

APPLICATION BY CHINESE EMBASSY IN THE UK
ROYAL MINT COURT, LONDON, EC3N 4QN
APPLICATION REFS: PA/24/01229/A1 and PA/24/01248/NC

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Ministry of Housing,
Communities &
Local Government

Nona Jones, DP9
Home Secretary
Foreign Secretary

Our Ref: APP/E5900/V/24/3353754 &
APP/E5900/V/24/3353755

Sent by email only

6 August 2025

Dear Nona Jones, Home Secretary and Foreign Secretary

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
APPLICATION MADE BY CHINESE EMBASSY IN THE UK
LAND AT ROYAL MINT COURT, LONDON EC3N 4QN
APPLICATION REFS: PA/24/01229/A & PA/24/01248/NC**

1. The Secretary of State is considering the report of the Inspector, Claire Searson MSc PGDip BSc (Hons) MRTPI IHBC who held a public local inquiry from 11 February 2025 into the above planning application and application for listed building consent. A decision will be made on this application on or before 9 September 2025.
2. Consideration of this case is at an early stage, and no view has yet been formed. The Secretary of State seeks further information on the matters set out below to assist in reaching a decision on this case.
3. The Secretary of State makes reference in this letter to a number of inquiry documents. These are available on the Tower Hamlets website at <https://towerhamlets.app.box.com/s/68q9lv6thn0w29gt98y5godmes0rizmn>

Redacted drawings

4. It has come to the Secretary of State's attention that concerns have been raised about the fact that some drawings which are proposed to be secured via conditions are marked as being redacted. This matter was not raised at the inquiry, however, as it may be material to the decision, she is seeking further information on this matter.

5. The Secretary of State has noted that the Planning (Addendum 2) Drawing List dated 31 January 2025¹, identifies drawings which are said to be redacted. Some of those drawings are marked on their face as being 'redacted for security reasons', and it appears that this may refer, at least principally, to the internal physical arrangements of the Cultural Exchange Building and Embassy House, both of which have been 'greyed-out'. However, other plans which are identified as being redacted in the Drawing List are not marked on their face as such, and contain no obvious redactions. Furthermore, in some cases documents which were before the Inquiry show appear to show, indicatively at least, information which was redacted on the drawings (e.g. the internal physical arrangements of some of the buildings)
6. **Annex A** at the end of this letter sets out a list of the redacted drawings in column 1 (as detailed in the Drawing List) with links to the latest version of these drawings in column 2. Column 3 provides references and links to other documentation which was before the Inquiry which appears to show some of the redacted information.
7. The Secretary of State invites the applicant to:
 - a) identify precisely and comprehensively: (i) the plans which have been redacted; and (ii) describe the nature of those redactions;
 - b) explain the rationale and justification for each of the redactions; and
 - c) consider whether to provide unredacted versions of the drawings identified in column 1 of Annex A, particularly given the information already before the Inquiry.
8. The Secretary of State further invites all parties to address her on whether she can reach a lawful determination on (i) planning permission and (ii) listed building consent on the basis of the redacted plans. In particular, whether the redactions infringe the principle that a grant of planning permission and listed building consent – both of which are public documents – must make clear to all interested parties what has, and has not, been permitted.

Foreign, Commonwealth & Development Office (FCDO) and Home Office (HO) representation

9. The Secretary of State has noted the joint FCDO and HO representation of 14 January 2025.²
10. She invites the FCDO to provide an update on progress toward consolidation of accredited diplomatic premises.

¹ CD7.22 [1510 Planning \(addendum 2\) drawing list 20250130\(704775964.1\).pdf](#) | Powered by Box

² CD12.02 and CD12.02a

[CD 12.02 Letter from the Foreign Secretary and the Home Secretary \(14.01.2025\).pdf](#) | Powered by Box

[CD 12.02a Attached Plans, from the Foreign Secretary and the Home Secretary \(received 16.02.25\)](#)

[.docx](#) | Powered by Box

11. The Secretary of State further notes the HO request for a hard perimeter and the removal of unregulated public access to the pavilion and temporary exhibitions. The HO suggests that this could be achieved via a condition requiring the approval of amended designs. The proposed amendment is not supported by the applicant.³ No plans relating to this proposed design change and no suggested condition were put forward to the inquiry.
12. The Secretary of State is, in any event, inclined to agree with the submissions of the local planning authority (LPA)⁴ that the introduction of a hard perimeter would be a material amendment to the application that would require further consultation. She invites HO to address her further on this matter.
13. The Secretary of State also notes the applicant's submission⁵ that the matter can be dealt with via security screening within the Heritage Interpretation Centre (HIC), providing a permanent permission for the Metropolitan Police Service and emergency services to access the paved forecourt in front of the Cultural Exchange Building and the HIC, and for this to be addressed by way of a condition. No detailed proposals or proposed wording for a condition was before the inquiry, and the Secretary of State invites the applicant to address her further on its detailed proposals, any suggested condition, and whether the proposal for permanent consent for access is consistent with the inviolability of the premises of a mission (Article 22 of the Vienna Convention).

Letter and attachments from the Rt Hon Iain Duncan Smith MP to the Secretary of State

14. This post-inquiry representation dated 18 June 2025, enclosing a letter from the Metropolitan Police Services to the Rt Hon Iain Duncan Smith MP dated 10 April 2025, is attached for information.

Timescales

15. The Secretary of State considers that a period of 2 weeks to submit representations is reasonable in the circumstances of this case. You are therefore asked to submit any representations you wish to make by email to PCC@communities.gov.uk by Wednesday 20 August.
16. Please note that representations are invited on this issue to enable a fully informed decision to be taken, and this letter should not be read as any indication of what the final decision will be. Comments should be confined to any matters arising from the matters above, and should not seek to raise any other matters.
17. The Secretary of State will circulate any responses she receives as a result of the above invitation, and will give parties the opportunity to make any further comments arising from the responses. For ease of circulation and to fulfil the Department's obligations relating to the General Data Protection Regulation, please do not provide hand written signatures (or copies of) on any responses.

³ Paras 55-59, [INQ 28 - Applicant's Closing.docx | Powered by Box](#)

⁴ Paras 4.1-4.2 [INQ 27 - Council's Closing.docx | Powered by Box](#)

⁵ Paras 55-59, [INQ 28 - Applicant's Closing.docx | Powered by Box](#)

18. A copy of this letter is also being sent to the parties listed below. If these parties wish to submit comments in response to this letter and enclosures, they should do so within the timescale set out above. A single response should be provided from each party listed below; please do not provide responses from individual members of these organisations.

Yours faithfully

Planning Casework Unit

Authorised to consult with parties on behalf of the Secretary of State

Copied to

London Borough of Tower Hamlets
Royal Mint Court Resident's Association
Interparliamentary Alliance on China
Friends of St Katharine's Docks
Royal Mint Tenants and Residents Association
Hongkongers in Britain
Metropolitan Police Service

Annex A Table of redacted and indicative drawings

	COLUMN 1	COLUMN 2	COLUMN 3
	Drawing number from Planning (Addendum 2) Drawing List	Link to redacted drawings on inquiry website	Link to location of unredacted indicative drawings
1	B1_P11_09 Proposed basement floor plan, Johnson Smirke building	CD1.03C p2 CD 1.03C - Proposed Drawings.pdf Powered by Box	INQ11 p42 INQ 11 - Architect's Presentation.pdf Powered by Box
2	B1_P11_10 Proposed ground floor plan, Johnson Smirke building	CD1.03C p3 CD 1.03C - Proposed Drawings.pdf Powered by Box	Fig 6.10.4 p91 CD 11.03 Applicant PoE - Design.pdf Powered by Box INQ11 p41 INQ 11 - Architect's Presentation.pdf Powered by Box
3	B1_P11_11 Proposed first floor plan, Johnson Smirke building	CD1.03C p4 CD 1.03C - Proposed Drawings.pdf Powered by Box	Fig 6.10.3 p91 CD 11.03 Applicant PoE - Design.pdf Powered by Box INQ11 p42 INQ 11 -

			Architect's Presentation.pdf Powered by Box
4	B1_P11_12 Proposed second floor plan, Johnson Smirke building	CD1.03C p5 CD 1.03C - Proposed Drawings.pdf Powered by Box	INQ11 p43 INQ 11 - Architect's Presentation.pdf Powered by Box
5	B1_P11_13 Proposed third floor plan, Johnson Smirke building	CD1.03C p6 CD 1.03C - Proposed Drawings.pdf Powered by Box	INQ11 p43 INQ 11 - Architect's Presentation.pdf Powered by Box
6	B1_P11_14 Proposed roof plan, Johnson Smirke building	CD1.03C p7 CD 1.03C - Proposed Drawings.pdf Powered by Box	
7	B2_P11_09 Proposed basement floor plan, Seaman's Registry building	CD1.03C p18 CD 1.03C - Proposed Drawings.pdf Powered by Box	INQ11 p52 INQ 11 - Architect's Presentation.pdf Powered by Box
8	B2_P11_10 Proposed ground floor plan, Seaman's Registry building	CD1.03C p19 CD 1.03C - Proposed Drawings.pdf Powered by Box	Figure 6.11.4 p93 CD 11.03 Applicant PoE - Design.pdf Powered by Box INQ11 p53 INQ 11 - Architect's Presentation.pdf Powered by Box
9	B2_P11_11 Proposed first floor plan, Seaman's Registry building	CD1.03C p20 CD 1.03C - Proposed Drawings.pdf Powered by Box	Figure 6.11.3 p93 CD 11.03 Applicant PoE - Design.pdf Powered by Box
10	B2_P11_12 Proposed second floor plan, Seaman's Registry building	CD1.03C p21 CD 1.03C - Proposed Drawings.pdf Powered by Box	
11	B2_P11_13 Proposed third floor plan, Seaman's Registry building	CD1.03C p22 CD 1.03C - Proposed Drawings.pdf Powered by Box	
12	B2_P11_14 Proposed fourth floor plan, Seaman's Registry	CD1.03C p23 CD 1.03C - Proposed	

	building	Drawings.pdf Powered by Box	
13	B2_P11_15 Proposed roof floor plan, Seaman's Registry building	CD1.03C p24 CD 1.03C - Proposed Drawings.pdf Powered by Box	
14	B3a_11_09 Proposed basement plan, Cultural Exchange building	CD1.03C p37 CD 1.03C - Proposed Drawings.pdf Powered by Box	Figure 6.12.12 p99 CD 11.03 Applicant PoE - Design.pdf Powered by Box INQ11 p60 INQ 11 - Architect's Presentation.pdf Powered by Box
15	B3a_11_10 Proposed upper ground floor plan, Cultural Exchange building	CD1.03C p38 CD 1.03C - Proposed Drawings.pdf Powered by Box	Figure 6.12.14 p99 CD 11.03 Applicant PoE - Design.pdf Powered by Box INQ11 p61 INQ 11 - Architect's Presentation.pdf Powered by Box
16	B3a_11_11 Proposed first floor plan, Cultural Exchange building	CD1.03C p39 CD 1.03C - Proposed Drawings.pdf Powered by Box	INQ11 p62 INQ 11 - Architect's Presentation.pdf Powered by Box
17	B3a_11_12 Proposed second floor plan, Cultural Exchange building	CD1.03C p40 CD 1.03C - Proposed Drawings.pdf Powered by Box	INQ11 p63 INQ 11 - Architect's Presentation.pdf Powered by Box
18	B3a_11_13 Proposed third floor plan, Cultural Exchange building	CD1.03C p41 CD 1.03C - Proposed Drawings.pdf Powered by Box	INQ11 p63 INQ 11 - Architect's Presentation.pdf Powered by Box
19	B3a_11_14 Proposed fourth floor plan, Cultural Exchange building	CD1.03C p42 CD 1.03C - Proposed Drawings.pdf Powered by Box	INQ11 p64 INQ 11 - Architect's Presentation.pdf Powered by Box
20	B3a_11_15 Proposed fifth floor plan, Cultural Exchange building	CD1.03C p43 CD 1.03C - Proposed Drawings.pdf Powered by Box	INQ11 p64 INQ 11 - Architect's Presentation.pdf Powered by Box

21	B3a_11_16 Proposed sixth floor plan, Cultural Exchange building	CD1.03C p44 CD 1.03C - Proposed Drawings.pdf Powered by Box	
22	B3a_11_17 Proposed roof plan, Cultural Exchange building	CD1.03C p45 CD 1.03C - Proposed Drawings.pdf Powered by Box	
23	B3b_11_08 Proposed basement plan, Embassy House, North	CD7.05 1510 A B3b 11 08 01.pdf Powered by Box	
24	B3b_11_09 Proposed basement plan, Embassy House, North	CD7.05 1510 A B3b 11 09 01.pdf Powered by Box	
25	B3b_11_10 Proposed ground floor plan, Embassy House, North	CD7.05 1510 A B3b 11 10 01.pdf Powered by Box	Figure 6.13.6 p104 CD 11.03 Applicant PoE - Design.pdf Powered by Box INQ11 p78 INQ 11 - Architect's Presentation.pdf Powered by Box
26	B3b_11_11 Proposed ground floor plan, Embassy house, South	CD7.05 1510 A B3b 11 11 01.pdf Powered by Box	Figure 6.13.6 p104 CD 11.03 Applicant PoE - Design.pdf Powered by Box
27	B3b_11_12 Proposed first floor plan, Embassy House, North	CD7.05 1510 A B3b 11 12 01.pdf Powered by Box	
28	B3b_11_13 Proposed first floor plan, Embassy House, South	CD7.05 1510 A B3b 11 13 01.pdf Powered by Box	
29	B3b_11_14 Proposed second floor plan, Embassy House, North	CD7.05 1510 A B3b 11 14 01.pdf Powered by Box	
30	B3b_11_15 Proposed second floor plan, Embassy House, South	CD7.05 1510 A B3b 11 15 01.pdf Powered by Box	
31	B3b_11_16 Proposed third floor plan, Embassy House, North	CD7.05 1510 A B3b 11 16 01.pdf Powered by Box	

