where there is significant movement in the position of the NSL contour following a development, the impact on internal amenity can be significant.
- 7.108 When comparing the NSL for existing buildings against that proposed following development, BRE guidelines state that if the NSL moves so that the area of the existing room which receives direct skylight is reduced to less than 0.8 times its former value, then this will be noticeable to the occupants, and more of the room will appear poorly lit.
- 7.109 Average daylight factor (ADF) is a measure of the adequacy of diffuse daylight within a room, and accounts for factors such as the size of a window in relation to the size of the room; the reflectance of the walls; and, the nature of the glazing and number of windows. A small room with a large window will be better illuminated by daylight compared to a large room with a small window, and the ADF measure accounts for this. ADF is most appropriately used to assess daylight levels for proposed residential homes, as opposed to existing homes that are occupied.
- 7.110 BRE guidelines confirm that the acceptable minimum ADF target value depends on the room use. That is 1% for a bedroom, 1.5% for a living room and 2% for a family kitchen. In cases where one room serves more than one purpose, the minimum ADF should be that for the room type with the higher value. Notwithstanding this, it could be considered that, in practice, the principal use of rooms designed as a 'living room/kitchen/dining room' is as a living room. Accordingly, it would be reasonable to apply a target of 1.5% to such rooms.
- 7.111 The BRE handbook states that when calculating sunlight to neighbouring properties affected by a proposed development, annual probable sunlight hours (APSH) is a measure of direct sunlight that a given window may expect over a year period. The BRE handbook recommends that in existing buildings, sunlight should be checked for all habitable rooms and conservatories of dwellings if they have a window facing within 90° of due south. The BRE handbook recommends that the APSH received at a given window in the proposed case should be at least 25% of the annual total available, including at least 5% in winter. Where the proposed values fall short of these, and the loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period.
- 7.112 In terms of overshadowing BRE guidance suggests that for an amenity area, like a garden, to appear sunlit throughout the year, at least 50% of the garden or amenity area should receive 2 hours of sunlight on 21st March (21st March is the equinox month and is the set day for testing overshadowing in accordance with the BRE criteria). If existing open spaces do not meet the above criteria as a result of proposed development, and the area which can receive 2 hours of sun on 21st March reduces by more than 20% of its former value, then the loss of sunlight may be noticeable, representing an adverse impact.
- 7.113 There is no definitive categorisation for impacts that exceed BRE guidelines, however the significance criteria banding within Figure 26 below is used by the Council as a guideline when summarising the overall daylight and sunlight effects to surrounding buildings.

Reduction to daylight (VSC & NSL) and Sunlight (APSH & WPSH)	Effect classification
Negligible effect	0% to 20% reduction
Minor adverse effect	20.1% to 30% reduction
Moderate adverse effect	30.1% to 40% reduction
Major adverse effect	more than 40% reduction

Figure 26: Daylight and sunlight effect classification

Assessment

- 7.114 The application is supported by a Daylight and Sunlight Report by Delva Patman Redler. The Council have appointed an independent consultant (BRE) to review the assessment submitted by the applicant.
- 7.115 Officers have had regard to the results of the daylight and sunlight assessments (summarised in Figure 27). It is noted that a proportion of the windows tested would experience a material deterioration in the amount of daylight and/or sunlight that they receive. The assessment below will focus on these properties.

Properties	Compliance for VSC daylight	Compliance for NSL daylight	Compliance for APSH (sunlight)
St Mary Grace's Court	132/179 windows (74%)	50/179 rooms (28%)	38/40 rooms (95%)
Royal Mint Gardens	60/69 windows (93%)	69/69 rooms (100%)	51/52 rooms (98%)
11-15 Cartwright Street	13/13 windows (100%)	11/13 rooms (85%)	8/8 rooms (100%)
17-25 Cartwright Street	11/11 windows (100%)	9/11 rooms (82%)	7/7 rooms (100%)
Sanderling Lodge	28/28 windows (100%)	28/28 rooms (100%)	N/A
21 Royal Mint Street	2/2 windows (100%)	2/2 windows (100%)	N/A
Victoria Court	12/12 windows (100%)	12/12 windows (100%)	N/A
Royal Tower Lodge	42/42 windows (100%)	42/42 windows (100%)	48/48 rooms (100%)

Figure 27: Daylight overall effects on neighbouring buildings

- 7.116 Officers have had regard to the results of the daylight and sunlight assessments – it is noted that a proportion of the windows tested would experience a material deterioration in the amount of daylight and/or sunlight that they receive. Loss of daylight or sunlight to all dwellings in Royal Tower Lodge, Victoria Court, 21 Royal Mint Street and Sanderling Lodge would be within BRE guidelines and classed as negligible.

7.117 The groups of properties that are considered to experience overall significant daylight effects are St Mary Grace's Court, Royal Mint Gardens, 11-15 and 17-25 Cartwright Street. The assessment below will focus on these properties.

- St Mary Grace's Court

7.118 St Mary Grace's Court is a part-2, part-4, part-5 storey residential building, which contains some commercial units at ground floor level facing a small, public square. 132 of 179 windows tested would meet BRE guidance for VSC daylight. Of the remaining 47 windows, 18 would see a minor adverse, 9 a moderate adverse and 20 a major adverse impact.

7.119 With the proposed development in place, 50 of the 179 rooms would meet the BRE guidance for NSL daylight. Of the remaining 129 windows, 50 would see a minor adverse, 30 a moderate adverse and 49 a major adverse impact. 3 windows which fail VSC daylight would be served by rooms which pass for NSL daylight.

7.120 In regard to sunlight, for the 38 of 40 windows tested facing within 90° of due south would be BRE compliant.

7.121 The most serious failures are found on top floors of the residential buildings under overhanging eaves. In these circumstances, it is accepted in the BRE handbook that existing windows with overhangs above them typically receive less daylight because the overhang cuts out light from the top part of the sky; therefore, even a modest proposed development set opposite may result in a large relative impact on daylight or sunlight.

7.122 An additional assessment without the overhanging eaves that was undertaken demonstrates that in this scenario only 4 windows would fail for VSC daylight rather than the original 47. This indicates that the overhanging eaves of St Mary Grace's Court would be a significant self-limiting factor with any development which came forwards.

7.123 The Council's appointed independent consultant assesses the impact to daylight as minor adverse overall. Overall, the proposal would result in some significant daylight impacts to St Mary Grace's Court. Taking into consideration the general level of compliance for VSC daylight, the significant self-limiting impact of overhanging eaves, and the negligible impact on sunlight, along with the improved separation distance and massing of the development, it is considered that the retained amenity to St Mary Grace's Court would be acceptable on balance and would not warrant refusal of the scheme.

- Royal Mint Gardens

7.124 Royal Mint Gardens is a development ranging from 3 to 15 storeys consisting of 4 linked buildings along Royal Mint Street with a piazza space and commercial unit facing this area. An unbuilt phase of the site lies at the corner with Mansell Street and is also planned to include a hotel. With the proposed development in place, 60 of 69 windows tested would meet BRE guidance for VSC daylight. Of the remaining 9 windows, 7 would see a minor adverse, 2 a moderate adverse and 0 a major adverse impact. With the proposed development in place, all rooms would meet the BRE guidance for NSL daylight.

7.125 4 of the windows with VSC failures are in rooms which have another window that would be less affected, and loss of light to the room as a whole would be within the guidelines. The affected windows all have balconies above them which limit light from the sky; in these circumstances the BRE guidelines suggest carrying out another calculation without the balconies. In the assessment without balconies, loss of light to all windows would be within the BRE guidelines, indicating that the balconies are a significant factor in the relative loss of light.

7.126 The affected windows are all located in the part of the Royal Mint Gardens development which has not been built yet. For unbuilt development, where occupants would not be in place to notice

changes to daylight, the ADF assessment is considered most appropriate. The windows with VSC failures would pass the ADF assessment.

7.127 In regard to sunlight, all of the windows tested facing within 90° of due south would be BRE compliant.

7.128 The Council's appointed independent consultant assesses the impact to daylight as minor adverse overall, but negligible to the parts of the development already built. Overall, the proposal would result in a limited number of daylight failures to Royal Mint Gardens. Taking into consideration all the rooms would meet the daylight distribution (NSL target) target figures, the general good level compliance, no windows experiencing major adverse impacts and only two a moderate adverse VSC results along with ADF daylight target levels, it is concluded that the retained amenity to Royal Mint Gardens would be acceptable.