32	B3b_11_17 Proposed third floor plan, Embassy House, South (plan not found)	CD7.05 1510_A_B3b_11_17_01.pdf Powered by Box	
33	B3b_11_18 Proposed fourth floor plan, Embassy House, North	CD7.05 1510_A_B3b_11_18_01.pdf Powered by Box	
34	B3b_11_19 Proposed fourth floor plan, Embassy House, South	CD7.05 1510_A_B3b_11_19_01.pdf Powered by Box	
35	B3b_11_20 Proposed fifth floor plan, Embassy House, North	CD7.05 1510_A_B3b_11_20_01.pdf Powered by Box	
36	B3b_11_21 Proposed fifth floor plan, Embassy House, South	CD7.05 1510_A_B3b_11_21_01.pdf Powered by Box	
37	B3b_11_22 Proposed sixth floor plan, Embassy House, North	CD7.22 1510_A_B3b_11_22(704775955.1).pdf Powered by Box	Figure 6.13.8 p105 CD 11.03 Applicant PoE - Design.pdf Powered by Box INQ11 p80 INQ 11 - Architect's Presentation.pdf Powered by Box
38	B3b_11_23 Proposed sixth floor plan, Embassy House, South	CD7.22 1510_A_B3b_11_23(704775956.1).pdf Powered by Box	Figure 6.13.8 p105 CD 11.03 Applicant PoE - Design.pdf Powered by Box INQ11 p80 INQ 11 - Architect's Presentation.pdf Powered by Box
39	B3b_11_24 Proposed seventh floor plan, Embassy House, North	CD7.22 1510_A_B3b_11_24(704775957.1).pdf Powered by Box	
40	B3b_11_25 Proposed seventh floor plan, Embassy House, South	CD7.22 1510_A_B3b_11_25(704775958.1).pdf Powered by Box	
41	B3b_11_26 Proposed roof floor plan,	CD7.22 1510_A_B3b_11	Figure 6.13.7 p105 CD 11.03 Applicant PoE -

	Embassy House, North	26(704775959.1).pdf Powered by Box	Design.pdf Powered by Box INQ11 p80 INQ 11 - Architect's Presentation.pdf Powered by Box
42	B3b_11_27 Proposed roof floor plan, Embassy House, South	CD7.22 1510_A_B3b_11_27(704775960.1).pdf Powered by Box	Figure 6.13.7 p105 CD 11.03 Applicant PoE - Design.pdf Powered by Box INQ11 p80 INQ 11 - Architect's Presentation.pdf Powered by Box
43	B3b_21_11 Proposed unit flat layouts, Embassy House	CD7.22 1510_A_B3b_21_11_Unit_layouts(704775961.1).pdf Powered by Box	
44	B3b_21_12 Proposed unit flat layouts, Embassy House	CD7.22 1510_A_B3b_21_12_Unit_layouts(704775962.1).pdf Powered by Box	
45	B4_11_05 Location plan, Proposed scheme	CD1.03C p86 CD 1.03C - Proposed Drawings.pdf Powered by Box	
46	B4_11_08 Site plan, Proposed scheme	CD1.03C p87 CD 1.03C - Proposed Drawings.pdf Powered by Box	
47	B4_11_09 Proposed basement plan, Masterplan	CD7.05 1510_A_B4-11_09_01.pdf Powered by Box	
48	B4_11_10 Proposed ground floor plan, Masterplan	CD7.05 p89 1510_A_B4-11_10_01.pdf Powered by Box	
49	B4_11_11 Proposed roof plan, Masterplan	CD7.22 1510_A_B4-11_11(704775963.1).pdf Powered by Box	

		Powered by Box	
50	B4_11_12 Proposed paving plan, Masterplan	CD7.05 1510 A B4-11 12 01.pdf Powered by Box	
51	B4_11_19 Proposed works on Cartwright Street, Masterplan	CD1.03C p92 CD 1.03C - Proposed Drawings.pdf Powered by Box	
52	B4_P11_21 Proposed ground floor plan, Masterplan, Entrance pavilion	CD1.03C p107 CD 1.03C - Proposed Drawings.pdf Powered by Box	



HOUSE OF COMMONS
LONDON SW1A 0AA

The Rt Hon Angela Rayner MP
Deputy Prime Minister, and Secretary of State for Housing, Communities and Local Government
Department for Levelling Up, Housing & Communities
2 Marsham St
SW1P 4DF

Dear Angela,

18th June 2025

I write further to Ministerial contributions in parliament on the 9th and 12th June in the House of Commons and Lords respectively, clarifying that further representations on material planning matters relating to this application would be accepted by the Government. I am grateful for this opportunity, as there have been important developments since the conclusion of the Planning Inspector's Inquiry.

Some of my concerns fall out of the scope of the planning process. I detail below only the matters strictly relevant to your decision.

1. Insufficient space for protest

On 9th December 2024 Tower Hamlets Council refused the People's Republic of China's (PRC) embassy development application unanimously for the second time. One of the reasons given for refusal was the objection from the Metropolitan Police Service (MPS). At the same Council hearing the MPS claimed that "more than 100 protesters" outside the site will likely "spill on to the road and disrupt major material roads".

On 17th January 2025 Elisabeth Chapple of the MPS *Protect and Prepare* team formally notified the Planning Inspector that they had withdrawn their objection after Planning Officers sent them a 2022 *Pedestrian Comfort Assessment* commissioned by the Chinese Embassy claiming that nearly 4,000 protesters could be accommodated at the site, and 2,000 on the pavement outside the main entrance.

The PRC Pedestrian Comfort Assessment prompted the MPS to revise its position. In doing so, the MPS relied upon data from protests outside the existing Chinese embassy to argue that protests at Royal Mint Court would be unlikely to exceed a few hundred, and therefore could safely be accommodated at the site without disruption to adjacent arterial roads. This data did not consider larger protests against the behaviour of the Chinese Government which had not been held outside the existing embassy in Portland Place at the request of the MPS. Details of these (excluded) larger protests are at *Annex 1*.

Reacting to this news, civil society organisations decided to organise protests to show that they were willing to mobilise in greater numbers than projected by the MPS or the PRC.

On 8th February 2025 around 4,000 protesters gathered to protest at the site. For a period of time, Tower Bridge junction was entirely blocked, causing "serious disruption" in the words of the MPS. Two people were arrested. On 15th March over 5,000 people gathered. The MPS imposed restrictions on the protest. Through Freedom of Information requests, it has since been revealed that over £350,000 was spent policing these two protests. Since then, two further protests were held on 3rd May and 14th June, each attended by at least 1,500 people. Both were subject to MPS restrictions, with one further arrest.

MEMBER OF PARLIAMENT FOR CHINGFORD AND WOODFORD GREEN



On 10th April 2025, following a meeting with leading parliamentarians, Deputy Assistant Commissioner Jon Savell wrote to me stating:

“The MPS maintains concerns that assembly/protest of numbers greater than 500 will likely impede road surface transport.” (Annex 2)

I believe that the MPS was right to object to the application in December 2024. Four protests have taken place which have brought serious disruption to the local area and major arterial roads. Three of the four protests were subject to MPS restrictions. I know that the MPS does not impose restrictions on key civil liberties lightly. Yet it is now a routine occurrence with protests at Royal Mint Court. Such action would not be necessary if the space were sufficient to enable free protest. It is relevant to note here that the PRC application contains plans which will further restrict the already very limited pavement area outside Royal Mint Court. The Government should not permit an embassy development which cannot accommodate free protest and would necessitate prohibitive ongoing cost to the taxpayer.

2: Risk posed by potential access to cabling infrastructure

Setting aside the recent behaviour of the PRC regarding alleged cable cutting and recently confirmed infrastructure hacks on the United States (*Volt Typhoon and Salt Typhoon*), I believe it is material to this application that the site is reportedly proximate to sensitive communications cabling.

The iPaper, Mail, Sunday Times, and other national outlets have all reported on the proximity of sensitive cable to the site. The Government has not contradicted this claim. Since the iPaper broke the story earlier in the year, concern has been expressed by the White House, and the Dutch and Swiss Parliaments, worried that that infrastructure proximate to the site serves financial institutions and could be a risk to their own economies.

Responding to the concerns, Minister Peter Kyle said that the application was “*...in the planning process*” and concerns would “*assiduously*” be addressed. While reassuring in principle, it is important to emphasise that the PRC’s application has now been scrutinised by the Planning Inspector and submitted to the Secretary of State. It cannot be changed. The application Section 105 conditions agreed by Tower Hamlets Council and the PRC contain no plans to address the cabling issue. Any security risks relating to the cabling cannot be addressed as a part of this formal application.

The PRC’s application will stand and fall on the basis of the merits of the planning arguments before the Secretary of State. It would therefore be inappropriate to approve the application pending a plan to address such a serious matter.

3. Conditions requested by the UK Government refused by the PRC

In their letter to the Planning Inspector of 14th January 2025, the Foreign and Home Secretaries set out two conditions relating to this application: The first relates to the consolidation of Chinese consular premises in London in the Royal Mint site, and second requesting a hard perimeter to be built to enable access to historic ruins on the site.

This letter has been repeatedly cited in the House by the Foreign Secretary and Security Minister as a source of comfort for colleagues concerned about the development. This has been a cause for confusion among those of us concerned about the development. The Chinese side explicitly refused both of these conditions during the Planning Inquiry (*Annex 3*). Unless significant changes have been made to the application without public knowledge, there is no plan either to consolidate premises or to build a hard perimeter.



Though neither of these conditions touch upon concerns regarding interference, cabling infrastructure, resident concerns, or the safety of the site for protesters, it is noteworthy that the PRC rejected these proposals, and the letter therefore offers no comfort at all. The conditions of the UK Government have been refused, and the application should therefore be rejected.

4. Applicant agnosticism not appropriate, undermined by the applicant

Finally, the PRC representative has relied upon their application for an *embassy sui generis use class* development to disregard broader concerns that are specific to China. Yet there are arguments, both related to material planning and political matters which are relevant to the decision regarding this application. The Government itself has tacitly acknowledged these by calling in the application for having *more than local importance*. I believe that it is appropriate to consider broader matters related to the PRC and its behaviour in assessing this application.

Further, in their own arguments supporting the development, the PRC side makes broader points about the diplomatic and trade benefits which are likely to ensue if the application is successful. These arguments are clearly specific to China, and I believe they provide a reasonable basis for you to take into account concerns proper to the applicant. I know that many dissidents and civil society groups have written to you, and hope, therefore, that their points will be considered.

I hope the arguments contained in this letter are helpful as you prepare to make a determination.

Rt Hon Sir Iain Duncan Smith MP

Copied to: Planning Casework Unit: pcu@communities.gov.uk

Date	Protest	Location	Attendance (minimum approximate figure)
17th August 2019	Protest in solidarity with Hong Kong	From Trafalgar Square to Parliament Square There were clashes with Pro-Beijing crowd	1000
1 October 2020	Resist the CCP	Chinese Embassy	1200
9th January 2022	Human Chain Protest	Clarence Street Kingston	2000
12 June 2021	Hong Kong Rally commemorating 12 June 2019	Marble Arch, Trafalgar Square, and Parliament Square	3000
19th June 2021	Protest to Support Apple Daily and the Freedom of the Press in Hong Kong	Chinese Embassy London ** The protest was moved by the Police when it started to the other side of the road	1500
1st July 2021	Protest "Hongkongers solidarity against the CCP"	HKETO	100
31st August 2021	Commemorating 31st August 2019	Piccadilly Circus	500
1 October 2021	Protest against the CCP on national day	Piccadilly Circus	1000
24 October 2021	Say no to the Genocide Game	Tragalgar Square	500
10th December 2021	International Human Rights Day Protest	Chinese Embassy	100
19th December 2021	UK "Refuse to recognise the HK election" protest	HKETO	400
15th Jan 2022	Freedom of the Press Protest	From Piccadilly Circus to HKETO	1000
3rd February 2022	Alternative Olympic Opening Ceremony	Piccadilly Circus	500

4th June 2022	Unite for Democracy Joint Rally	Kingston fair field park	1500
4th June 2022	June Fourth Commemoration	Trafalgar Square and Chinese Embassy A paper-made tank model was stopped by the police from being put on the road	1000
12th June 2022	Be Water Be United Protest	Parliament Square	4000
1st October 2022	Resist the CCP Protest	From Piccadilly Circus Marching to the Chinese Embassy	700
23rd October 2022	Protest against the assault against Bob Chen in Manchester	From Downing Street towards the Chinese Embassy	500
15 April 2023	Protest in solidarity with the HK 47	High Street Sutton	200
24 April 2023	Protest in Solidarity with the HK 47	From National Theatre to Parliament Square	300
5th June 2023	June Fourth Commemoration	Trafalgar Square and Kingston Fairfield park	1400/1200
11 June 2023	Commemorating 12th June	Parliament Square	1000
1st July 2023	Protest against the HK Handover	Multiple cities HKETO	200
3rd October 2023	Protest on PRC National day	Chinese Embassy	500
26 November 2023	Protest in Solidarity with the HK 47	Chinese Embassy	100
15 Feb 2024	HKETO New Year Protest	HKETO Attendees of the HKETO Reception had quarrels with protestors	100
23 March 2024	Protest against Article 23	From FCDO to HKETO	250
24 April 2024	Protest in solidarity with the 47	Parliament Square	300
14 May 2024	HKETO Protest	HKETO	100

4th June 2024	Commemorating June Fourth	Chinese Embassy Kingston Fair Field Park	800 700
12 June 2024	Commemorating 12 June 2019	Parliament Square	700
1st July 2024	Mourning for Mr. Leung Kin-fai	HKETO	100
31 August 2024	Commemorating 31st August 2019	Trafalgar Square to HKETO	800
2nd October 2024	Protest against HKETO	Outside of Rosewood Hotel	100
1st October 2024	Protest against CCP	Royal Mint Court	300
16th November 2024	Ukraine-HK Joint Protest	St Peter's Square Menchester	700
20th December 2024	Human Rights Day Protest	Chinese Embassy	150



FAO:
Rt. Hon. Sir Iain Duncan Smith MP

Deputy Assistant Commissioner
Specialist Operations
Jon Savell
New Scotland Yard
Victoria Embankment
London
SW1A 2JL

RE: Royal Mint Court, E1

10th April 2025

Dear Sir Iain,

Thank you for taking the time to attend New Scotland Yard on Wednesday 2nd April to discuss the proposed planning for a new Chinese Embassy at Royal Mint Court and to set out again the MPS's publically articulated position.

I write to recap the points we covered in the meeting. Firstly, for further detail I refer you to the evidence given by myself and colleagues at the Planning Inquiry meeting on 13th February.

The verbal objection by the MPS at the Tower Hamlets Council Planning meeting was based on concerns held by the MPS at the time in relation to its initial assessment of the potential policing impact of the proposed development. Ultimately, decisions on the suitability of the planning application, and the extent any input from the MPS should be a material consideration, are a matter for the Planning Inspector. The MPS remains impartial to the proposed development outside of any implications on policing.

Between the Tower Hamlets Council Planning meeting and the Public Inquiry, the MPS was able to undertake a detailed specialist assessment of the number of people who could assemble for the purposes of protest at the front of the site on the paved area. This is determined by the MPS Public Order Command to be in the region of 500 persons. The Pedestrian Comfort Assessment disclosed to the MPS following the Tower Hamlets Planning Meeting in December was the trigger for this further MPS assessment but it has not formed part of this assembly/protest assessment.

The MPS position continues to be that assembly/protest of up to that size can be safely held on the paved area to the front of the site with proportionate police resource in attendance. The MPS maintains concerns that assembly/protest of numbers greater than 500 will likely impede road surface transport. The road junction layout adjacent to Royal Mint Court will therefore require additional police resource for larger assemblies to balance the safety of those who wish to assemble/protest and the safe free-flow of traffic, as has been borne out from the two recent large scale protests on both 08/02/25 and 15/3/25 where numbers were in the region of



3,000 to 5,000 attendees. Implications of the impact of such activities on the road network are solely a matter for Transport for London.

It is acknowledged that there is a history of protest relating to China, across a number of different sites in London of varying numbers, some exceeding the assessed level that can be held on the paved areas to the front of the proposed Embassy site.

The unpredictability of future events that may trigger assembly/protest, and the numbers that may attend, is a constant consideration at each individual embassy site and our management of the police response and numbers of resources required. We will, of course, continue to manage our response as we do all protests, without fear or favour, liaising with other responsible bodies on specific matters like oversight of the highway, access to public transport or management of the wider public realm.

A copy of this letter will be forwarded to the Home Office.

Yours sincerely

Jon Savell
Deputy Assistant Commissioner
Specialist Operations
Metropolitan Police Service

Annex 3 - Condition Schedule Justification - see final page highlighted text

14.03.25

Condition	Applicant's Position	Applicant Justification	LBTH's Position
LBC 5 (Materials)	Omission of "entry control" and "CCTV" details to form part of this condition requirement at part (e).	<p>The location and appearance of CCTV and entry control systems will be reasonable and will not impact the building's external appearance. As the building entrance is a critical security area, CCTV and entry control systems are essential security measures. Details such as their locations and models are considered sensitive information. Given the level of disclosure in submitted documents, such information should not be included as part of the approval conditions.</p>	<p>Noted the position on security concerns. However, the applicant can request that specific drawings or items be kept confidential at time of submission. If the LPA were to accept that the location and appearance of items that require listed building consent, 'will be reasonable and will not impact the building's external appearance' without seeing evidence to this effect, it would be failing to undertake its statutory duties. The details the LPA seek on the entry control are not in relation to the security specific aspects of these entry control but rather (a) they general visual appearance and (b) how they will attach/may impinge upon listed structures and as such are reasonable and proportionate. The level of detail required will not stray far in terms of (i) entry control and (ii) with CCTV installation as what any observer could view with a naked eye and as such does not present security issues or disproportionate when dealing with listed fabric, curtilage and setting to a listed building</p>

25 (AHOIS)	<p>Omission of parts (d) and (e) with the suggested replacement of the requirement to:</p> <p><i>Provide details of the operational plan of the Heritage Interpretation Centre.</i></p> <p>Omission of part (5) requiring a monitoring report.</p> <p>The current planning application documents include an AOIS, which serves as the foundation for the future preparation of the AHOIS. The AOIS outlines the site's promotional strategy and the operational framework requirements for the HIC, including opening hours, appointment bookings, and other relevant details.</p> <p>The condition as currently worded is too detailed and these matters should be confirmed through solutions developed in consultation with relevant stakeholders.</p>	<p>LPA agree with deletion of 3(c) – specification details of the physical display boards.</p> <p>In relation to 3(d) LPA are aware (and supportive) from the architect's visualisation of the HIC that the intention is some of the 'imported' [artefacts] returned to the HIC may not be behind protective glass hence the LPA seeking certainty the minimum staffing levels set out within the condition. However, are not wholly adverse to the exact minimum staffing levels being agreed with LPA at a future date through discharge of AOIS.</p> <p>4e) In relation to this subsection would seek to retain everything in RED. LPA does not accept alternative in yellow – does not provide sufficient clarity as to the operation of the facility. LPA justification is based upon the importance of the heritage asset and value of best revealing the rich multi layered history of the site to the public in accordance with NPPF. All parties agreed that the archaeology on site is equivalent to Scheduled Ancient Monument status</p>
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26 (EMP)	<p>Omission of the second part of part (c) relating to the steering group or suggested amendments highlighted in yellow if the Inspector deems it appropriate to retain.</p>	<p>The Applicant does not object to the formation of a steering group and continued dialogue on this matter. However, the condition as currently worded imposes meetings too frequently and regardless of necessity or agreement between parties, risking it becoming a procedural formality rather than serving a meaningful purpose. It is therefore considered too onerous and ineffective justifying its removal.</p>	<p>LPA believes retention of part C is necessary to give clear role and mandate for steering group. No objection to suggested text in yellow if Inspector deems necessary.</p>
27 (Privacy Screening)	Omission	<p>On the basis that the proof of evidence demonstrated that adequate separation distances have been achieved (and an improvement compared to the previous consent). No further mitigation is expected to be provided. Exact details will be covered by the detailed drawings under Condition 32 (Architectural Details).</p>	<p>LPA wishes to retain. Previous consent related to a commercial use rather than residential accommodation. LPA believes condition strictly necessary to safeguard privacy of and living conditions of neighbouring property</p>
29 (Aerial/Satellites)	<p>Addition of “<i>required for free communication of official purposes under the Vienna Convention</i>”</p>	<p>Any Embassy development should be permitted and protected for the free communication for all official purposes under the Vienna Convention.</p>	<p>LPA believes reference to Vienna Convention should be deleted and GDPR reference should be reinstated – there are some antennae that are PD on article 2(3) land. The LPA are not seeking to dispute an embassy has the necessary equipment for a diplomatic mission rather the LPA are seeking to ensure they are sensitive to works to a listed structure set within immediate</p>

30 (Energy/ Sustainability)	<p>Omission of disagreed text highlighted in red for its replacement with text suggested in yellow – at Part (D)</p> <p>Omission of the final paragraph relating to monitoring.</p>	<p>The Applicant is entitled under the applicable treaties between the UK and China, including the Vienna Convention on Diplomatic Relations, to choose to adopt UK standards or other equivalent standards (including Chinese standards) for internal areas within the Site exempt from inspection and verification, detailed design and construction and may follow Chinese codes and standards and submit Chinese certificates or other equivalent documentations to certify its fulfillment of certain conditions. The proposed wording for “equivalent international standard” reflects the Inspector’s comments that this will not be a personal consent and therefore applicable for any other embassy.</p> <p>The post complete verification would not involve on going active monitoring so poses no security issue. If there is a case verification report is not placed on public register that case can be presented to LPA at time of submission</p> <p>As explained in the inquiry session, disclosing the level of information required for the post-completion verification report is deemed too sensitive from a security perspective. This is because it involves detailed layout drawings and plant/machinery specification and usage which is redacted from the submitted application documentation.</p> <p>setting of WHS and within the Tower Conservation Area.</p>
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		This is not a requirement specific to the applicant; it applies to all embassy projects internationally, including the new British embassy project in China.	As with LPA response to condition 5, any issues with respect to security and confidentiality can be discussed with the LPA at time of submission. However the visual impact, as opposed to the security minutiae of the entry control and the readily visible CCTV is needed in the interests of good planning especially mindful of all the heritage sensitivities of the site.	
32 (Details)	Omission of details highlighted in red at parts (a) and (b).	Similarly to LBC Condition 5, this level of information – including exact location of CCTV and entry control is too sensitive to disclose in the public domain from a security perspective.	LPA can accept best endeavours approach	
33 (UGF)	Removal of minimum obligation to secure a UGF of 0.3 and replace with target / best endeavours to secure.	London Plan Policy G5 requires all major developments to include urban greening as a fundamental element of site and building design. Part B sets out that the “ <i>Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominantly commercial development (excluding B2 and B8 uses)</i> ” (emphasis added).	It is therefore considered inappropriate to be conditioned to a minimum requirement of 0.3 and when the policy basis (London Plan G5) is a recommended target only.	

	Furthermore, the proposed development has maximised greening wherever possible to demonstrate an UGF of 0.26. The site is constrained largely by the listed buildings and archaeological ruins beneath the site which limits further greening opportunities.	LPA does not see any justification that all requisite EVCP charging should not be provided from the outset.
34 (Car Parking)	The Inspector is invited to replace the condition with the following reduced amount: Notwithstanding the approved drawings, provision should be made for no less than 84 long-term stay cycle parking spaces. One third of the car parking spaces will be provided with an Electric Vehicle Charging Point (EVCP) from the outset with the remaining two-thirds locations reserved for future installation. Such spaces shall be retained thereafter.	As per the Applicant's Transport Evidence by Arup (CD 11.07) (see pages 17 and 18), the Inspector is invited to recommend a reduced quantum of cycle and car parking spaces. On the basis that the proposals are considered to represent an overprovision.
35 (Cycle Parking)	The Inspector is invited to replace the condition with the following reduced amount: Notwithstanding the approved drawings, provision should be made for no less than 180 long-term stay cycle parking spaces. Such spaces shall be retained thereafter.	As per the Applicant's Transport Evidence by Arup (CD 11.07) (see pages 17 and 18), the Inspector is invited to recommend a reduced quantum of cycle and car parking spaces. On the basis that the proposals are considered to represent an overprovision.
39/38 (HIC)	Omission of condition.	Duplicate condition. Details of which will be agreed under Condition 25 – the AHOIS.

Note from the LPA regarding best managing the modest area of public realm set before both the Heritage Interpretation Land and the Cultural Exchange Building, identified as "Exchange Square" within the application documentation that is not adopted highway and is within the applicant's ownership.

This note is with the purpose of: (a) ensuring good place-making; (b) delivering optimum public realm design outcomes; (c) minimising security concerns raised both from the applicant in respect to this open space and the public visiting internally the Heritage Interpretation Centre, and (d) addressing concerns raised by the Foreign Secretary David Lammy and the Home Secretary Yvette Cooper in a letter to the Inspector on 14th January 2025 surrounding public safety risks to citizens and risks to the security of the Embassy. Critically the route map plotted out would achieve these beneficial planning outcomes without any recourse to making amendments to the suite of application drawings such as require fresh public consultation (through introduction of a new boundary treatment set just off the back of the adopted pavement highway in East Smithfield (as SoS's Lammy and Cooper seek) and this fall foul of the Wheatcroft principle.

The satisfactory resolution suggested would minimise matters that might inhibit people from readily accessing the Heritage Interpretation Centre (and simultaneously release the applicant from security concern around visitors to the HIC). The solution is for purpose of defining land as foreign diplomatic mission (bound by the Vienna Convention) is to carve out the Heritage Interpretation Centre and "Exchange Square" from the area earmarked bound by land Vienna Convention.

The LPA direct the Inspector to the agreed definition of Embassy within the s106
"Embassy means the building or parts of the building on the Site together with any ancillary land to be Occupied by the Owner and its staff for the purposes of carrying out the diplomatic functions pursuant to Article 1 of the Vienna Convention".
 Neither the HIC or Harbour Exchange are necessary for purpose of carrying out the diplomatic functions pursuant to a foreign diplomatic mission or Article 1 of the Vienna Convention. Upon that basis and mindful carving this said described area out will ensure the architect's intent that enhances the public realm can be readily realised. Equally at the stroke of this carve out would immediately 'design out' the concerns expressed by SoS's Cooper and Lammy in their letter of 14th January and best realise safety of the public choosing to enjoy the new piece of public realm and those choosing to understand the rich history of the site through visiting the Heritage Interpretation Centre. It is noted when Mr Gwynne from the Council advocated this approach in the *obligations* session of the Local Inquiry Christopher Katkowski KC for the applicant voiced warm comments of good sense at this suggestion from the LPA. The LPA state this position fully acknowledging the decision as to what land is bound by the Vienna Convention is not for the Planning Inspector or Secretary of State for Housing, Communities and Local Government to decide through this Local Inquiry. However we hereby add this note to advocating 'carving out' this previously described area from the Vienna Convention as would achieve the best planning outcomes, eliminate understandable public safety concerns and not fall foul of the Wheatcroft principle or require a diminution of the quality of the public realm.