- 11-15 and 17-25 Cartwright Street

7.129 11-15 and 17-25 Cartwright Street are 2 to 4 storey residential buildings to the east of St Mary Grace's Court. With the proposed development in place, all windows/rooms tested would meet BRE guidance for VSC daylight and APSH sunlight. With the proposed development in place, 11 of 13 rooms would meet the BRE guidance for NSL daylight. The Council's appointed independent consultant assesses the impact to daylight as minor adverse overall. The impact to daylight and sunlight to these units is considered to be acceptable.

Overshadowing to Public Amenity Spaces

7.130 Officers are satisfied that the proposed development would not give rise to unacceptable impacts on sunlight to public amenity spaces. In order to comply with BRE guidance, an amenity area should receive more than 50% coverage of sun-on-the-ground for 2 hours on 21 March (spring equinox). All relevant public amenity spaces in the vicinity have been tested and would easily pass BRE criteria, demonstrating that there would be none or negligible impacts.

Daylight and Sunlight Conclusion

7.131 Officers have had regard to the daylight and sunlight results relating to the properties surrounding the proposed development listed above. Whilst the proposal would give rise to some adverse effects to nearby residential windows, officers consider these impacts to be acceptable in the context of overall retained amenity. Officers have reached this conclusion based on the factors listed below:

- The applicant has demonstrated that eaves at St Mary Grace's Court and balconies at Royal Mint Gardens are a significant contributor to compromised daylight levels.
- Acceptable separation distances are maintained around the site. The development is generally not considered to give rise to other significant adverse impacts on neighbouring homes in terms of outlook, sense of enclosure, overlooking and privacy.
- Impacts on sunlight are relatively minimal taking into consideration the scale of development.
- Some of the residential properties impacted by the proposed development benefit from dual aspect outlook. These residential units are therefore also likely to have other windows which remain unaffected.
- A more impactful development was previously granted planning permission on the site in 2017 and the proposed development is more sensitive in regard to height, scale and massing.

- 7.132 Under the chapter titled 'Achieving appropriate densities' in the NPPF, paragraph 123 (c) states that for housing applications, a flexible approach to applying daylight and sunlight policies or guidance should be applied where they would otherwise inhibit an efficient use of the site (as long as the resulting scheme would provide acceptable living standards,
- 7.133 To conclude, in the context of Policy D.H8, the proposed development would result in material deterioration to the daylight and sunlight levels at neighbouring properties and therefore, result in a level of impact to neighbouring amenity. Nevertheless, in the context of the factors set out above, officers consider this impact to be acceptable and that the scheme would comply with paragraph 123 of the NPPF.

Noise and Vibration

- 7.134 The Council's Environmental Health (Noise) Officer has reviewed the application with regard to noise and vibration. Any comments received have been incorporated into the below assessment. A baseline noise survey has been undertaken by the applicant in order to determine the existing noise conditions at the application site. The submitted ES generally reports significant adverse effects for demolition and construction noise and vibration.
- 7.135 The main sources of noise incidents at the site are general road traffic, trains and aircraft. Receptors sensitive to changes in noise and vibration would be surrounding residents.
- 7.136 Potential sources of noise and vibration from the development would be from demolition and construction, operation of the embassy and accommodation uses, external plant, deliveries and servicing, car park noise and road traffic. It is proposed that mitigation measures (i.e. sound insulation) are incorporated into the proposed design to ensure that the limits are complied with. The Noise Officer has specified conditions, subject to approval, in regard to securing a noise verification report for new residential units, details of noise from plant and construction noise and vibration limits. Further to this and in order to ensure the suitability of the proposed uses, the development is expected to comply with the noise limits set out in the Local Plan.

Construction Impacts

- 7.137 Officers have had regard to the construction impacts of the proposed development. It is noted that local residents have raised concerns relating to the impact of the construction phase with regards to dust, odour, noise, light pollution, and increased traffic. The series of differing construction impacts have mainly been examined through the EIA process...
- 7.138 The applicant would need to submit a further Construction Environmental Management Plan (CEMP) for approval by the Council, which would confirm how the construction process for the various development phases would be controlled and delivered. This Plan would again establish acceptable baseline conditions in respect of potential nuisances but would also include details of how the applicant would manage site conditions in respect of its new residents who would be occupying completed phases alongside those being built out. Furthermore, the document would set out how the applicant would continue their engagement and maintain communication with the local community and specifically residents living adjacent to the site, through the duration of the works.
- 7.139 Subject to approval, conditions would be required in order to secure submission of the CEMP with full details of hours of work, vehicular movements to and from the site, potential of waterbourne freight, contractor parking, as well as the requirement to comply with the Code of Construction Practice. Subject to the above being secured, officers are satisfied that the construction phase would be appropriately managed to protect the amenity of neighbour residents and future residents of the scheme.

Conclusion

7.140 Although some adverse amenity impacts have been identified, along with mitigations proposed, it is considered that retained amenity for neighbours would be acceptable overall.

HIGHWAYS AND TRANSPORT

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

Car Parking

7.142 Development Plan Policies promote sustainable modes of transport and seek to limit the number of private vehicle trips. Development proposals are therefore required to eliminate or minimise the quantum of car parking, and associated vehicular trips, dependent upon the specific set of circumstances presented by the application site.

7.143 There are currently 45 car parking spaces within the site. These are provided in two locations; adjacent to the service road behind Murray and Dexter House (35 spaces), and in a car park/service yard below the Registry building (10 spaces). There is also some informal car parking which takes place at surface level in the main front courtyard.

7.144 The 2017 lapsed consent permitted a reduction in car parking spaces to 25. It is understood that the existing Chinese Embassy currently holds 130-150 on-street car parking permits in the London Borough of Westminster. 85 car parking spaces are proposed on-site within the basement (consisting of 8 spaces for maintenance vehicles, 5 for visiting delegations, 15 for VIP events, 57 for official cars).

7.145 Development Plan policies state that car-free development should be the starting point for all proposals in places that are well connected by public transport, such as this and sui generis residential uses should also be car free. It is acknowledged that some car parking spaces, greater than would usually be allowed by the London Plan policy, will be required for the unique nature of an Embassy especially for parking state vehicles (or similar) for a longer term. However, this should not undermine strategic policies to increase sustainable travel, reduce car dominance and achieve the Mayor of London's Vision Zero goal to eliminate all deaths and serious injury from London's Transport Network by 2041.

7.146 The number of proposed car parking spaces has been significantly decreased a number of times since the first pre-application submission and also post-submission of the planning application when there were 148 spaces proposed. The proposed number of spaces is now in line with other recent embassy permissions in London of a similar scale.

7.147 The understanding is the level of car parking within the scheme would result in a London-wide net reduction of on-street car parking required by the Chinese Embassy. All proposed car parking would benefit from active electric vehicle charging points (including 30% fast-charging) with 15 spaces provided as wheelchair accessible. Although the car parking levels proposed are in excess of Development Plan policy numbers and what LBTH Highways and TfL would ideally like to see on the site, the unique nature of the use has been taken into consideration and the car parking levels associated with the scheme are considered to be acceptable, and a car parking management plan would be secured by condition, subject to planning approval.

Cycle Parking and Facilities

7.148 Development Plan Policies require the proposed development to maximise opportunities to support and encourage sustainable transport modes. This includes the provision of safe and secure cycle storage on site to encourage residents and employees to cycle. It further prescribes the quantum and quality of cycle storage facilities required by new development.

- 7.149 The proposal includes 413 long stay cycle parking spaces within the basement of the site, comprising a mix of two-tier racks (390 spaces), Sheffield stands (12 spaces) and wider, accessible spaces (11 spaces) along with associated showers, lockers and changing facilities. The applicant has suggested that the proposed cycle parking on-site would significantly exceed demand, however the quantum is in accordance with London Plan policy T5 and considered to be acceptable.
- 7.150 In regard to short stay cycle parking spaces for members of the public visiting the site, 6 Sheffield stands are proposed within the public realm on Mansell Street. It is important that the provision of cycle parking and other public realm improvements are carefully managed in terms of security /safety aspects of the site. Whilst this level of provision is noted to be below London Plan requirements, the applicant has committed to funding for additional spaces which would need to be located in appropriate locations and secured within the s278 legal agreement. A final cycle parking management plan would be secured by condition, subject to planning approval.

Trip Generation

- 7.151 A trip generation assessment has also been undertaken by the applicant to enable consideration of the potential level of additional trips that would be generated by the proposed development. A significant proportion of the embassy staff would live on-site, with work-related trips remaining internal to the site. On this basis, the forecast daily and peak hour trips generated by the proposals do not warrant any mitigation on the public transport network. Moreover, it is agreed that the current embassy proposals would generate a significant reduction in trips when compared to the existing use (when the office spaces were active and fully operational and actively used) and against the previous planning permission.
- 7.152 The number of vehicle trips is not forecast to generate any significant impacts on the road network but on-going site management would be required to ensure that vehicle trips and associated security measures are accommodated safely and efficiently without causing delay to other road users on the immediate surrounding road network including pedestrians and cyclists.
- 7.153 A Framework Travel Plan setting out a range of measures to encourage active and sustainable travel has been provided. It highlights the wide range of public transport and active travel facilities surrounding the site. A final version of the Travel Plans would be secured and monitored by S106 legal agreement, subject to approval.

Vehicular and Pedestrian Access

- 7.154 The proposed development retains the existing pedestrian accesses in largely the same locations, with the addition of security checks, enhanced public realm and circulation space. This is an acceptable approach. A pedestrian access to the staff accommodation will be on Cartwright Street at the east of the site, via a new step-free bridge over the site's servicing access road.
- 7.155 The access to the subway from within the site would be permanently closed. This is accepted in principle, subject to detailed design which will need to address the potential for dead space and a hostile environment. Enhancements to the retained subway entrance on East Smithfield would be required and if consent is granted these would be secured by s278. Access for cyclists is proposed via the servicing access on East Smithfield. This will lead directly to the long-stay cycle parking spaces in the basement; appropriate signage and delineation would be incorporated to ensure the safety of cyclists sharing the servicing route vehicles.
- 7.156 Existing vehicle access is provided at the junction of Mansell Street and East Smithfield using a one-way arrangement. A private one-way south to north road runs along the rear at the eastern boundary. No new vehicle accesses are proposed as part of the development, but some amendments are outlined.

- 7.157 Access for servicing vehicles and the basement car parking would be provided via the existing East Smithfield junction. Amendments here are proposed to enable two-way operations and an all-movements junction. This has been the subject of a stage 1 Road Safety Audit and subsequent Designer's Response and this has been reviewed by TfL and found to be acceptable in principle; final details would be secured by condition, subject to planning approval.
- 7.158 At the front entrance of the site (Mansell St / East Smithfield), an access for ceremonial vehicles would be provided at the northern entrance lodge, with a backup at the adjacent southern lodge, both operating as two-way. The existing site egress on to Royal Mint Street would be retained for vehicles only. Also, at the front entrance, a shared surface revised taxi rank layout is proposed, maintaining space for three taxis. Again, the principle of these proposals is accepted, subject to detailed design submissions.
- 7.159 In addition to the above, hostile vehicle mitigation (HVM) is proposed around the front entrance to the site, the Cartwright Street entrance and East Smithfield visa and HIC public realm. This has been rationalised during the pre-application process and it is understood that the recommendations of the Metropolitan Police have been incorporated.

Deliveries & Servicing (including Waste)

- 7.160 The application proposes that all servicing takes place within the development with a number of internal loading bay and security check points. Servicing will predominantly be kept to the eastern vehicular service road. In terms of refuse collection, the application provides a Waste Management Strategy in respect of the main embassy function and ancillary residential elements. Subject to planning approval, a condition would be required to secure submission of final site-wide deliveries and servicing and waste management plans.

Public Realm

- 7.161 The site suffers from being surrounded by a relatively harsh and car dominated urban landscape being surrounded by strategic roads with high vehicle flows. Enhancements to the public realm are proposed around the perimeter of the site; although somewhat limited by the security requirements imposed by an embassy operation, these are welcomed and would help to improve the immediate site surroundings. The public realm improvements include footway enhancements, planting, lighting and addressing existing level differences. Some heritage interventions are also proposed such as public artwork and signage.
- 7.162 An active travel zone (ATZ) assessment has been undertaken and identifies a number of areas for improvement on key active travel routes to and from the site, including surface level improvements to Minories, Tower Hill and Mansell Street. The applicant has agreed to provide funding for these improvements via s278 legal agreement (which would also secure, but not be limited to, footway improvements, construction reparations, planting, short stay cycle parking, subway improvements and road safety improvements in the locality affected by the proposals) subject to planning approval. Funding (£200,000) for an Urban Realm Study has also been secured in order to further improve the public realm in respect of the prominent East Smithfield/ Tower Hill/ Mansell Street junction as shown in Figure 24.

Demolition and Construction Traffic

- 7.163 The Construction Environmental Management Plan (CEMP) secured via condition, subject to planning approval, would assess the impact on pedestrians, cyclists, and vehicles as well as fully considering the impact on other developments in close proximity. With the close proximity of the River Thames, the potential use of water-borne freight would also need to be explored.

Highways Conclusion

7.164 Highways proposals are considered to be acceptable and in accordance with the Development Plan. TfL and LBTH Highways have confirmed that they have no objection to the proposals, subject to conditions and s106 obligations identified above, that would be secured subject to planning approval.

ENVIRONMENT

Environmental Impact Assessment

7.165 The planning application constitutes an Environmental Impact Assessment (EIA) development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations) and is accompanied by an Environmental Statement (ES) coordinated by Arup.

7.166 Regulation 3 prohibits the Council from granting planning permission without consideration of the 'environmental information' that comprises the ES, including any further information submitted following request(s) under Regulation 25 and any other information, any representations made by consultation bodies or by any other person about the environmental effects of the development.

7.167 The submitted ES assesses the environmental impacts of the development under the following topics:

- Air Quality;
- Archaeology;
- Built Heritage;
- Climate Change;
- Contaminated Land;
- Daylight, Sunlight, Shadowing and Solar Glare;
- Noise and Vibration; and
- Townscape and Visual Impact Assessment.

7.168 The ES has been reviewed in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations).

7.169 The Council has appointed Temple Group Consulting to independently examine the ES, to prepare an Interim Review Report (IRR) and to confirm whether the ES satisfies the Regulations. This is supported by reviews by the Authority's internal environmental specialists. The IRR dated 9th August 2021 identified clarifications and potential 'further information' required under Regulation 25. Clarifications were sought across a broad range of topics, with potential Regulation 25 'further information' identified within the following topics: Scheme and Site Information; ES Scope; Built Heritage; and Climate Change.

7.170 In response to the IRR, the Applicant submitted on the 1st October 2021 an Interim Review Report Response. On the 29th October 2021, Temple issued a Final Review Report (FRR) that took account of the Applicant's Interim Review Report Responses which identified that clarifications sought, and Potential Regulation 25 requests remained unacceptable in relation to Built Heritage; Climate Change; and Daylight, Sunlight, Shadowing and Solar Glare.

- 7.171 In response to the FRR, the Applicant submitted on the 13th December 2021 a Final Review Report Response. On the 10th January 2022, Temple issued a FRR 002 that took account of the Applicant's Final Review Report Responses which identified that clarifications sought, and Potential Regulation 25 requests remained unacceptable in relation to Climate Change.
- 7.172 In response to the FRR 002, the Applicant submitted on the 31st January 2021 a revised Non-technical Summary, Climate Change Memorandum, and internal daylight assessment. The Council's EIA Officer reviewed the submission and determined the ES is considered to be adequate. The subsequent ES submissions were not considered to be 'further information' under Regulation 25.
- 7.173 The Council's EIA Officer and the Council's Appointed EIA Consultants have confirmed that the submitted ES, including the subsequent ES submissions as set out above, meets the requirements of the EIA Regulations.
- 7.174 The 'environmental information' has been examined by the Council and has been taken into consideration by officers to reach a reasoned conclusion of the likely significant effects of the proposed development, which forms the basis of the assessment presented in this report. Appropriate mitigation / monitoring measures as proposed in the ES will be secured through planning conditions and/or planning obligations.