Ministry of Housing,
Communities &
Local Government

Nona Jones, DP9
Home Secretary
Foreign Secretary

Our Ref: APP/E5900/V/24/3353754 &
APP/E5900/V/24/3353755

Sent by email only

22 August 2025

Dear Nona Jones, Home Secretary and Foreign Secretary

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
APPLICATION MADE BY CHINESE EMBASSY IN THE UK
LAND AT ROYAL MINT COURT, LONDON EC3N 4QN
APPLICATION REFS: PA/24/01229/A & PA/24/01248/NC**

1. Further to our letter of 6 August 2025 inviting written representations on matters in respect of the above applications, please see attached responses received from the following parties:
 - a. DP9 Ltd on behalf of Applicant (cover letter dated 20 August 2025 and other documents enclosed in email from Nona Jones of same date);
 - b. Foreign, Commonwealth and Development Office and the Home Office (letter dated 20 August 2025 enclosed in email of same date);
 - c. Jonathan Boulton (Metropolitan Police Service) (email dated 19 August 2025);
 - d. Simon Bell on behalf of the Royal Mint Court Residents Association (RMCRA) (letter dated 18 August enclosed in email dated 19 August 2025);
 - e. Charles Streeten on behalf of Friends of St Katharine Docks (FOSKD) (note dated 20 August 2025 enclosed in email from Susan Hughes of same date);
 - f. Hongkongers in Britain (representation dated 20 August 2025 enclosed in email of same date).

2. The parties to whom this letter is addressed, and copyees as listed below are invited to provide comments on these representations. Please note that any replies received will be copied to the other parties.
3. For ease of circulation and to fulfil the Department's obligations relating to the General Data Protection Regulation, please do not provide hand written signatures (or copies of) on any responses.

Timescales

4. The Secretary of State considers that a period of 2 weeks to submit responses is reasonable in the circumstances of this case. You are therefore asked to submit any comments you wish to make by email to PCC@communities.gov.uk by Monday 8 September.

Variation of timetable

5. Given the detailed nature of the representations that have been provided, and the need to give parties sufficient opportunity to respond, the Secretary of State considers that more time is needed for full consideration of the applications.
6. The Secretary of State therefore considers that she will not be in a position to reach a decision on the above applications by 9 September 2025, as previously notified. In exercise of the power conferred on her by paragraph 6(2) of Schedule 2 to the Planning and Compulsory Purchase Act 2004, the Secretary of State hereby gives notice that she has varied the timetable for her decision which was previously set, and she will now issue her decision on or before 21 October 2025.

Yours faithfully

Planning Casework Unit

Authorised to consult with parties and to vary timetable on behalf of the Secretary of State

Copied to

London Borough of Tower Hamlets
Royal Mint Court Resident's Association
Interparliamentary Alliance on China
Friends of St Katharine Docks
Royal Mint Tenants and Residents Association
Hongkongers in Britain
Metropolitan Police Service

From: [REDACTED]
To: [PCCUSER](#)
Cc: [PCCUSER](#)
Subject: RE: Called-in applications by Chinese Embassy in the UK for Royal Mint Court, London
Date: 20 August 2025 15:36:16
Attachments:
[REDACTED]

Dear Planning Case Work Unit,

Please find the attached covering letter and enclosures in response to your letter dated 6 August 2025.

Due to file size, please use the following link to access Enclosure 1: [\[REDACTED\]](#)

I would be very grateful if you could please confirm receipt.

Kind regards,

Nona

Nona Jones

Associate Director

DP9 Ltd

100 Pall Mall

London

SW1Y 5NQ

telephone: 020 7004 1700 **website:** www.dp9.co.uk

This e-mail and any attachments hereto are strictly confidential and intended solely for the addressee. It may contain information which is privileged. If you are not the intended addressee, you must not disclose, forward, copy or take any action in relation to this e-mail or attachments. If you have received this e-mail in error, please delete it and notify postmaster@dp9.co.uk

From: Nona Jones

Sent: 13 August 2025 17:06

To: PCCUSER <PCC@communities.gov.uk>

Cc: PCCUSER <PCC@communities.gov.uk>; [REDACTED]

[REDACTED] Embassy in the UK for Royal Mint Court, London

Dear Planning Case Work Unit

The applicant confirms receipt of the letter, and is considering making representations by the deadline.

Kind regards

Nona

Nona Jones

Associate Director

[REDACTED]
[REDACTED]

DP9 Ltd

100 Pall Mall

London

SW1Y 5NQ

telephone: 020 7004 1700 **website:**www.dp9.co.uk

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On 12 Aug 2025, at 14:13, PCCUSER <PCC@communities.gov.uk> wrote:

[REDACTED]

Dear all,

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
CALLED-IN APPLICATIONS MADE BY CHINESE EMBASSY IN THE UK IN
RELATION TO ROYAL MINT COURT, LONDON. APPLICATIONS REF:
PA/24/01229/A1 AND PA/24/01248/NC**

With reference to the above called-in planning applications, we would grateful if you could confirm receipt of the email and enclosed reference back letter which was sent to parties on 6 August 2025. Please send confirmation of receipt, whether or not you wish to make representations on the matters detailed in the letter, to pcc@communities.gov.uk as soon as possible. Please also submit any representations to the same address by Wednesday 20 August.

Regards,
Planning Casework Unit

[REDACTED]

20th August 2025

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Registered No. 05092507

0207 004 1700

Planning Casework Unit

Ministry of Housing, Communities & Local Government
2 Marsham Street
London SW1P 4DF

www.dp9.co.uk

pcc@communities.gov.uk

Dear Planning Case Work Unit,

CALLED-IN APPLICATIONS MADE BY CHINESE EMBASSY IN THE UK

LAND AT ROYAL MINT COURT, LONDON EC3N 4QN

PLANNING APPLICATION REFS: PA/24/01229/A & PA/24/01248/NC

We refer to your letter ('SoS letter') dated 6 August 2025 in respect of the above (ref: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755). We represent the Applicant in this case, and respond to the matters set out therein in the order which they appear. This letter is accompanied by the following enclosures:

- Enclosure 1 – Consolidated Drawings
- Enclosure 2 – Consolidated Drawing Schedule
- Enclosure 3 – Legal Opinion from Christopher Katkowski, KC, CBE dated 19 August 2025

By way of introduction, we are pleased to note that the Secretary of State ('SoS') has received the report of the Inspector following the Public Local Inquiry which commenced on 11 February 2025, and are grateful for confirmation that a decision will be made on or before 09 September 2025.

Our Client attaches great weight to this project, which is urgently needed to address shortcomings in its current diplomatic premises in London. It also represents a major investment in London which will enhance the character and appearance of this vacant site and the wider local area.

Redacted Drawings

We note that concerns have been raised about the fact that some drawings have been marked as being redacted.



As the SoS letter notes, this matter was not raised at the Inquiry by the Inspector or any stakeholders or parties making representations. Similarly, the matter was not raised by the London Borough of Tower Hamlets ('LBTH') during the course of the applications.

However, our clients are pleased to provide further information and to clarify the matters identified in the SoS letter, to the extent that they are material planning considerations and relevant to the decision.

We note that the SoS (paragraph 7) has invited the Applicant to:

- a) identify precisely and comprehensively (i) the plans which have been redacted; and (ii) describe the nature of those redactions;*
- b) Explain the rationale and justification for each of the redactions; and*
- c) Consider whether to provide unredacted versions of the drawings identified in column 1 of Annex A, particularly given the information already before the Inquiry.*

As a matter of principle, as the SoS notes, the grant of planning permission and listed building consent must make clear to all interested parties what has and has not been permitted.

In this case, there can be no possible ambiguity as to the nature of the intended use of the premises, the floorspace proposed, the scale and external appearance of the proposed buildings and the operational effects of the development within its context e.g. traffic generation etc. All these matters were addressed in detail in the application and at the Inquiry.

In the case of the listed building consent application, the details of all the works to the listed buildings have been provided in line with common practice. The proposed drawings, along with supporting documentation, are sufficiently clear as to the works proposed which would affect the character of the building as one of special historical/architectural interest, notably the entrance hall, stairwell and façade of the Johnson Smirke building and façade of the Seaman's Registry.

The Applicant does not consider that, as a matter of principle, that it is necessary or appropriate to provide full internal layout plans (which do not affect the external appearance, listed building matters or material planning considerations) in order to understand what has been permitted. An obvious parallel would be a modern office building, where planning applications commonly show simplified floorplates. With the spatial arrangement of such as desk layouts, internal partitions, break out areas, or associated storage areas etc being matters of internal layout driven by operational needs and not in any event subject to planning control or material consideration. Therefore, the Applicant asserts that the level of detail provided is entirely consistent with established planning norms and sufficient for the purpose of understanding what has been permitted.

Furthermore, when read alongside the supporting documents, the proposals provide a clear and proportionate level of detail, including the intended use of individual floors. The Design and Access Statement in particular provides a more granular explanation of how each of the buildings will be used and how it has informed the proposed layout.



The application of the New Chinese Embassy has followed international diplomatic practice and the UK's planning policy. The level of disclosure of internal functional layout for embassy projects is different from other projects, which is a common practice in the UK and elsewhere in the world. For example, the plans submitted as part of the application for the new US Embassy in Nine Elms did not disclose details of internal layouts.

Notwithstanding the above, and in order to provide a comprehensive response to the matters highlighted by the SoS, the Applicant has instructed David Chipperfield Architects, to consolidate the 43 drawings listed in Annex A of the SoS letter, as provided at Enclosure 1 and listed in the drawing schedule provided at Enclosure 2. These drawings have been consolidated to present the same level of information as the other documentation shown during the Inquiry. This will make sure that the drawings will match the extra information given by the architect during the Inquiry. The 43 drawings enclosed do not contain new information. Of the 9 remaining drawings, 4 drawings relate to the proposed roof plan (B1_P11_14, B2_P11_15, B3a_P11_17 and B4_11_11), which were unnecessarily listed as "redacted" in the first place, as there are no additional details other than those provided during submission and the Inquiry. The other 5 drawings are left unchanged for the reasons set out below, a detailed justification can also be found in Enclosure 2.

- B3b_P21_11 and B3b_P21_12 Proposed staff accommodation layouts, Embassy House - As the current drawings provide sufficient information, including the area of the housing and the functional arrangements such as furniture placement.
- B4_11_05 Location plan and B4_11_08 Site plan, Proposed scheme - The location plan and the site plan should focus on showing the relationship between the building and its surrounding environment, the boundary of the project, without detailing the internal functional layout, room names etc.
- B4_11_19 Proposed works on Cartwright Street, Masterplan - The outdoor renovation project along Cartwright Street focuses on how the building connects with the outside of the site, including the addition of ramps, steps, etc., and does not involve internal information such as room layout.

The Applicant considers the level of detail shown on the unredacted plans is sufficient to identify the main uses of the principle rooms. In these circumstances, we consider it is neither necessary nor appropriate to provide additional more detailed internal layout plans or details.

The above provides the clarity sought by paragraph 7 of the SoS letter. In order to clarify the legal position raised by paragraph 8, the Applicant has sought a legal opinion from Christopher Katkowski, KC, CBE, which is provided at Enclosure 3. The opinion states that:

"For the reasons explained in this Opinion I conclude that it would be entirely lawful for the Secretary of State to determine the planning and listed building consent applications, and to grant both applications, on the basis of the suite of plans referenced in DP9's letter. In my opinion, the Secretary of State has everything that she needs in order to make her decision on both applications and there is



no basis consistent with the relevant legal requirements for such applications (which are discussed below) for requesting any further information additional to that provided in and with DP9's letter."

In conclusion, the Applicant considers that it has responded comprehensively to the queries raised by paragraph 7 of the SoS letter and, in responding to paragraph 8, the Applicant considers that the SoS can reach a lawful determination on i) planning permission and ii) listed building consent on the basis of the enclosed drawings and that having regard to all material planning and listed building considerations and the legal principles involved, it will be manifestly clear from the drawings what has and has not been permitted and that the clarification provided herein regarding the now unredacted drawings put this matter beyond doubt.

Foreign, Commonwealth and Development Office (FCDO) and Home Office (HO) representation

The SoS letter notes the joint Foreign, Commonwealth & Development Office ('FCDO') and Home Office ('HO') representation of 14 January 2025 and invites both parties to address her on matters raised therein.

We note that in respect of the HO request for a hard perimeter and removal of unregulated public access to the pavilion and temporary exhibitions, which the HO suggests could be achieved via a condition requiring the approval of amended designs. The SoS notes that the proposed amendment is not supported by the Applicant, and no plans relating to this proposed design change or suggested condition were put forward to the Inquiry.

At Paragraph 13 the SoS letter refers to *permanent permission for the Metropolitan Police Service and emergency services to access the paved forecourt in front of the Cultural Exchange Building and the HIC ('the Heritage Interpretation Centre'), and the SoS invites the Applicant to address her further on its detailed proposals, any suggested condition, and whether the proposal for permanent consent for access is consistent with the inviolability of the premises of a mission (Article 22 of the Vienna Convention).*

It should be noted that the suggestions made by the HO was because "both the small, paved forecourt and the pavilion would form part of the Chinese Embassy. Due to diplomatic inviolability (Article 22 of the VCDR) of the area, police and other emergency services would require the permission of the Head of Mission (Ambassador) in order to access the site. This could cause a delay in responding to a security incident or health emergency involving a member of the public."

To address the concerns raised by the HO, the Chinese Embassy has sent a Note Verbale (No. D065/25) on 18 March 2025 to the FCDO, copied to the HO and the Planning Inspectorate, making clear that the Chinese side will take necessary measures including regulating public access to the Pavilion/HIC and performing security checks before entry and agrees not to claim diplomatic inviolability for the paved area outside the Pavilion/HIC with a view to providing UK personnel carrying out official duties including police and medical staff with access to the said paved area.

The HIC will retain diplomatic inviolability, as it is part of the building, and as explained at the Inquiry, public access to the HIC will be subject to security checks within the proposed building. While internal



security arrangements will be a matter for the Embassy, the details for public access to this area will be secured through the proposed Event Management Plan Condition.

In the light of this Note Verbale, the Applicant understands that the matters raised in Paragraph 13 of the SoS letter of 6 August 2025, including the question of being consistent with the inviolability of the premises of a mission (Article 22 of the VCDR) have been resolved.

We note the SoS has invited the views of the FCDO and HO, which we anticipate will confirm that these matters have now been addressed, as set out above. Accordingly, the Applicant does not consider there is a requirement for any amendment to the plans or any additional conditions beyond those discussed at the Inquiry.

The SoS letter also invites the FCDO to provide an update on progress towards consolidation of accredited diplomatic premises. We understand that this issue is being resolved through diplomatic channels. We are of the view that the issue of consolidation is not a planning matter, hence is not relevant to the decision that the SoS will be making on or before 9 September 2025.