Energy & Environmental Sustainability

- 7.175 Development Plan Policies seek to ensure that new residential development should be zero carbon and non-residential developments should achieve a 45% carbon reduction target beyond Part L 2013 of the Building Regulations. Local Plan policy D.ES7 requires zero carbon emission development to be achieved through a minimum 45% reduction in regulated carbon dioxide emissions on-site, and the remaining regulated carbon dioxide emissions up to 100%, to be offset through a cash in lieu contribution. Policy SI2 of the London Plan requires major development to be net zero-carbon. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy.
- 7.2 Development Plan policies further require the use of sustainable design assessment tools to ensure that new development has maximised use of climate change mitigation measures. The current interpretation of this policy is to require non-residential development to achieve BREEAM 'Excellent' standards. The Local Plan further requires new non-residential development, greater than 500sqm, to meet at least BREEAM 'Excellent' standards.
- 7.3 The LBTH Sustainable Development team and the GLA Energy team have reviewed the submitted Energy Strategy, prepared by Cundall (May 2021). The scheme is proposing an air source heat pump solution (heating and hot water), which would be an electrical based system that could take advantage of the decarbonised National Grid in the future. The scheme proposes a 107kWp PV array to deliver on-site renewable energy generation.
- 7.4 The energy assessment (Silcock Dawson and Partners) supporting the application is generally supported and the use of low carbon electrical based solutions have the potential to take advantage of future grid decarbonisation. The proposals for the storage facility will be served by a heat pump solution and 100kWp photovoltaic array. The residential units are proposed to have a communal ASHP system, designed with future connection to district heating, and 23.4kWp photovoltaic array, and the other non-residential units have heat pumps proposed.
- 7.176 The total on-site CO₂ emission reduction is anticipated to be 73% against the building regulation baseline utilising the SAP10 carbon factors. The proposals are for an 859.4 tonnes/CO₂ reduction in on-site CO₂ emissions. This results in a carbon offsetting contribution of £924,255 to offset the remaining 324.3 tonnes CO₂ and achieve net zero carbon. This figure is based on the £95 per tonne rate as identified in the London Plan.

- 7.177 The proposals are considered to be in accordance with both local energy policy requirements for on-site carbon emission reductions and delivery of the carbon savings should be secured through submission of a post-completion report, including the as-built calculations. The carbon offsetting contribution should be secured through a s106 legal agreement (with payment on commencement of the scheme to enable the Council to initiate and deliver the offset projects for when the scheme is occupied), subject to approval, along with a commitment that the development will be designed to enable post-construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages.
- 7.178 In relation to sustainability, policy D.ES7 states 'All new non-residential development over 500 square metres floorspace (gross) are expected to meet or exceed BREEAM 'excellent' rating'. The sustainability statement indicates that the scheme will achieve this policy requirements however BREEAM pre-assessments should be submitted to demonstrate this is deliverable – these would be secured by condition, subject to planning approval.

Circular Economy

- 7.179 The application has been accompanied by a Circular Economy Statement in accordance with policy SI 7 of the London Plan with the aim of improving resource efficiency and innovation to keep products and materials at their highest use for as long as possible to promote a more circular economy. The proposed development has been assessed in regard to the following circular economy principles:
- Minimise the quantities of materials used
 - Minimise the quantities of other resources used
 - Specify and source materials and other resources responsibly and sustainably
 - Design for longevity, adaptability or flexibility and reusability or recoverability
 - Design out construction, demolition, excavation and municipal waste arising
 - Manage demolition waste
 - Manage excavation waste
 - Manage construction waste
 - Manage municipal waste (and industrial waste, if applicable)

- 7.180 The Circular Economy Statement has provided details of how the above areas have been addressed by the proposed development. The re-use and re-purposing of existing buildings is a core theme of the development. The GLA have assessed the Circular Economy Statement in their stage 1 referral response and are content with the current submission, prior to requesting further submissions via condition at GLA stage 2, subject to planning approval.

Whole Life Cycle Carbon

- 7.181 The application has been accompanied by a Whole Life Cycle Carbon Assessment Statement in accordance with policy SI 2 of the London Plan with the aim of reducing carbon emissions during the life cycle of a development. The proposed development has looked at the potential of UK/EU or UK/China construction materials sourcing against the GLA target benchmark carbon emissions and has also identified a number of carbon 'hotspots' within the development life cycle which should be scrutinised further to see if further reductions can be found:

- High cement replacement for building substructure
- Further optimisation of structural modification
- Structural steel has high recycled content
- Efficient façade system that reduces the amount of fixings needed
- Window frames contain high level recycled materials
- Low carbon internal finishing materials

7.182 The Whole Life Cycle Carbon Assessment Statement has provided details of the carbon performance of the proposed buildings. The re-use and re-purposing of existing buildings is a core theme of the development and the retention of the superstructure of the 1980's buildings is much welcomed from an embodied energy/circular economy agenda perspective. The GLA have assessed the Whole Life Cycle Carbon Assessment in their stage 1 referral response and are content with the current submission, prior to requesting further submissions via condition at GLA stage 2, subject to planning approval.

Air Quality

7.183 The application has had regard to the potential impact of the proposed development on air quality at nearby receptors and the impact of existing local air quality conditions on future occupiers. This has been assessed using local air quality monitoring sites. The impacts relating to dust were also considered as part of the assessment. The Local Plan identifies that the application site falls within an area of poor air quality with NO₂ Annual Mean concentration greater than 40 (µgm-3), and with the parts of the site around Mansell Street and East Smithfield suffering from NO₂ Annual Mean concentration greater than 60 (µgm-3).

7.184 The application is accompanied by an 'Environmental Statement', by Arup, June 2021, 276409-00, Final Draft 2 June 2021; Vol 1 Section5 Air Quality; Vol 2 Section5 Air Quality; Appendix E Air Quality. The application has had regard to the potential impact of the proposed development on air quality at nearby residential properties and the impact of existing local air quality conditions on future residents. This has been assessed using local air quality monitoring sites. The impacts relating to dust were also considered as part of the assessment.

7.185 The 'AQ Neutral; (Appendix E7) is satisfactory, as it provides the relevant Building Emission Benchmarks (BEBs) for both NO₂ and PM₁₀, it calculates the site's NO_x and PM₁₀ emissions from buildings, thus comparing them with the BEB(s). Furthermore, the 'Air Quality Neutral' provides the relevant transport emission benchmarks (TEBs) for both NO_x and PM₁₀, and it calculates the sites NO_x and PM₁₀ emissions from transport, thus comparing them with the TEBs. Both the BEBs and the TEBs are met, for both NO_x and PM₁₀, and the proposed development is air quality neutral. The air quality baseline is satisfactory for this non-residential proposed development, even if the area is characterised by high NO₂ concentration levels.

7.186 Subject to approval, conditions are required to secure submission of; Dust Management Plan and PM₁₀ monitoring, details of mechanical ventilation, details of kitchen extraction for relevant future commercial uses, details of construction plant and machinery.

Health

7.187 London Plan GG3 requires developments to assess their potential impacts on the mental and physical health and wellbeing of communities through the use of Health Impact Assessments (HIAs). Tower Hamlets Local Plan D.SG3 requires major developments referable to the GLA to provide an HIA.

- 7.188 An HIA document has been submitted. The HIA has assessed the proposed development under a number of sub-headings including 'Delivering Healthy Layouts,' Promoting Neighbourhood Cohesion,' 'Enabling Active Living' and 'Creating the Healthiest Environment.'
- 7.189 A number of mitigation measures have been identified to mitigate potential negative health impacts during construction and operational phases of the development. These assessments have been addressed comprehensively elsewhere within the scope of the determination of the application and, where necessary, mitigation secured by conditions or s106 legal agreement, subject to planning consent being granted.

Biodiversity

- 7.190 Development Plan policies seek to safeguard and provide for net gains for biodiversity. The application site consists of buildings and associated landscaping. None of the existing buildings on the application site have potential for bat roosts. Two mature plane trees in the west of the site have low potential for bat roosts but are to be retained in the development. There are, therefore, no significant protected species issues. The existing ornamental vegetation provides some habitat for common birds and invertebrates. The loss of some of this vegetation would be a minor adverse impact on biodiversity.
- 7.191 Policy D.ES3 requires major developments to deliver net gains in biodiversity that contribute to the Local Biodiversity Action Plan (LBAP). The proposals include biodiverse roofs – these will contribute to a LBAP target to create new open mosaic habitat. The proposed ornamental planting within a number of landscaped green spaces around the site includes a reasonable diversity of nectar-rich shrubs, trees and perennials, which will contribute to a LBAP objective to increase forage for bees and other pollinators. Proposed nest boxes for house sparrows and black redstarts, bat boxes and invertebrate habitat piles will all contribute to further LBAP objectives. A proposed water feature in the central courtyard could be a valuable wildlife habitat if it includes native marginal, floating and submerged plants. Overall, the proposals will clearly provide the net gain in biodiversity required by policy D.ES3.
- 7.192 Biodiversity enhancements should be secured through a condition, subject to planning approval, to provide biodiverse roofs and landscaping to include a good diversity of nectar-rich plants to provide food for bumblebees and other pollinators for as much of the year as possible, trees, bat boxes and nest boxes for appropriate bird species, including house sparrow, and vertical planting. The agreed measures shall be implemented in full prior to the occupation of the development hereby approved.
- 7.193 London Plan policy G5 states that predominantly commercial developments should meet the Urban Greening Factor target score of 0.3 in regard to the quality and proportion of urban greening proposed. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.26. Final re-calculation of the UGF would be secured by condition with a view to maximising urban greening and achieving the recommended 0.3 score through detailed design evolution.

Arboriculture

- 7.194 Development Plan policies support the protection and increasing provision of trees. As set out in the Arboricultural Impact Assessment, the proposal would involve the removal of 9 trees (including 4 x Category C (Low quality) and 2 x Category B (Moderate quality) trees), comprising 5 trees to directly facilitate the proposed development and a further 4 to enable the implementation of an enhanced landscaping scheme that includes 28 new trees to be planted. The proposal includes pruning of 4 trees to improve their relationship with buildings and improve security, including the 2 feature Category A (High quality) trees in the front forecourt.
- 7.195 Full details would be provided on new trees that would be secured by means of planning condition and would include the planting of semi-mature trees in line with BS 3936. The trees

would ideally be native to the UK and of a suitable size, shape and form to allow them to reach their intended proportions without significant or regular pruning. It is understood that some Chinese planting is proposed and this would be assessed accordingly at condition submission stage, subject to planning approval. Submission of a tree planting methodology in line with BS 8545 is also required and should describe a process for planting and maintaining young trees that will result in them successfully establishing in the landscape. The proposed facilitation pruning is minimal and would have little to no amenity impact. The proposed pruning would also constitute good arboricultural practice and would be appropriate irrespective of the development.

7.196 Following receipt of clarifications and amendments, the tree planting proposal and tree protection measure are concluded to be acceptable. Full details of appropriate locations, sizes and types of trees, and protection of existing trees around the site, along with an arboricultural management strategy would be secured by condition, subject to planning approval.

Flood Risk & Drainage

7.197 Development Plan policies seek to manage flood risk, encourage the use of Sustainable Urban Drainage Systems (SuDS) and sets out that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. The application site is located within Flood Zone 1 and therefore has no significant risk of tidal or fluvial flooding. There are surface and ground water flooding risks associated within the wider catchment area.

7.198 The drainage strategy sets out proposals to limit surface water discharge in line with the site's greenfield run off rate and sets a discharge rate of 10.15l/s for the whole site (2.11ha) in a 1 in 100year 40% storm event thus, providing a 62.14% betterment from the existing site discharge rate of 373l/s. The site will be split into 3 drainage catchment areas, all draining separately. These will consist of 2 outfall connections with flow control devices that will discharge to the local combined sewer at each location and 1 outfall that will discharge to on-site storage via tree pits and rain gardens. (Catchment West: 1.05ha and will discharge at 5.23l/s, East: 1.01ha and will discharge at 4.92l/s both discharging to combined sewers and catchment South: 0.028ha will discharge to tree pits and onsite storage).

7.199 The drainage strategy and the proposed discharge rate is accepted in principle and would go towards reducing the demand on the drainage network within this location, providing extensive betterment over the existing situation. The applicant proposes to provide and utilise a variety of on-site SuDs features throughout the development. The SuDs features will include attenuation tanks, an extensive blue roof storage system, permeable paving, rain gardens, tree pits, geo-cellular storage, and oversized drainage pipes, thus, meeting the SuDs requirements and providing biodiversity for the site. As a result, the site will be able to achieve on site storage attenuation of approximately 1,465m³, and this is required to safely reduce the peak discharge from 373l/s to 10.15l/s for a 100 year +40% climate change storm event without causing significant flooding risk on and off site.

7.200 Residual risk safe and appropriate flow routes from blockage and exceedance of the drainage system must be evaluated – this must demonstrate no property flooding or increase in flood risk, either offsite or to third parties. The applicant has submitted a typical maintenance regime for the drainage scheme. It is important to confirm details of agreed adoption, monitoring and maintenance of the drainage and suds features.

7.201 The application is supported subject to a condition to require submission of a final detailed surface water drainage scheme. Thames Water have also advised that, in regard to wastewater there would be adequate foul water and surface water network infrastructure capacity but in regard to water, there would be an inability of the existing water network infrastructure to

accommodate the needs of this development proposal. Thames Water have requested a pre-commencement condition to ensure submission of a water network upgrades/ development and infrastructure phasing plan, subject to planning approval.

Land Contamination

- 7.202 The application has been reviewed by the Council's Environmental Health Land Contamination Officer and subject to standard conditions, the proposals are considered to be acceptable. Any contamination that is identified can be addressed within the condition discharge process and will ensure that the land is made safe prior to any construction or demolition work takes place.

INFRASTRUCTURE

- 7.203 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of approximately £5,201,913.17 (subject to indexation) and Mayor of London CIL of approximately £9,740,188.33 (subject to indexation). These figures are indicative only and have been estimated using the most up to date available information provided by the developer on floorspace and current indexation values. This estimate is also subject to a full in-depth assessment following the grant of planning permission as required by the CIL Regulations.
- 7.204 The CIL Regulations 2010 (as amended) allow CIL to be used to fund a wide range of infrastructure, including transport, flood defences, schools, hospitals, and other health and social care facilities. The levy can be used to fund a very broad range of facilities such as play areas, open spaces, parks and green spaces, cultural and sports facilities, healthcare facilities, academies and free schools, district heating schemes and police stations and other community safety facilities. This flexibility gives local areas the opportunity to choose what infrastructure they need to deliver their relevant plan (the Development Plan and the London Plan in London).
- 7.205 Alongside CIL, Development Plan Policies seek financial contributions to be secured by way of planning obligations to offset the likely impacts of the proposed development on local services and infrastructure. These financial and non-financial planning obligations are expected to be secured by S106 legal agreement. The requested planning obligations have been assessed by officers to be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development

HUMAN RIGHTS & EQUALITIES

- 7.206 In considering this application, the Council has had due regard to the public sector equality duty created by s149 of the Equalities Act 2010 and the provisions of the Humans Rights Act 1998.
- 7.207 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD, as listed in the 'Recommendation' section below.
- 7.208 The proposed development on the application site does not have any significant human rights or equalities implications for what has been proposed in planning terms having regard to all relevant material considerations.
- 7.209 The applicant has provided a Social Cohesion Approach document (by Kanda) to describe how the proposed development would be in accordance with the Tower Hamlets Plan 2018-2023 which is a key Council document with the objective of tackling inequality by building a strong, inclusive and fair borough. The submitted Social Cohesion Approach details how physical

improvements, the Heritage Interpretation Centre, cultural sharing and education and links with the Chinese business community in Britain can benefit the borough.

7.210 Overall, the proposed development provides a series of benefits in this regard, including public realm improvements, employment opportunities and access to heritage interpretation. Officers are satisfied that the proposed development would not result in adverse impacts upon equality or social cohesion.

7.211 A number of objections have been received from members of the public in regard to wider human rights and equalities issues. These have been noted but are not material planning considerations to the proposed development of an embassy use at the application site, which would not be a personal permission for any particular nation.

8. RECOMMENDATION

8.1 Prior to reaching a decision on this application, the Committee needs to be appraised that if permission is granted, it will be subject to planning obligations and conditions. However, whilst it appears that enforcement action may be taken in the event of any non-compliance, were the application site to become an embassy, the State Immunity Act 1978 makes it unlikely that such enforcement action will be successful on its own. In such circumstances, diplomatic pressure from central government may be the appropriate remedy. This issue however is not a reason for refusal and the position is the same for any diplomatic mission in the UK.