Letter and attachments from the Rt Hon Iain Duncan Smith MP to the Secretary of State

Our Client has considered the letter and attachments dated 18 June 2025 and attached letter from the MPS dated 10 April 2025, submitted after the Inquiry closed. The settled views of the MPS were clearly explained at the Inquiry and we do not consider that the letter or attachment raises any material planning issues which were not addressed in detail during the course of the Inquiry.

We believe that we have responded in full to the SoS letter and would be very grateful for confirmation of receipt of this representation.

Yours faithfully,

DP9 Ltd.

DP9 Ltd.

Consolidated Drawing Schedule

	Column 1	Column 2	Column 3	Column 4
	Drawing number from Planning (Addendum 2) Drawing List	Link to redacted drawings on inquiry website	Link to location of unredacted indicative drawings	Nature of Remaining Redaction
1	B1_P11_09 Proposed basement floor plan, Johnson Smirke building	CD1.03C p2	INQ11 p42	<p>No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with INQ11 p42 for information purposes. All information has been provided before the Inquiry.</p> <p>Use information for smaller rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p> <p><u>All works to heritage features shown</u></p>
2	B1_P11_10 Proposed ground floor plan, Johnson Smirke building	CD1.03C p3	Fig 6.10.4 p91 CD11.03 INQ11 p41	<p>No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with CD11.03 p91 Fig 6.10.4 and INQ11 p41 for information purposes. All information has been provided before the Inquiry.</p> <p>Use information for smaller rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p> <p><u>All works to heritage features shown</u></p>
3	B1_P11_11 Proposed first floor plan, Johnson Smirke building	CD1.03C p4	Fig 6.10.3 p91 CD11.03 INQ11 p42	<p>No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with CD11.03 p91 Fig 6.10.3 and INQ11 p42 for information purposes. All information has been provided before the Inquiry.</p> <p>Use information for smaller rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p> <p><u>All works to heritage features shown</u></p>
4	B1_P11_12 Proposed second floor plan, Johnson Smirke building	CD1.03C p5	INQ11 p43	<p>No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with INQ11 p43 for information purposes. All information has been provided before the Inquiry.</p> <p>Use information for smaller rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p> <p><u>All works to heritage features shown</u></p>
5	B1_P11_13 Proposed third floor plan, Johnson Smirke building	CD1.03C p6	INQ11 p43	<p>No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with INQ11 p43 for information purposes. All information has been provided before the Inquiry.</p> <p>Use information for smaller rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p> <p><u>All works to heritage features shown</u></p>

6	B1_P11_14 Proposed roof plan, Johnson Smirke building	CD1.03C p7		Unnecessarily listed as 'redacted' in the drawing register. No changes. All works to heritage features shown.
7	B2_P11_09 Proposed basement floor plan, Seaman's Registry Building	CD1.03C p18	INQ11 p52	No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with INQ11 p52 for information purposes. All information has been provided before the Inquiry. Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning. <u>All works to heritage features shown</u>
8	B2_P11_10 Proposed ground floor plan, Seaman's Registry Building	CD1.03C p19	Fig 6.11.4 p93 CD11.03 Applicant PoE-Design INQ11 p53	No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with CD11.03 p93 Fig 6.11.4 and INQ11 p53 (ground floor plan) for information purposes. All information has been provided before the Inquiry. Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning. <u>All works to heritage features shown</u>
9	B2_P11_11 Proposed first floor plan, Seaman's Registry Building	CD1.03C p20	Fig 6.11.3 p93 CD11.03 Applicant PoE-Design	No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with CD11.03 p93 Fig 6.11.3 and INQ11 p53 (typical upper floor plan) for information purposes. All information has been provided before the Inquiry. Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning. <u>All works to heritage features shown</u>
10	B2_P11_12 Proposed second floor plan, Seaman's Registry Building	CD1.03C p21		No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with INQ11 p53 (typical upper floor plan) for information purposes. All information has been provided before the Inquiry. Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning. <u>All works to heritage features shown</u>
11	B2_P11_13 Proposed third floor plan, Seaman's Registry Building	CD1.03C p22		No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space in line with INQ11 p53 (typical upper floor plan) for information purposes. All information has been provided before the Inquiry. Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning. <u>All works to heritage features shown</u>

12	B2_P11_14 Proposed fourth floor plan, Seaman's Registry Building	CD1.03C p23		<p>No redaction to the original drawing. The Rev 01 has been labelled to identify the principle use of the space for information purposes. All information has been provided before the Inquiry.</p> <p>Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p> <p><u>All works to heritage features shown.</u></p>
13	B2_P11_15 Proposed roof floor plan, Seaman's Registry Building	CD1.03C p24		<p>Unnecessarily listed as 'redacted' in the drawing register. No changes.</p> <p>All works to heritage features shown.</p>
14	B3a_P11_09 Proposed basement plan, Cultural Exchange Building	CD1.03C p37	Fig 6.12.12 p99 CD11.03 Applicant PoE- Design INQ11 p60	<p>The Cultural Exchange Building layout in Rev 01 has been unredacted. The details are in line with CD11.03 p99 Fig6.12.12 and INQ11 p60. All information has been provided before the Inquiry.</p> <p>Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
15	B3a_P11_10 Proposed upper ground floor plan, Cultural Exchange Building	CD1.03C p38	Fig 6.12.14 p99 CD11.03 Applicant PoE- Design INQ11 p61	<p>The Cultural Exchange Building layout in Rev 01 has been unredacted. The details are in line with CD11.03 p99 Fig6.12.14 and INQ11 p61. All information has been provided before the Inquiry.</p> <p>Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
16	B3a_P11_11 Proposed first floor plan, Cultural Exchange Building	CD1.03C p39	INQ11 p62	<p>The Cultural Exchange Building layout in Rev 01 has been unredacted. The details are in line with INQ11 p62. All information has been provided before the Inquiry.</p> <p>Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
17	B3a_P11_12 Proposed second floor plan, Cultural Exchange Building	CD1.03C p40	INQ11 p63	<p>The Cultural Exchange Building layout in Rev 01 has been unredacted. The details are in line with INQ11 p63 second floor layout. All information has been provided before the Inquiry.</p> <p>Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
18	B3a_P11_13 Proposed third floor plan, Cultural Exchange Building	CD1.03C p41	INQ11 p63	<p>The Cultural Exchange Building layout in Rev 01 has been unredacted. The details are in line with INQ11 p63 third floor layout. All information has been provided before the Inquiry.</p> <p>Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p>

19	B3a_P11_14 Proposed fourth floor plan, Cultural Exchange Building	CD1.03C p42	INQ11 p64	<p>The Cultural Exchange Building layout in Rev 01 has been unredacted. The details are in line with INQ11 p64 fourth floor layout. All information has been provided before the Inquiry.</p> <p>Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
20	B3a_P11_15 Proposed fifth floor plan, Cultural Exchange Building	CD1.03C p43	INQ11 p64	<p>The Cultural Exchange Building layout in Rev 01 has been unredacted. The details are in line with INQ11 p64 fifth floor layout. All information has been provided before the Inquiry.</p> <p>Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
21	B3a_P11_16 Proposed sixth floor plan, Cultural Exchange Building	CD1.03C p44		<p>The Cultural Exchange Building layout in Rev 01 has been unredacted. All information has been provided before the Inquiry.</p> <p>Use information for remaining rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
22	B3a_P11_17 Proposed roof plan, Cultural Exchange Building	CD1.03C p45		Unnecessarily listed as 'redacted' in the drawing register. No changes.
23	B3b_P11_08 Proposed basement plan, Embassy House, North	CD7.05 1510_A_B3b_11_08_01		<p>The Embassy House layout in Rev 02 has been unredacted. All information has been provided before the Inquiry.</p> <p>Use information for the remaining spaces (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
24	B3b_P11_09 Proposed basement plan, Embassy House, South	CD7.05 1510_A_B3b_11_09_01		<p>The Embassy House layout in Rev 02 has been unredacted. All information has been provided before the Inquiry.</p> <p>Use information for the remaining spaces (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
25	B3b_P11_10 Proposed ground floor plan, Embassy House, North	CD7.05 1510_A_B3b_11_10_01	Fig 6.13.6 p104 CD11.03 Applicant PoE-Design INQ11 p78	<p>The Embassy House layout in Rev 02 has been unredacted. The details are in line with CD11.03 p104 Fig 6.13.6 and INQ11 p78. All information has been provided before the Inquiry.</p> <p>Use information for the remaining spaces (areas with no public access) is not shown, which is however irrelevant to the planning.</p>
26	B3b_P11_11 Proposed ground floor plan, Embassy House, South	CD7.05 1510_A_B3b_11_11_01	Fig 6.13.6 p104 CD11.03 Applicant PoE-Design	<p>The Embassy House layout in Rev 02 has been unredacted. The details are in line with CD11.03 p104 Fig 6.13.6. All information has been provided before the Inquiry.</p> <p>Use information for the remaining spaces (areas with no public access) is not shown, which is however irrelevant to the planning.</p>

27	B3b_P11_12 Proposed first floor plan, Embassy House, North	CD7.05 1510_A_B3b_11_12_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.
28	B3b_P11_13 Proposed first floor plan, Embassy House, South	CD7.05 1510_A_B3b_11_13_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.
29	B3b_P11_14 Proposed second floor plan, Embassy House, North	CD7.05 1510_A_B3b_11_14_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.
30	B3b_P11_15 Proposed second floor plan, Embassy House, South	CD7.05 1510_A_B3b_11_15_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.
31	B3b_P11_16 Proposed third floor plan, Embassy House, North	CD7.05 1510_A_B3b_11_16_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.
32	B3b_P11_17 Proposed third floor plan, Embassy House, South	CD7.05 1510_A_B3b_11_17_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.
33	B3b_P11_18 Proposed fourth floor plan, Embassy House, North	CD7.05 1510_A_B3b_11_18_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.
34	B3b_P11_19 Proposed fourth floor plan, Embassy House, South	CD7.05 1510_A_B3b_11_19_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.

35	B3b_P11_20 Proposed fifth floor plan, Embassy House, North	CD7.05 1510_A_B3b_11_20_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.
36	B3b_P11_21 Proposed fifth floor plan, Embassy House, South	CD7.05 1510_A_B3b_11_21_01		The Embassy House layout in Rev 02 has been unredacted. The details are in line with INQ11 p79 Embassy House typical floor plan. All information has been provided before the Inquiry. Layouts of the units are shown in separate Unit Layout Plan.
37	B3b_P11_22 Proposed sixth floor plan, Embassy House, North	CD7.22 1510_A_B3b_11_22	Fig 6.13.8 p105 CD11.03 Applicant PoE-Design INQ11 p80	The Embassy House layout in Rev 03 has been unredacted. The details are in line with CD11.03p105 Fig 6.13.8 and INQ11 p80. All information has been provided before the Inquiry Layouts of the units are shown in separate Unit Layout Plan.
38	B3b_P11_23 Proposed sixth floor plan, Embassy House, South	CD7.22 1510_A_B3b_11_23	Fig 6.13.8 p105 CD11.03 Applicant PoE-Design INQ11 p80	The Embassy House layout in Rev 03 has been unredacted. The details are in line with CD11.03p105 Fig 6.13.8 and INQ11 p80. All information has been provided before the Inquiry Layouts of the units are shown in separate Unit Layout Plan.
39	B3b_P11_24 Proposed seventh floor plan, Embassy House, North	CD7.22 1510_A_B3b_11_24		The Embassy House layout in Rev 03 has been unredacted. All information has been provided before the Inquiry
40	B3b_P11_25 Proposed seventh floor plan, Embassy House, South	CD7.22 1510_A_B3b_11_25		The Embassy House layout in Rev 03 has been unredacted. All information has been provided before the Inquiry
41	B3b_P11_26 Proposed roof floor plan, Embassy House, North	CD7.22 1510_A_B3b_11_26	Fig 6.13.7 p105 CD11.03 Applicant PoE-Design INQ11 p80	The Embassy House layout in Rev 03 has been unredacted. The details are in line with CD11.03p105 Fig 6.13.7 and INQ11 p80. All information has been provided before the Inquiry.
42	B3b_P11_27 Proposed roof floor plan, Embassy House, South	CD7.22 1510_A_B3b_11_27	Fig 6.13.7 p105 CD11.03 Applicant PoE-Design INQ11 p80	The Embassy House layout in Rev 03 has been unredacted. The details are in line with CD11.03p105 Fig 6.13.7 and INQ11 p80. All information has been provided before the Inquiry.
43	B3b_P21_11 Proposed unit flat layouts, Embassy House	CD7.22 1510_A_B3b_21_11_Unit layouts		Unnecessarily listed as 'redacted' in the drawing register. No changes.
44	B3b_P21_12 Proposed unit flat layouts, Embassy House	CD7.22 1510_A_B3b_21_12_Unit layouts		Unnecessarily listed as 'redacted' in the drawing register. No changes.