Planning Permission (PA/21/01327)

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

8.3 Financial planning obligations

- a. £209,330 towards construction phase employment skills training
- b. £604,267 towards end-user phase employment skills training
- c. £924,318 toward carbon emission off-setting
- d. £200,000 towards an urban realm study of the Tower Hill/ East Smithfield/ St Katharine's Way/ Mansell Street junction with a focus on future local public realm and pedestrian connectivity improvements with any remainder to be spent on such identified improvements
- e. £75,000 towards improvements to Royal Mint Green
- f. £223,853 towards Council-managed CCTV review and implementation to ensure coverage of vulnerable/ blind spots
- g. £52,332.60 towards local development integration and co-ordination
- h. £53,891 towards planning obligation monitoring (this figure is liable to be recalculated once the s106 agreement is drafted in case of changes to the Heads of Terms. The final monitoring fee will be calculated in accordance with the Planning Obligations SPD (2021))

8.4 Other planning obligations:

- a. Economic incentives

- Access to employment
 - 20% local procurement
 - 20% local labour in construction
 - 26 x construction phase apprenticeships
 - 6 x end-user phase apprenticeship

b. Transport matters:

- Highways improvement works including ATZ improvements (S278 legal agreement)
- Travel Plan
- Events Management Plan to manage highways impacts of events and protests around the site including regular liaison and review with TfL and the Metropolitan Police

c. Energy and Sustainability matters:

- Energy Be Seen energy monitoring commitment
- Maximisation of on-site savings from renewables,
- Future proofing for district heating networks

d. Archaeology Conservation Management Plan to demonstrate how archaeological ruins (below and above ground) would be conserved on the site

e. Archaeological and Heritage Outreach & Interpretation Strategy which would provide the framework for presentation of historic material within and outside the site (including provisions for a steering group (involving members drawn from London wide and national wide heritage bodies e.g. Historic England, GLAAS, GLA Culture Unit, Museum of London, Royal Mint Archives, LAMAS, potentially Historic Royal Palaces and City of London) to help shape the finer details, exploration of off-site display opportunities, access for specialist archaeological groups by appointment and public access via the Open House annual public touring scheme)

f. Review of local refuse bins and street lighting (to integrate with CCTV) and possible replacement for security purposes (in consultation with TfL and Metropolitan Police)

g. Architect retention and Design certification

h. Compliance with Considerate Constructors Scheme

8.5 That the Corporate Director of Place is delegated the power to negotiate the legal agreement. If within three months of the resolution the legal agreement has not been completed, the Corporate Director for Place is delegated power to refuse planning permission.

8.6 That the Corporate Director of Place is delegated the power to impose conditions and informatives to address the following matters:

Planning Conditions

8.7 Compliance

1. 3 years deadline for commencement of development
2. Development in accordance with approved plans.
3. Restrictions on demolition and construction activities:
4. Removal of permitted development rights for erection of fences/boundary treatment following completion
5. Vegetation removal and nesting birds protection
6. Piling method statement

7. Energy and sustainability
8. Noise standards for mechanical plant and equipment
9. Energy and efficiency standards
10. Air quality emission standards for boilers & CHP
11. Non-road mobile machinery emissions
12. Tree protection measures
13. No additional plant, water tanks, air units or other substantive on roof not on plans
14. No additional pipes on building faces
15. Ancillary residential units to remain wholly ancillary and integral to embassy operation
16. Visitor accommodation limited to 29 units and only for visitors to the embassy

Pre-commencement

The inclusion of the following pre-commencement conditions has been agreed in principle with the applicants, subject to detailed wording:

17. Construction Environmental Management Plan and Construction Logistics Plan
18. Water infrastructure network upgrades including development and infrastructure phasing plan
19. Dust Management Plan and PM10 monitoring
20. Land Contamination Remediation Scheme, including (subject to post completion verification)
21. Written Scheme of Investigation (WSI) (Archaeology)
22. Fire strategy
23. Potable water and wastewater network upgrades
24. Air quality – mechanical ventilation
25. Digital connectivity
26. Circular Economy

Pre-superstructure works

27. Details of external facing materials and architectural detailing
28. Details of hard and soft landscaping of all public realm and open spaces (including details relating to play equipment, street furniture, wind mitigation measures, sensitive light strategy, air pollution reducing plants, communal gardening, 0.3 Urban Greening Factor)
29. Details of external facing servicing doors
30. Details of all mechanical plant
31. Biodiversity mitigation and enhancement strategy
32. Sustainable urban drainage strategy
33. Details of arials – removal of PD rights
34. Overheating strategy
35. Car Parking Management Plan (including details of residential and non-residential disabled persons car parking spaces, safe access routes and ECVPs)
36. Cycle Parking Management Plan
37. Detailed design of the servicing accesses

38. Deliveries and Servicing Plan
39. Site Waste Management Plan
40. Noise impact assessment and mitigation

Prior to occupation

41. Details of proposed tree planting
42. Light pollution controls for non-residential areas
43. Details of kitchen extraction for commercial units and flue emissions
44. Privacy Screening Measures
45. Improvement to security of St Mary Grace's Court accesses
46. Security details in relation to site boundaries (in consultation with the Metropolitan Police)

Post-occupation

47. Submission of a post-construction assessment to report on the development's actual Whole Life Carbon emissions

Informatives

1. Permission subject to legal agreement
2. Development is CIL liable
3. Thames Water – proximity to assets

Listed Building Consent (PA/21/01349)

Listed Building Consent Conditions

- 8.8 That conditional listed building consent is GRANTED subject to the following listed building consent conditions:
1. 3 years deadline for commencement of development
 2. Listed structures method statement
 3. Written specification and timeline for programme of building recording works to listed buildings
 4. Detailed plans showing any historic elements that will be lost and where new, traditional style details and materials will replace existing features to listed buildings
 5. Details of windows, doors, reinstatements, louvres, roof, dormers, chimneys, traditional cornices and features, fireplaces, alcoves, coffered ceilings, timber panelling, balustrades, skylights, exposed traditional roof trusses, material transitions, chamfered walls to listed buildings

APPENDIX 1

Drawings

Proposed Demolition Plans

1510_A_B1-_PD1_09, 1510_A_B1-_PD1_10, 1510_A_B1-_PD1_11, 1510_A_B1-_PD1_12, 1510_A_B1-_PD1_13, 1510_A_B1-_PD1_14, 1510_A_B1-_PD6_10, 1510_A_B1-_PD6_11, 1510_A_B1-_PD7_10, 1510_A_B1-_PD7_11, 1510_A_B2-_PD1_09, 1510_A_B2-_PD1_10, 1510_A_B2-_PD1_11, 1510_A_B2-_PD1_12, 1510_A_B2-_PD1_13 Rev2, 1510_A_B2-_PD1_14 Rev2, 1510_A_B2-_PD1_15, 1510_A_B2-_PD6_10, 1510_A_B2-_PD6_11, 1510_A_B2-_PD6_12, 1510_A_B2-_PD7_10, 1510_A_B2-_PD7_11, 1510_A_B2-_PD7_12, 1510_A_B3AB_D1_08, 1510_A_B3AB_D1_09, 1510_A_B3AB_D1_10, 1510_A_B3AB_D1_11, 1510_A_B3AB_D1_12, 1510_A_B3AB_D1_13, 1510_A_B3AB_D1_14, 1510_A_B3AB_D1_15, 1510_A_B3AB_D1_16, 1510_A_B3AB_D1_17, 1510_A_B3AB_D1_18, 1510_A_B3AB_D1_19, 1510_A_B3AB_D1_20, 1510_A_B3AB_D1_21, 1510_A_B3AB_D1_22, 1510_A_B3AB_D1_23, 1510_A_B3AB_D1_24, 1510_A_B3AB_D1_25, 1510_A_B3AB_D1_26, 1510_A_B3AB_D1_27, 1510_A_B3ab_D6_10, 1510_A_B3ab_D6_11, 1510_A_B3ab_D6_12, 1510_A_B3ab_D6_13, 1510_A_B3ab_D7_10, 1510_A_B3ab_D7_11, 1510_A_B3ab_D7_12, 1510_A_B3ab_D7_13, 1510_A_B3ab_D7_14, 1510_A_B3ab_D7_15, 1510_A_B3ab_D7_16, 1510_A_B3ab_D7_17, 1510_A_B4-_D1_09, 1510_A_B4-_D1_10, 1510_A_B4-_D1_21, 1510_A_B4-_D7_10, 1510_A_B4-_D7_18, 1510_A_B4-_D7_19, 1510_A_B4-_D7_20, 1510_A_B4-_D7_21, 1510_A_B4-_D7_22, 1510_A_B4-_PD7_22, 1510_A_B4-_PD7_23

Proposed Works Plans

1510_A_B4-_P17_24, 1510_A_B4-_PD1_22, 1510_A_B4-_PD7_24, 1510_A_B4-_PD7_25 Rev02

Proposed Plans

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Documents

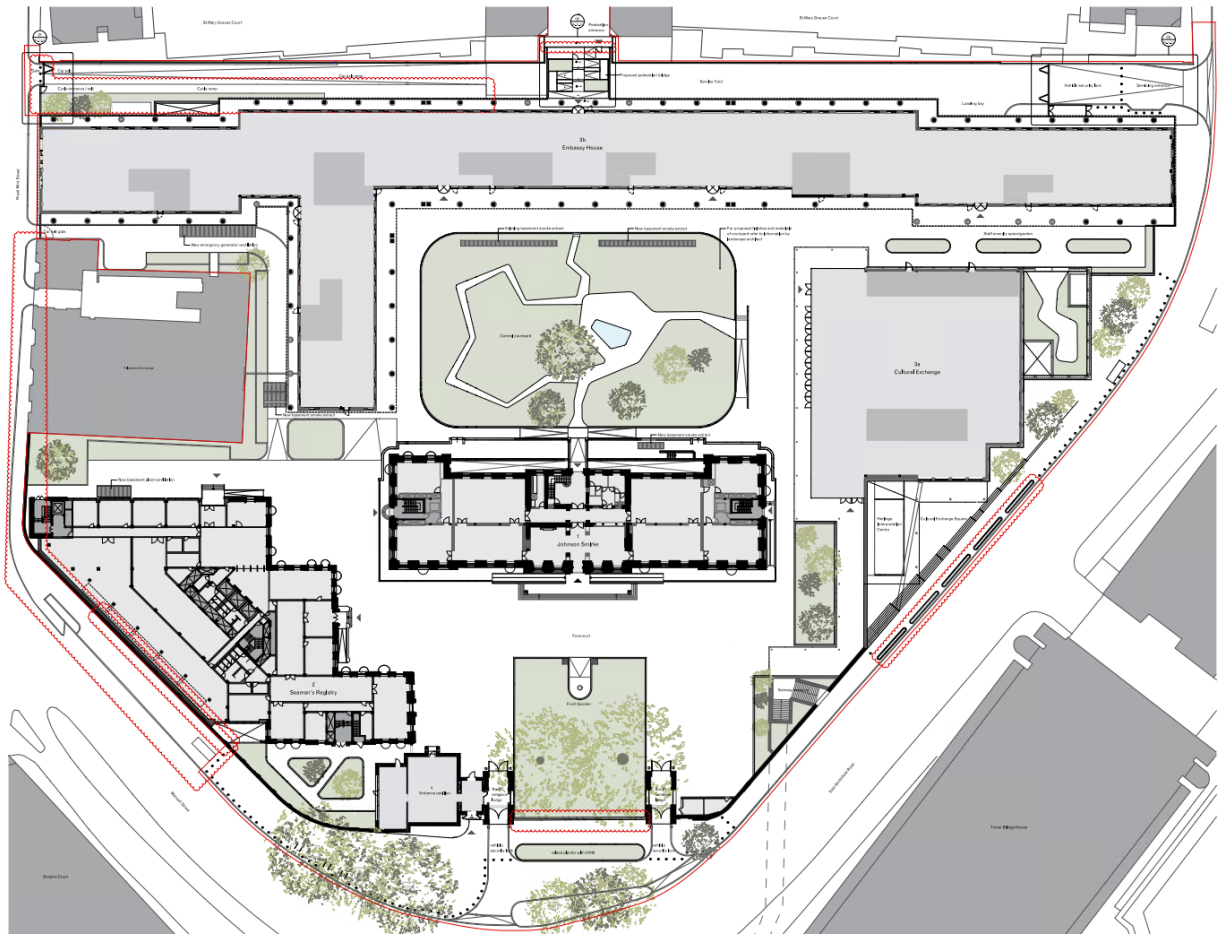
- Design and Access Statement, dated May 2021
- Landscaping Statement, dated May 2021
- Planning Statement, June 2021
- Environmental Statement, June 2021
- Environmental Statement – Memorandum (ES Climate Change Chapter), January 2022
- Daylight and Sunlight Report, May 2021
- Solar Glare Letter, January 2022
- Internal Daylight Adequacy Report, January 2022
- Sun on Ground Assessment, February 2022
- Energy Statement, May 2021
- Sustainability Overview, May 2021
- Sustainability Overview - Memorandum (BREEAM), January 2022
- Whole Life Carbon Assessment Statement, May 2021
- Circular Economy Statement, May 2021
- Statement of Community Involvement, May 2021
- Heritage Statement, May 2021
- Arboricultural Impact Assessment, June 2021
- Flood Risk and Drainage Assessment, October 2021
- Transport Assessment, May 2021
- Transport Assessment Addendum, October 2022
- Pedestrian Comfort Level Assessment, February 2022
- Vehicular Access for Events, February 2022
- Outline Construction Logistics Plan, May 2021
- Draft Construction Environmental Management Plan, June 2021
- Desk Based Archaeological Impact Assessment, May 2021
- Archaeological and Heritage Outreach & Interpretation Strategy (AOIS), August 2022
- Health Impact Assessment, June 2021
- Fire Safety Summary Statement, May 2021
- Biodiversity Net Gain Assessment Report, November 2021
- Social and Economic Benefits Statement, October 2022
- Material Samples

APPENDIX 2

Selection of plans and images



Appendix 2.1: Proposed landscape masterplan



Appendix 2.2: Proposed site-wide ground floor



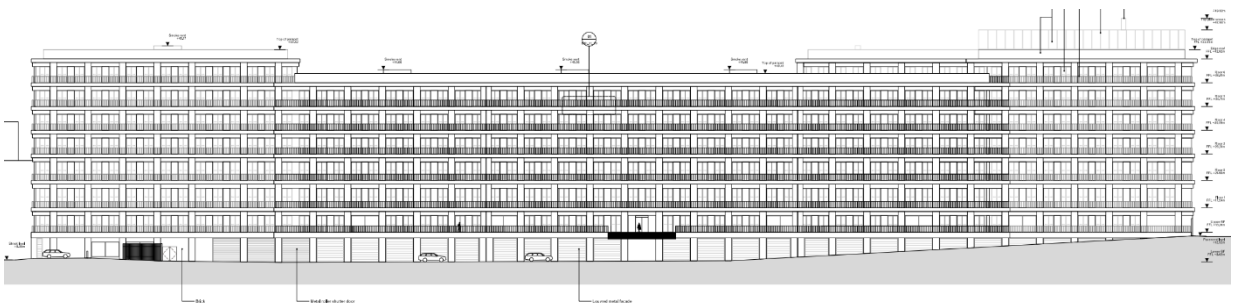
Appendix 2.3: Proposed site-wide west elevation



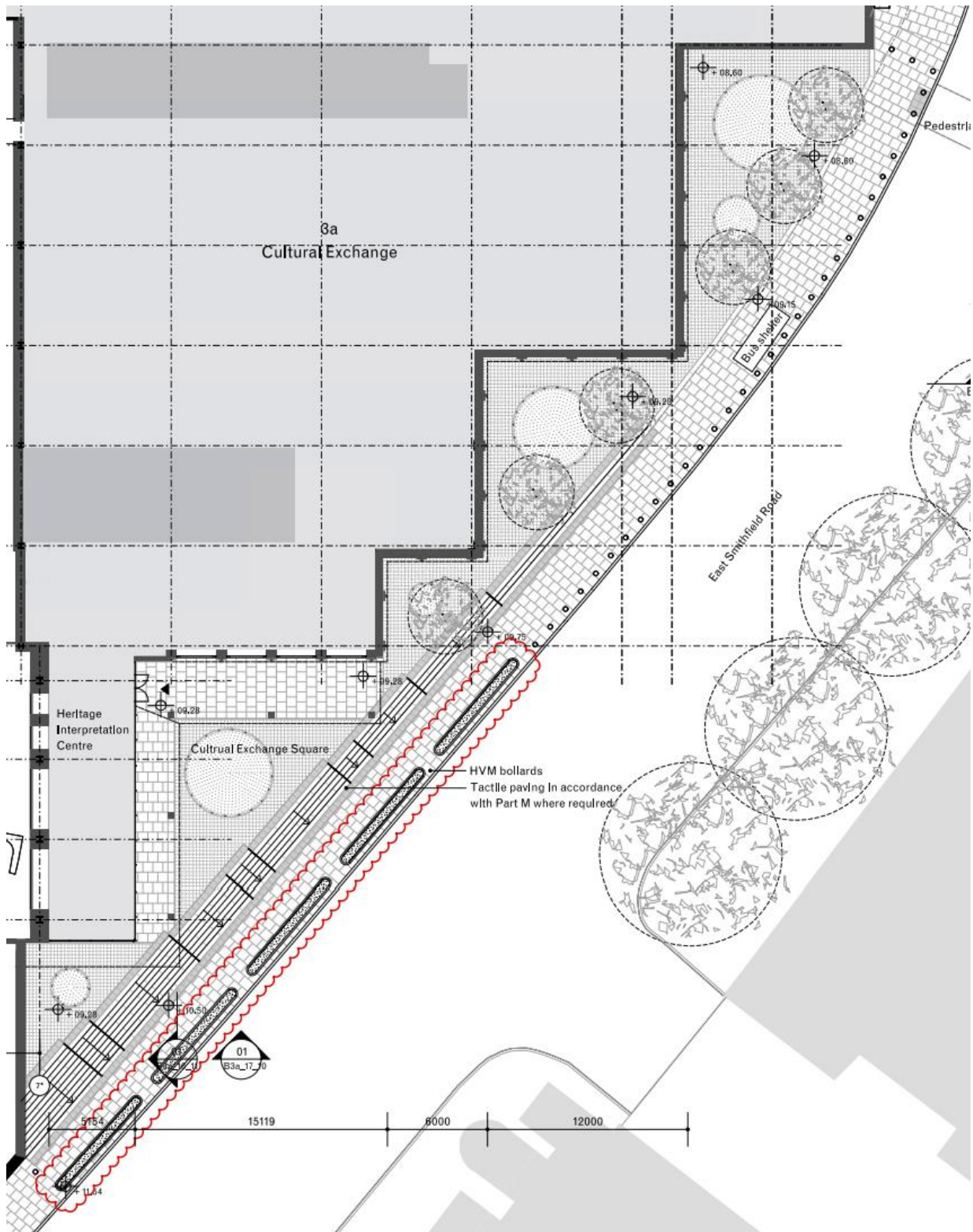
Appendix 2.4: Proposed site-wide north elevation