45	B4_11_05 Location plan, Proposed scheme	CD1.03C p86		Unnecessarily listed as 'redacted' in the drawing register. No changes.
46	B4_11_08 Site plan, Proposed scheme	CD1.03C p87		Unnecessarily listed as 'redacted' in the drawing register. No changes.
47	B4_11_09 Proposed basement plan, Masterplan	CD7.05 1510_A_B4_11_09_01		The Proposed basement master plan in Rev 02 has been unredacted. All information has been provided before the Inquiry.
48	B4_11_10 Proposed ground floor plan, Masterplan	CD7.05 1510_A_B4_11_10_01		The Proposed ground floor master plan in Rev 02 has been unredacted. All information has been provided before the Inquiry.
49	B4_11_11 Proposed roof plan, Masterplan	CD7.22 1510_A_B4_11_11		Unnecessarily listed as 'redacted' in the drawing register. No changes.
50	B4_11_12 Proposed paving plan, Masterplan	CD7.22 1510_A_B4_11_12_01		The Proposed paving master plan in Rev 02 has been unredacted. All information has been provided before the Inquiry
51	B4_11_19 Proposed works on Cartwright Street, Masterplan	CD1.03C p92		Unnecessarily listed as 'redacted' in the drawing register. No changes.
52	B4_P11_21 Proposed ground floor plan, Masterplan, Entrance pavilion	CD1.03C p107		<p>No redaction to the original drawing. The Rev 01 has been labelled to identify the security check room. All information has been provided before the Inquiry.</p> <p>Use information for smaller rooms (areas with no public access) is not shown, which is however irrelevant to the planning.</p> <p><u>All works to heritage features shown</u></p>

Royal Mint Court

Christopher Katkowski CBE KC

LEGAL OPINION

Introduction

1. I am instructed on behalf of the Chinese Embassy in the UK [“the Embassy”]. The Embassy’s applications for planning permission and listed building consent for a new embassy at Royal Mint Court, London are before the Secretary of State for Housing, Communities & Local Government [“the Secretary of State”] for her determination following her call-in of the applications.
2. By letter [“the letter”] dated 6th August 2025 the Secretary of State confirms receipt of the report of the Inspector who held the public inquiry into the proposals which took place earlier this year, and seeks further information on various matters set out in the letter.
3. Under the heading “Redacted drawings” paragraphs 4 – 6 of the letter explain the background before then in paragraph 7 inviting the Embassy to:
 - “a) identify precisely and comprehensively: (i) the plans which have been redacted; and (ii) describe the nature of those redactions;
 - b) explain the rationale and justification for each of the redactions; and
 - c) consider whether to provide unredacted versions of the drawings identified in column 1 of Annex A, particularly given the information already before the Inquiry.”
4. The letter then raises a point of law in paragraph 8, namely:

“whether she [the Secretary of State] can reach a lawful determination on (i) planning permission and (ii) listed building consent on the basis of the redacted plans. In particular, whether the redactions infringe the principle that a grant of planning permission and listed building consent – both of which are public documents – must make clear to all interested parties what has, and has not, been permitted.”

5. The information requested in paragraph 7 of the letter is provided by DP9 on behalf of the Embassy by letter dated 20 August 2025 [“DP9’s letter”].
6. I address paragraph 8 of the letter in this Opinion, which I understand will be submitted as part of the Embassy’s response to the letter.
7. It can be seen from DP9’s letter that of the 52 drawings listed in Annex A to the Secretary of State’s letter, it is now the case that only 5 drawings remain to be considered by me in this Opinion.
8. Using the numbering (1 – 52) in Annex A these 5 drawings are listed as items 43, 44, 45, 46, 51.
9. However as I will go on to explain in fact nothing is omitted from these drawings which is necessary for the Secretary of State to reach her decision.
10. For the reasons explained in this Opinion I conclude that it would be entirely lawful for the Secretary of State to determine the planning and listed building consent applications, and to grant both applications, on the basis of the suite of plans referenced in DP9’s letter. In my opinion, the Secretary of State has everything that she needs in order to make her decision on both applications and there is no basis consistent with the relevant legal requirements for such applications (which are discussed below) for requesting any further information additional to that provided in and with DP9’s letter.

The law

11. In relation to the planning application the applicable provision is **article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015** by virtue of which:

7. – (1) .. *an application for planning permission must –*

..

(c) .. be accompanied .. by –

- (i) a plan which identifies the land to which the application relates;
- (ii) any other plans, drawings and information necessary to describe the development which is the subject of the application; .."

(Emphasis and additional emphasis added.)

12. Section 55 of the Town and Country Planning Act 1990 ["the 1990 Act"]

defines "development" (in so far as relevant to the planning application for the new embassy) so as to include a "material change in the use" of buildings / land, and "building operations" (s.55(1), (1A) but explicitly does not include "works which .. affect only the interior of the building, or do not materially affect the external appearance of the building" (s.55(2)(a)).

13. In relation to the listed building consent application **section 10(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990** ["the Listed Buildings Act 1990"] provides that such an application:

"shall contain—

- (a)sufficient particulars to identify the building to which it relates, including a plan;
- (b)such other plans and drawings as are necessary to describe the works which are the subject of the application; .."

(Emphasis added.)

14. In the case of works to a listed building, consent is required for any works "which would affect its character as a building of special architectural or historic interest" (section 7(1) of the Listed Buildings Act 1990).

The facts and my opinion

15. In relation to the planning application the agreed description of "the development which is the subject of the application" is:

"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.”

16. In paragraph 8 of this Opinion I refer to 5 drawings.
17. Two of these, namely items 43 and 44 in Annex A to the Secretary of State's letter, show the internal layout of the proposed flats in Embassy House. It is questionable whether the *internal layouts* are “necessary to describe the development which is the subject of the application” in the first place but be that as it may there is certainly nothing missing from these drawings which could conceivably be described as “necessary” in the sense referred to in Article 7 with regards the proposed embassy use and building operations to bring about this use.
18. Another of the drawings, namely item 45 in Annex A of the letter, is simply a location plan for the proposed scheme; while item 46 is a site plan and item 51 is the “masterplan” for the proposed works on Cartwright Street. Once one understands the purpose of these drawings as just described (a location plan, a site plan, a masterplan for one particular part of the site) it is also clear that there is certainly nothing missing from these drawings which could conceivably be described as “necessary” in the sense referred to in Article 7 with regards the proposed embassy use and building operations to bring about this use.
19. With regards the listed building consent application, the Embassy has applied for listed building consent for:
“the refurbishment and restoration of the Johnson Smirke Building (Grade II), partial demolition, remodelling and refurbishment of Seaman's*

Registry (Grade II), retention and repair of the original gatehouse, repair and re-siting of cast iron lamp standards and re-building of the pedestrian entrance adjacent to the north lodge, alterations to the 1980s railings between the two lodges and alterations to existing boundary wall, demolition of substation and all ancillary and associated works".

20. These are very specific works and are shown on the drawings which are before the Secretary of State. None of the 5 drawings I refer to in paragraph 8 of this Opinion omit any works which are the subject of the application.

Overall conclusion

21. In the light of DP9's letter and for the reasons set out in this Opinion I conclude that it would be entirely lawful for the Secretary of State to determine the planning and listed building consent applications, and grant both of them, on the basis of the suite of plans before her. In my opinion the drawings which would be referred to in both consents would – in the language of paragraph 8 of the Secretary of State's letter – make clear to all interested parties what has, and has not, been permitted.

22. Put succinctly, the plans show what the Embassy has applied for planning permission and listed building consent for.

Christopher Katkowski CBE KC

19 August 2025

From: [REDACTED]
To: [PCCUSER](#)
Subject: RE: Reference Back letter - Called-in applications by Chinese Embassy in the UK for Royal Mint Court, London
Date: 20 August 2025 18:40:39
Attachments: [REDACTED]

You don't often get email from [REDACTED] [Learn why this is important](#)

To Whom it May Concern,

In response to your letter of 06 August please find attached a letter on behalf of the Foreign, Commonwealth and Development Office and the Home Office.

Kind regards.

From: PCCUSER <PCC@communities.gov.uk>
Sent: 06 August 2025 11:00
To: PCCUSER <PCC@communities.gov.uk>
Subject: Reference Back letter - Called-in applications by Chinese Embassy in the UK for Royal Mint Court, London

Some people who received this message don't often get email from pcc@communities.gov.uk. [Learn why this is important](#)

Dear all,

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
CALLED-IN APPLICATIONS MADE BY CHINESE EMBASSY IN THE UK IN RELATION TO ROYAL MINT COURT, LONDON. APPLICATIONS REF: PA/24/01229/A1 AND PA/24/01248/NC**

Please find attached a Reference Back letter that has been sent to the following parties in relation to the above called-in planning applications:

- DP9 Ltd (agent on behalf of Chinese Embassy in the UK)
- Secretaries of State for the Home and Foreign Offices

It has been copied to the following parties:

- London Borough of Tower Hamlets
- Metropolitan Police Service
- Interparliamentary Alliance on China
- Royal Mint Court Resident's Association
- Royal Mint Tenants and Residents Association
- Friends of St Katharine's Docks
- Hongkongers in Britain

We would grateful if you could confirm receipt of this email, and submit any representations by email to pcc@communities.gov.uk by Wednesday 20 August.

Regards,
Planning Casework Unit



Follow us online: www.gov.uk/fcdo

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Foreign, Commonwealth & Development Office



Home Office

Planning Casework Unit

Ministry of Housing, Communities & Local
Government
2 Marsham Street
London SW1P 4DF
pcc@communities.gov.uk

20 August 2025

To Whom it May Concern,

TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77

APPLICATION MADE BY CHINESE EMBASSY IN THE UK

LAND AT ROYAL MINT COURT, LONDON EC3N 4QN

APPLICATION REFS: PA/24/01229/A & PA/24/01248/NC

Thank you for the letter from the Planning Casework Unit on 6 August requesting additional information following the Foreign and Home Secretaries' letter of 14 January to the Planning Inspector. That letter drew two specific public order and national security risks to the Planning Inspector's attention, given the need for ongoing work to mitigate these risks. These related to the proposed public access areas at the Royal Mint site and consolidation of China's diplomatic estate in London. Noting the importance of countries having functional diplomatic premises in each other's capitals, it is right for China to be able to carry out its diplomatic work in the UK, as the UK does in China. It is for this reason that we have worked closely across government, policing and with relevant partners to ensure that the breadth of national security issues associated with this planning application have been considered.

The below provides an update on progress on these two matters.

Public Access

The Foreign Commonwealth and Development Office (FCDO) and the Home Office have advocated for a hard perimeter outside the Chinese Embassy to mitigate public safety and national security concerns. This is because access to an internal viewing area for the Cistercian ruins (the pavilion) and the Cultural Exchange Building would be accessible via

a small paved forecourt within the footprint of the embassy. We requested a perimeter because if that area had diplomatic inviolability, it would make it more challenging to ensure public safety. Since our letter, we have worked to negotiate a suitable mitigation with the Chinese applicants as requested by the Planning Inspector during the Inquiry.

We can now confirm that Chinese officials have agreed not to seek diplomatic consent for the publicly accessible paved forecourt that sits within the Embassy grounds. This limits any risks to public order.

The pavilion housing the Cistercian ruins will remain within their diplomatic estate. However, the Chinese authorities have confirmed that they will work with Police partners to put in place the necessary security checks before the public access these ruins. The finer detail of these checks is to be confirmed between the Chinese and UK authorities and will be progressed should planning permission be granted. Should planning permission be granted, we will remain in close contact with Police partners throughout the process.

We view this as an acceptable mitigation to our previously raised concerns and view that it provides consistency with measures required at other diplomatic estates. Police partners remain independent of the process, as they have throughout, and have provided independent advice on the use of Police powers that has assisted us in coming to this decision.

Consolidation

The FCDO, in consultation with the Home Office and other UK Government partners, have had constructive discussions with the Chinese Government regarding consolidation of their existing diplomatic estate in London into the Royal Mint site, by waiving diplomatic status for their current accredited premises in London, with the exception of the Chinese Ambassador's residence. We have agreed with the Chinese Government the broad principles of consolidation and are now in discussions on a small number of outstanding details, before reaching formal agreement. We will write to you again at the earliest opportunity to confirm it has been resolved and no public order or national security risks remain.

As outlined in the letter of 14 January, it is our belief that the Secretary of State for the Ministry of Housing, Communities and Local Government should not make a decision on this application until a firm plan is agreed on the consolidation of the Chinese diplomatic premises.

The FCDO and Home Office would be pleased to provide any further information that would be instructive to assist you in making a decision on the application.

**ON BEHALF OF THE FOREIGN, COMMONWEALTH AND DEVELOPMENT OFFICE
AND THE HOME OFFICE**

From: [REDACTED]
To: [PCCUSER](#)
CC: [REDACTED]
Subject: RE: Reference Back letter - Called-in applications by Chinese Embassy in the UK for Royal Mint Court, London
Date: 19 August 2025 13:02:07
Attachments: [REDACTED]

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Planning Casework Unit,

Thank you for your email, I can confirm receipt. On behalf of the Met Police I can confirm:

- We do not wish to make any submissions around not having sight of what the interior of the building will be used for.
- We do not wish to make any further representations in relation to the hard perimeter.

Kind regards

Jonathan

Jonathan Boulton
Head of Estate Strategy & Engagement



From: PCCUSER <PCC@communities.gov.uk>
Sent: 06 August 2025 11:00
To: PCCUSER <PCC@communities.gov.uk>
Subject: Reference Back letter - Called-in applications by Chinese Embassy in the UK for Royal Mint Court, London

[REDACTED]

Dear all,

TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
CALLED-IN APPLICATIONS MADE BY CHINESE EMBASSY IN THE UK IN RELATION TO ROYAL MINT COURT, LONDON. APPLICATIONS REF: PA/24/01229/A1 AND PA/24/01248/NC

Please find attached a Reference Back letter that has been sent to the following parties in relation to the above called-in planning applications:

- DP9 Ltd (agent on behalf of Chinese Embassy in the UK)
- Secretaries of State for the Home and Foreign Offices

It has been copied to the following parties:

- London Borough of Tower Hamlets
- Metropolitan Police Service
- Interparliamentary Alliance on China

- Royal Mint Court Resident's Association
- Royal Mint Tenants and Residents Association
- Friends of St Katharine's Docks
- Hongkongers in Britain

We would be grateful if you could confirm receipt of this email, and submit any representations by email to pcc@communities.gov.uk by Wednesday 20 August.

Regards,
Planning Casework Unit



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From: [REDACTED]
To: [PCCUSER](#)
Cc: [REDACTED]
Subject: APPLICATIONS BY CHINESE EMBASSY IN THE UK, SITE AT ROYAL MINT COURT, LONDON, EC3N 4QN – PINS REFS: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755 TOWN AND COUNTRY PLANNING ACT 1990 (SECTION 77)
Date: 19 August 2025 16:33:32
Attachments: [REDACTED]

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Dear Sirs,

Please see the attached comments sent on behalf of the Royal Mint Court Residents Association, and in response to your letter of 6th August 2025.

Kind regards

Simon



Simon Bell
Barrister
[View Profile](#)

w: thebarristergroup.co.uk/property

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The Secretary of State for Housing, Communities
and Local Government
Planning Casework Unit
3rd Floor
Fry Building
2 Marsham Street
London SW1P 4DF

18th August 2025

BY EMAIL ONLY: PCC@communities.gov.uk

Dear Secretary of State

**APPLICATIONS BY CHINESE EMBASSY IN THE UK, SITE AT ROYAL MINT COURT, LONDON,
EC3N 4QN – PINS REFS: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755
TOWN AND COUNTRY PLANNING ACT 1990 (SECTION 77)**

1. I am instructed to write to you on behalf of the Royal Mint Court Residents Association (“RMCRA”) and further the letter of 6th August 2025 from the Planning Casework Unit (“the Letter”), sent to the Applicant, Home and Foreign Secretaries and copied to the Tower Hamlets Council and the interested parties.
2. What follows are the RMCRA’s comments in response to that letter. The headings in what follows are taken from the Letter and where necessary, references to paragraphs in the letter are in the form “[PCUL/Paragraph number]”

Redacted Drawings

3. CD10.01 is the RMCRA’s Statement of Case, submitted before it withdrew as a Rule 6 Party. Appended to that document is the Crilly Consulting Design Peer Review (dated 2nd September 2024). That document included (at page 9) a copy of a letter, dated 14th September 2021, sent by the RMCRA to Sir David Chipperfield, acting on behalf

of the Applicant and was sent in respect of the earlier application made by the Applicant and refused by the LPA. The letter originally enclosed a report (the 2021 Security Peer Review) provided by Crilly Consulting Ltd but also raised the following:

*Where it may be that the vulnerabilities are addressed within publicly redacted security measures within the application (for example when the location of a new bomb blast wall was shared with David Clarke by Cundall during the call on the 25th of February 2021), **we would ask full details of all the redacted measures relevant to our areas of concern as shown in the report, to be shared with them to review. (emphasis added)***

4. No reply was ever received from the Applicant in respect of that letter, and no details were provided as to the redactions made to the plans in respect of that earlier application. However, the Applicant was made aware that this was an issue and a problem for the purposes of public consultation and, with the resubmission of the 2021 Security Peer Review as part of the Application currently before the Secretary of State, were again aware that redactions were an issue but chose not to act on them and provide that material, in unredacted form, to either the public or the Inquiry.
5. Crilly Consulting were more than reasonable in their approach to this in 2021. As part of the Introduction found on page 12 of the 2021 review, the following was raised:

It is appreciated that detailed security design measures and the security master plan has been redacted from the public disclosure planning application. This review recognizes that with appropriate and confidential disclosure, the detailed plans may well provide risk treatment and mitigation measures for the vulnerabilities identified.

Andy Williams and Damian Crilly would welcome an opportunity to review the detailed security plans, and 'Security Statement' produced by Cundall, the Security Design Consultant appointed by David Chipperfield Architects and any security assessments and reports produced by the Metropolitan Police CTSA appointed to this project.

6. Again, nothing further was disclosed – either in respect of the earlier application or the current one – to allow a full review of the proposals. This is despite it being clearly

set out to the Applicant that details of the redacted designs were required by members of the public and, in particular, acknowledged experts in the field of security design.

7. It is not understood that the Applicant did, or was even willing to, seek a closed session of the Inquiry under s.321(3) TCPA 1990 to deal with issues relating to security. S.321 is clear that all oral evidence and documentary evidence should be open to public inspection, except where the Secretary of State directs otherwise. No such direction has ever been given. Had such an application been made, it seems likely that one of the interested parties (if not RMCRA, given the difficult circumstances it was in at the time of the Inquiry) would have requested that the Attorney General appoint Counsel to represent the interests of those precluded from hearing or inspecting any evidence at the inquiry had a direction been given.
8. In the absence of any such application or direction, it seems to the RMCRA that any decision to grant permission would be invalid, as the Applicant's attempt to hide a core element of its development from the public, and seemingly the Inspector and the Secretary of State, defies the principle of transparency and hampers the ability for the public to make fully informed and meaningful comments on the Application. It also seeks to bypass the protections found in s.321 of the TCPA 1990.
9. This is clearly a reason (notably of the Applicant's own making) for refusing permission for its proposed Embassy (in addition to the many, valid, reasons advanced by RMCRA, other parties and members of the public).
10. If at PCUL/7 the Secretary of State's intention is to seek to justify a decision to by-pass s.321 TCPA 1990, and allow the Applicant to put redacted material before the Secretary of State directly (and following the conclusion of the Inquiry), this is, in RMCRA's view, unlawful for the reasons set out above.
11. In light of the above, it goes without saying that RMCRA's answer to the question at PCUL/8 is that in the absence of allowing scrutiny of the redacted plans through the s.321 TCPA 1990 process, the Secretary of State cannot lawfully determine to grant planning permission OR listed building consent.

Foreign, Commonwealth & Development Office (FCDO) and Home Office (HO) Representation

12. In respect of PCUL/11-13, to RMCRA (and its security advisors, Crilly Consulting) it is clear that the HO's request for a hard perimeter (which RMCRA takes to mean something more substantial than a wooden fence) and the removal of unregulated public access to the pavilion and temporary exhibitions is an acknowledgment of a constant terrorist threat of attacks from people and vehicles. That has been a major concern of RMCRA throughout this Inquiry and in the earlier application – Royal Mint Court clearly being within a blast zone if a bomb was to be detonated at the Royal Mint (see the RMCRA's Statement of Case (CD10.01) at [8]-[17] and Appendix A to that Statement of Case (the 2024 Security Design Peer Review by Crilly Consulting)).
13. RMCRA's position is that if permission is to be granted to this Application (or any Application of a similar nature), then the FCDO/HO proposals are requirements necessary to protect the residents and the general public. It should have been included in the original proposal submitted to the LPA. RMCRA agrees with Tower Hamlets Council that a hard perimeter cannot now be conditioned – it would be a material change to an application such as the one before the Secretary of State currently, and would require consultation, given the heritage impacts, and would likely lead to a refusal based on heritage impacts – which is presumably why such a perimeter was not included in the Application by the Applicant. However, the Application without the hard perimeter is unacceptable and as such permission should certainly be refused for the reasons set out by RMCRA in its Statement of Case and Statement to the Inquiry, provided on the first day of the Inquiry (INQ 3 and 3a).
14. Should the Applicant respond with the information it is invited to respond with at [PCUL/13], RMCRA is likely to provide its observations on that position once it has seen what the Applicant has to say about this issue. However, RMCRA's position remains (and will remain):
 - i. The fact that the Home Office requires a hardened perimeter adds to RMCRA's view that the proposed site is unsuitable for an Embassy because of the high threat and risk of terrorist attacks, with no available setback to protect the

residents of Royal Mint Court (“RMC”) (as tenants of the Applicant), and the public.

- ii. That to ensure that the RMCRA’s members and the general public are protected (given their proximity to a building that would represent a high threat and risk of terrorist attack), any development of the site by this Applicant will require a hard perimeter blast wall (not a wooden fence) between the proposed Embassy House and RMC party line; protective bomb blast reinforcement of the building façade and glazing of RMC buildings (including Cartwright Street side where the Applicant has indicated the placement of Hostile Vehicle Barriers in their plans) –to adequately protect the residents, public and not just the Embassy.
15. In further respect of [PCUL/13] RMCRA awaits with some interest sight of the Applicant’s position in respect of access and Article 22 of the Vienna Convention. Once the Applicant has made clear what that position is, RMCRA will respond further on that point.

Letter and attachments from the Rt Hon Iain Duncan Smith MP to the Secretary of State

16. RMCRA notes the content of the letter from Mr. Duncan Smith, which deals with some of the issues raised by RMCRA in its letter to you of 2nd April 2025 (see that letter at [16]-[19]). It is with some interest members read the letter from DAC Savell, included as an attachment, dated 10th April 2025. From that letter, it remains clear to RMCRA that policing protests at the site (and bearing in mind it is not yet a functioning embassy) will remain a challenge for the police in terms of costs and resourcing. The MPS withdrawal of its earlier objection now appears to be something that should be recognised as a mistake.

CONCLUSION

17. The “concerns” identified by the Secretary of State in the Letter reinforce those concerns raised by RMCRA and others earlier in this process. There must remain fundamental concerns about this planning application and whilst it seems to RMCRA

18. that the previous Government has indicated to the Applicant that it will get permission for the Royal Mint to be used as the Chinese Embassy¹, clearly this is a case where the objections put forward by those opposed to the Application, clearly present material considerations that far outweigh the benefits of granting permission. The Secretary of State should not attempt to “steamroll” this application through to the detriment of the safety of the public, and in order to fulfil a misconceived and ill-informed decision by an earlier Government to allow the site to be used as the Chinese Embassy.

Yours sincerely

Simon Bell

Counsel

¹ See Hansard, Volume 843, Wednesday 29th January 2025 at 3:37pm where Baroness Chapman of Darlington explains: “*I am slightly surprised that the noble Lord takes that view. I know that he has a background in local government and in planning, but he also has a background in strongly supporting the former Foreign Secretary and Prime Minister, Boris Johnson. **It was Boris Johnson who wrote to the Government of China: “Consent is hereby given for the Royal Mint Court London to be deemed as diplomatic premises for the use as the chancery of the embassy of the People’s Republic of China in London”** (emphasis added)*

From: [REDACTED]
To: [PCCUSER](#)
Subject: FOSKD Response to Reference Back letter - Called-in applications by Chinese Embassy in the UK for Royal Mint Court, London
Date: 20 August 2025 11:38:07
Attachments: [REDACTED]
Importance: High

Dear Sir / Madam

Your Ref: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755

Please see the attached Note on behalf of the Friends of St Katharine Docks in response to the Planning Casework Unit letter of 6th August 2025.

Please will you kindly acknowledge receipt of this email and the attached Note also dated 20th August 2025.

Yours faithfully,

Susan Hughes

Chair
Friends of St Katharine Docks

ROYAL MINT COURT, LONDON, EC3N 4QN

PLANNING INSPECTORATE REFERENCES:
APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755

INQUIRY PURSUANT TO SECTION 77
OF THE TOWN AND COUNTRY PLANNING ACT 1990

NOTE ON BEHALF OF THE FRIENDS OF ST KATHARINE DOCKS
IN RESPONSE TO PLANNING CASEWORK UNIT LETTER OF 6 AUGUST 2025

1. This note is produced on behalf of the Friends of St Katharine Docks (“FOSKD”) and is confined only to those issues upon which the Secretary of State has invited further comment in the letter of 6 August 2025 sent on her behalf by the Planning Casework Unit (“the **6 August Letter**”). For the avoidance of doubt, it is produced without prejudice to FOSKD’s procedural and substantive concerns regarding the decision making process, with regard to the lawfulness of which FOSKD fully reserves its position both generally and (without prejudice to the generality of the foregoing) as regards to the approach taken to the provision of information to the Inquiry which resulted in serious prejudice to objectors, including FOSKD, who either were not provided with relevant information, or were not provided with sufficient time/ opportunity to comment upon information produced late.

Redacted Drawings

2. The first issue upon which the Secretary of State invites further representations in the 6 August Letter is the extent to which she can reach a lawful determination on applications for (i) planning permission; and (ii) listed buildings consent, on the basis of redacted plans (see 6 August Letter para. 8).
3. The truth is that it is not possible lawfully to grant either planning permission or, *a fortiori*, listed buildings consent on the basis of redacted plans. In both cases, the incorporation of redacted plans into the terms of the consent would not be consistent with the fundamental

principle that as public documents, the permission must make clear to all what has, and has not, been permitted.

Background

4. By way of background, FOSKD notes that the drawing list dated 31 January 2025 (to which the 6 August Letter refers) was added to the Council's Planning Portal on Friday 7 February 2025, shortly before the Inquiry opened on 11 February 2025. It therefore post-dated FOSKD having finalised its written representations to the Inquiry and FOSKD was unaware of the fact that redacted drawings had been produced when it made representations to the inquiry on 11 February 2025.

Redacted Drawings: Planning Permission

5. Planning Permission cannot be granted for development shown in redacted drawings.
6. *First*, as a matter of fundamental principle, a planning permission, which is required lawfully to authorise development by virtue of section 55 of the Town and Country Planning Act 1990, is a public document which runs with the land. It must be capable of being relied upon by third parties as well as those originally involved, and may be used to support criminal proceedings (see *Aberdeen City and Shire Strategic Development Planning Authority v Elsick Development Company Limited* [2017] PTSR 1413 citing *Trump International Golf Club Scotland Limited v Scottish Ministers* [2016] 1 WLR 85 at paras. 32 and 66).
7. Development must be carried out in accordance with the plans approved, which form an integral part of the permission granted, which must be read as a whole including with an understanding of the plans. Indeed, the Supreme Court has made clear that in interpreting a grant of planning permission the "plans submitted with the application have particular significance" (see *Hillside Parks Limited v Snowdonia National Park Authority* at para. 27). They may be critical to understanding precisely the development for which permission has been granted (see e.g. *R (Ariyo) v Richmond upon Thames LBC* [2024] EWCA Civ 960 at paras. 22, 27, and 31). Where the plans which accompanied the application are inaccurate (even insofar as the inaccuracy relates only to the depiction of features beyond the land for which permission is sought) it may be impossible lawfully to develop land in accordance with the

permission granted (see *Choiceplace Properties Limited v Secretary of State* [2021] EWHC 1070 (Admin)).

8. It would be contrary to the above principles to grant planning permission in reliance upon, or which incorporates, redacted plans.
9. *Second*, granting planning permission in reliance on redacted plans is inconsistent with the statutory scheme:
 - a. The public (including in this case FOSKD) have the right to know what the plans submitted in support of the application are in advance of determination of the application (see Article 7(1)(c)(ii), 7(2) and 13(4)) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (“the **DMPO**”). It is not consistent with that right for redacted plans to be submitted. On the contrary, to do so is seriously prejudicial to interested parties. That is particularly so in this case, given the particular concerns of FOSKD and other interested parties regarding where particular uses are proposed, and how the site will in practice be used.
 - b. Article 40(4)(a)(ii) of the DMPO requires that the plans submitted in support of the application be placed on the planning register and available for inspection by members of the public. The redaction of such plans is not consistent with that.
10. In those circumstances, the Applicant’s reliance on redacted plans is unlawful.