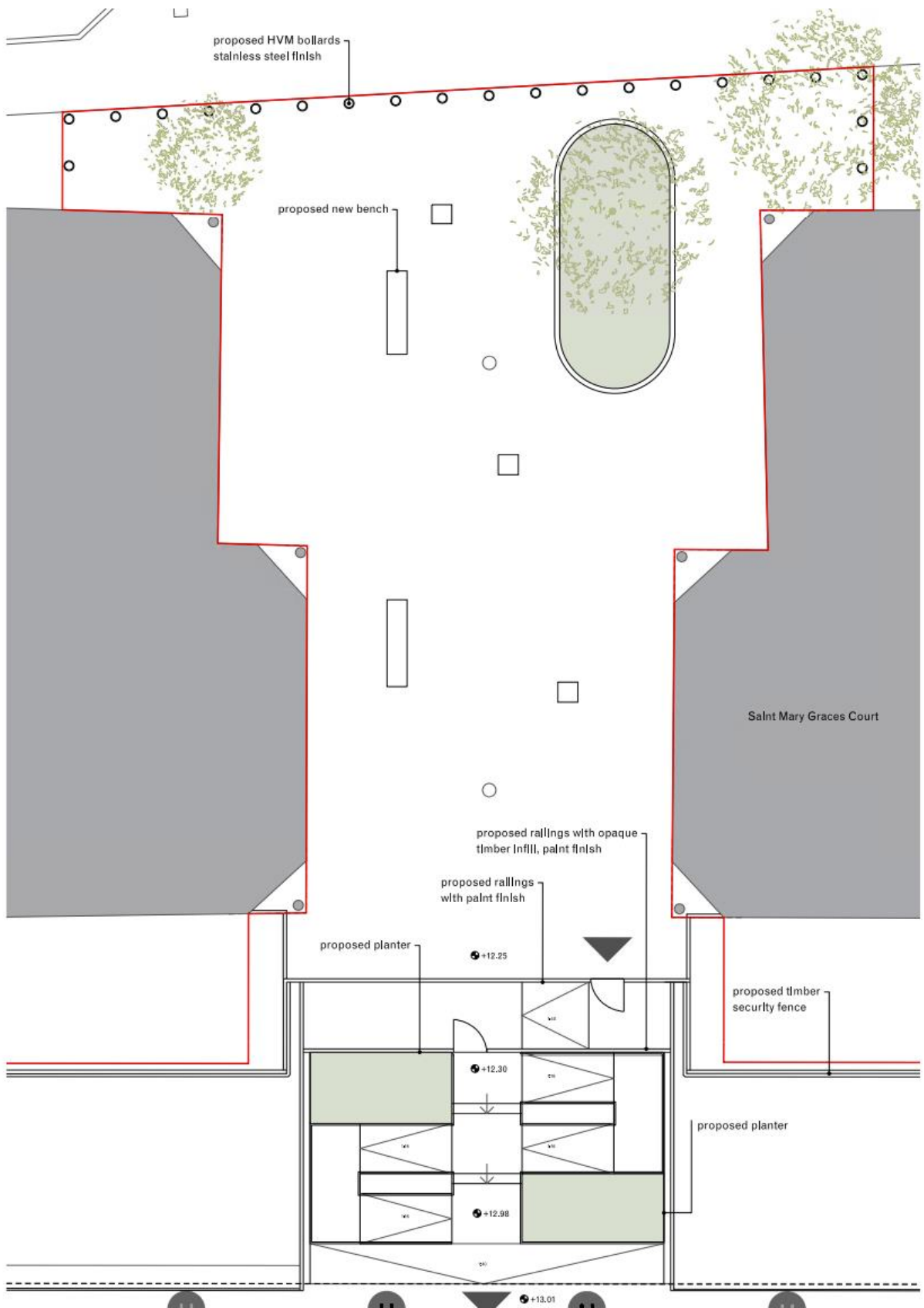
Appendix 2.5: Proposed site-wide south elevation



Appendix 2.6: Proposed site-wide east elevation



Appendix 2.7: Proposed public realm to East Smithfield



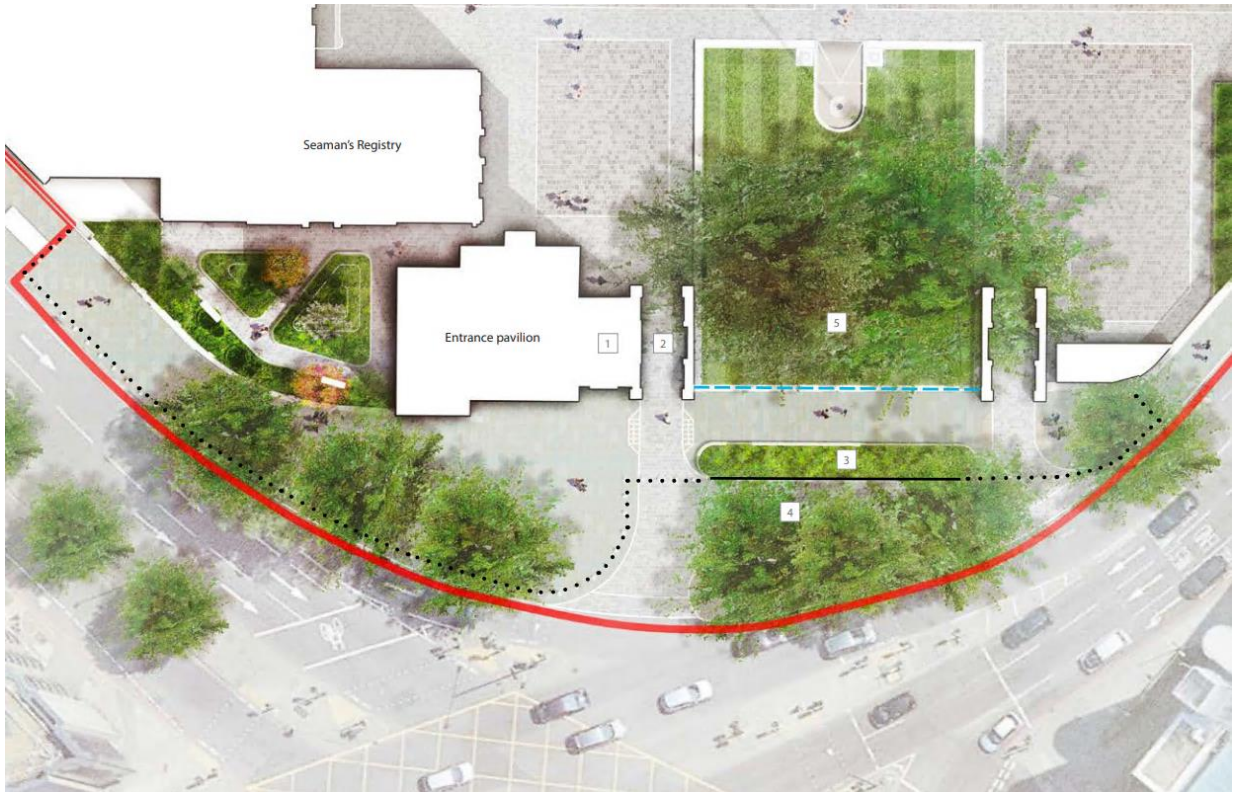
Appendix 2.8: Proposed public realm fronting Cartwright Street



Appendix 2.9: Image of proposed public realm to East Smithfield



Appendix 2.10: Proposed central courtyard garden



Appendix 2.11: Proposed public realm to site frontage