Redacted Drawings: Listed Buildings Consent

11. The above applies *a fortiori* in the context of a listed buildings consent under the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the **Listed Buildings Act**”). The Listed Buildings Act requires an application for listed buildings consent to include plans and drawings describing the works (see section 10(2)(b)). Any unauthorised works affecting the character a listed building as a building of special architectural or historic interest constitute a criminal

offence. This includes any works to the building internally or externally. In those circumstances, the authorisation conferred with reference to the relevant plans is of particular importance. It is not consistent with the scheme of the Listed Buildings Act to rely upon redacted drawings. Indeed, it would be impossible to determine what the lawful state of the building is, and the nature of the liabilities of current, past or future owners/ occupiers, if listed buildings consent could be granted on the basis of redacted plans.

Conclusion

12. The Applicant's reliance upon redacted drawings is unlawful and misconceived. Neither Planning Permission nor listed buildings consent can be granted in reliance on the plans submitted.

FCDO and HO Representations of 14 January 2025

13. As to para. 10 of the 6 August Letter, FOSKD understanding is that the Applicant does not intend to consolidate all existing diplomatic premises into the proposed new embassy at Royal Mint Court. Even if that were intended, it is not clear how such consolidation is proposed to be secured, noting that in the absence of an enforceable mechanism to secure consolidation, it cannot properly be regarded as a benefit of the proposed scheme.

14. On the question of a hard perimeter, FOSKD in essence agrees with the position summarised at para. 12 of the 6 August Letter (as taken by the Local Planning Authority) that the introduction of a hard perimeter would result in the removal of a material heritage benefit relied upon by the Applicant and would be a material amendment to the application requiring further consultation (see *R (Holborn Studios Ltd) v Hackney LBC* [2017] EWHC 2832).

15. Its position is also, however, that the approach currently proposed by the Applicant is obviously unacceptable and would create a serious risk to members of the public, whose safety within the Heritage Interpretation Centre ("HIC") would be far from certain in cases of emergency.

16. Providing public access to the paved forecourt and the pavilion forming part of the Chinese Embassy would involve putting significant numbers of people at risk, and without the certainty of the ability of emergency services to assist.

17. The Applicant's suggestion that this can be remedied by way of permanent permission for the Metropolitan Police Service and other emergency services to access the paved forecourt in front of the Cultural Exchange Centre and the HIC is wrong in law. No proposed condition has been put forward and it would not be fair to impose a condition without providing the opportunity for comment. As a matter of principle, however, such a condition cannot be imposed:

- a. *First*, a permanent (i.e. irrevocable) permission for the Metropolitan Police Service and other emergency services would not be consistent with Article 22 of the Vienna Convention on Diplomatic Relations 1961 ("the **Vienna Convention**") (given domestic effect by sections 2 and Schedule 1 of the Diplomatic Privileges Act 1964). Article 22 of the Vienna Convention on Diplomatic Relations 1961 was specifically drafted to exclude the ability of the receiving State to take measures for the protection of life and property in an emergency (see E Denza (2016) *Diplomatic Law: Commentary on the Vienna Convention on Diplomatic Relations* (4th Ed) p.118-119). The Rapporteur's original draft of paragraph 1 of the convention gave the agents of the receiving State a power of entry "in an extreme emergency, in order to eliminate a grave and imminent danger to human life, public health, or property, or to safeguard the security of the State" (UN Doc A/CN 4/91 p.2 Art 12). Evidence and examples cited in the International Law Commission debate indicated that this was not consistent with the practice of states, which had historically refused consent even in the event of raging fire. Indeed, at the Vienna Conference, an Amendment permitting the receiving state to take "such measures as are essential for the protection of life and property in exceptional circumstances of public emergency and danger" was rejected. The Vienna Conference therefore clearly determined that the inviolability of mission premises should be unqualified, with the majority of States taking the view that it is at times of 'extreme emergency' that the inviolability of mission premises is most necessary. Primary legislation guarantees the

inviolability of the premises, and were the Chief of Mission to revoke the permission granted to the Metropolitan Police Service or other emergency services to enter the paved forecourt in front of the Cultural Exchange Centre and the HIC, it would be unlawful for them to do so.

- b. *Second*, a condition requiring such permission to be granted would be unlawful:
 - i. It would not meet the tests for the imposition of a planning condition under *Newbury District Council v Secretary of State for the Environment* [1981] AC 578 or NPPF para. 57. For the reasons already given, such a condition would cut across Article 22 of the Vienna Convention. Such a condition would not be reasonable. The limits of reasonableness include the application of the principle of legality, as demonstrated by the seminal case of *Hall & Co Ltd v Shoreham-by-Sea Urban District Council* [1964] 1 WLR 240 (see *DB Symmetry Ltd v Swindon Borough Council* [2020] UKSC 33 at para. 64). As Lord Hodge made clear in *DB Symmetry*, a planning condition (which is by definition imposed unilaterally upon a consent) cannot lawfully be used to require a landowner to surrender a right otherwise guaranteed by Parliament (see paras. 41 and 64). Such a condition is unreasonable in the sense of being *ultra vires*. The same would be true of a condition requiring access to be granted to diplomatic premises, contrary to Article 22 of the Vienna Convention and section 2 and Schedule 1 of the Diplomatic Privileges Act 1961.
 - ii. It would not be enforceable. The enforceability of conditions in relation to diplomatic premises was considered by the High Court of Northern Ireland in *Belfast City Council v Madame Zhang Meifang, The Consul General of the People's Republic of China, Belfast* [2020] NICh 12. McBride J held that breaches of planning control in relation to the Applicant's embassy in Belfast were acts carried out on behalf of the sending State and were therefore carried out in the exercise of consular functions, such that the Consul benefitted from the immunity conferred by Article 43 of the Vienna Convention on Consular Relations, forming part of UK Law by reasons of section 1(1) of the Consular

Relations At 1968 (see paras. 27 and 36). That is also consistent with the position taken in the Encyclopaedia of Planning Law and Practice (see P57.12) which makes clear that sanctions for breaches of planning control (which includes by virtue of section 171A(1)(b) of the Town and Country Planning Act 1990 breaches of condition) are ineffective and cannot be exercised in relation to acts carried out by or on behalf of embassies. Unenforceable conditions cannot lawfully be imposed. Indeed, to rely upon such a condition would obviously be perverse.

18. The legal position is, therefore, that the Applicant's suggestion of a permanent permission for the Metropolitan Police Service and other emergency services is (as if it is properly advised it ought to be aware) entirely hollow. No reliance can lawfully be placed upon it. If members of the public are permitted to access the paved forecourt in front of the Cultural Exchange Centre and the HIC, they will be at serious risk and will only be capable of being aided by the Police or other emergency services with the permission of the Applicant. History has shown that such permission may well not be forthcoming, with embassies having refused assistance from the receiving State in the event of fire and riot since the Vienna Convention came into force (see Denza p.119).

Conclusion

19. For all these reasons, and those previously set out in writing and orally at the inquiry, FOSKD maintains its objection to the grant of permission.

Charles Streeten

Francis Taylor Building

20 August 2025

From: [REDACTED]
To: [PCCUSER](#)
Cc: [REDACTED]
Subject: HKB Representation - Proposed Chinese Embassy Development on the Royal Mint Court site
Date: 20 August 2025 12:38:00
Attachments: [REDACTED]

Your ref.: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755

Dear Planning Casework Unit,

Please find attached Hongkongers in Britain's (HKB) representation in response to your letter of 6 August 2025 regarding the proposed Chinese Embassy development.

Please let me know if you have any questions.

Yours faithfully,

Directors
Hongkongers in Britain

"Aid and Empower"
Hongkongers in Britain (HKB)
www.hongkongers.org.uk
Facebook/ Twitter: @HongkongersUK
HQ: 1 Coral Street, Waterloo, London SE1 7BE

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20 August 2025

Planning Casework Unit
Ministry of Housing, Communities & Local Government
3rd Floor Fry Building, 2 Marsham Street
London SW1P 4DF

Your ref.: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755

RE: Representation of Hongkongers in Britain (HKB) on Redacted Drawings and Safe Public Access Regarding the Proposed Chinese Embassy Development on the Royal Mint Court Site

Dear Sir / Madam,

We are writing on behalf of Hongkongers in Britain (HKB) in response to the Secretary of State's consultation letter dated 6 August 2025. Our organisation represents members of the Hong Kong community residing in the United Kingdom, many of whom live, work, or frequently travel within the Tower Hamlets area.

First of all, we concur with Sir Ian Duncan Smith's letter to the Deputy Prime Minister, dated 18 June 2025, that applicant agnosticism is inappropriate when considering Chinese Embassy's applications.

1. Redacted Drawings

We express profound concern regarding the applicant's submission of redacted drawings, citing "security reasons." The extensive greyed-out areas within the drawings pertaining to the basement of the Embassy House are particularly worrying.

We are apprehensive that these redactions suggest questionable purposes for the Embassy House basement (B3b_11_08 and B3b_11_09). Our concerns are not merely speculative but are substantiated by consistent reports of Chinese consular officers disregarding the rule of law in host states. We wish to highlight a 2022 incident in which a peaceful Hongkonger protester was assaulted and forcibly dragged into the Chinese consulate grounds by Chinese consular staff in Manchester¹, as well as reports of the Chinese government operating overseas police stations².

Even if unredacted drawings are subsequently submitted by the applicant, once the Royal Mint Court site is designated as the Chinese Embassy, UK authorities will be prevented from accessing these spaces and inspecting their compliance with UK law, as restricted by Article 22 of the Vienna Convention on Diplomatic Relations.

¹ <https://www.bbc.co.uk/news/uk-63280519>

² <https://hansard.parliament.uk/commons/2022-11-01/debates/997662A6-CD71-41C5-BBE9-33FADDB4B974/OverseasChinesePoliceStationsInUKLegalStatus>

2. Safe Public Access - "Hard Perimeter" and "Carving Out"

Public access to the area surrounding the Royal Mint Court site buildings presents a significant public safety concern, particularly for individuals participating in protests concerning China. In general, we have observed a lack of concrete information on proposed measures or conditions that will guarantee safe public access to the area around the Royal Mint Court site buildings, in light of recent protests on the Royal Mint Court site and the practices of Chinese consular staff.

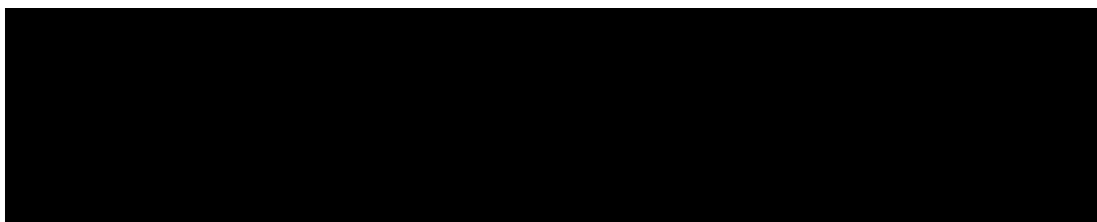
We are doubtful if a "hard perimeter", as suggested by the Home Office, would suffice to protect public safety. We recall another incident in 2024 involving consular staff, wherein, even with a hard perimeter around the Chinese consulate in Manchester, Chinese consular staff ventured outside the perimeter and intimidated a journalist who was filming outside the fence³.

We have more doubts about "carving out" a publicly accessible area from the applicability of Article 22 of the Vienna Convention to ensure access by emergency services and the police, as suggested by the Local Planning Authority (LPA). This suggestion could introduce further complications by creating ambiguity regarding the precise point at which "inviolability" commences within a publicly accessible space, especially when we consider the scenario in the 2022 incident of a Hongkonger protester being dragged into Chinese consulate grounds by consular officers⁴.

We respectfully recommend that the Secretary of State:

- Makes any unredacted drawings submitted by the applicant publicly available and reopens consultation on these drawings;
- Subjects any proposed changes to plans concerning public access to full public consultation and a heritage impact assessment; and
- Grants no permission or listed building consent for the applications in their current state.

Yours faithfully,



Simon Cheng
Founder and Director
Hongkongers in Britain

Julian Chan
Co-Founder and Director
Hongkongers in Britain

Jason Chao
Director
Hongkongers in Britain

³ <https://www.rfa.org/english/china/2024/12/30/china-uk-hong-kong-graffiti-consulate/>

⁴ <https://www.bbc.co.uk/news/uk-63280519>



Ministry of Housing,
Communities &
Local Government

Nona Jones, DP9
Home Secretary
Foreign Secretary

Our Ref: APP/E5900/V/24/3353754 &
APP/E5900/V/24/3353755

Sent by email only

16 October 2025

Dear Nona Jones, Home Secretary and Foreign Secretary

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
APPLICATION MADE BY CHINESE EMBASSY IN THE UK
LAND AT ROYAL MINT COURT, LONDON EC3N 4QN
APPLICATION REFS: PA/24/01229/A & PA/24/01248/NC**

1. Further to our letter of 22 August, recirculating representations received in response to our letter to parties of 6 August in respect of the above applications, please see attached responses received from the following parties:
 - a. The Applicant (Note Verbale dated 8 September 2025 enclosed in email from Dingkun Zhu of same date);
 - b. Ian Austin (Tower Hamlets Council) (email dated 27 August 2025)
 - c. Jonathan Boulton (Metropolitan Police Service) (email dated 28 August 2025);
 - d. Simon Bell on behalf of the Royal Mint Court Residents Association (RMCRA) (letter dated 8 September enclosed in email of same date, and enclosing an Opinion from Lord Banner K.C. dated 6 September);
 - e. Charles Streeten on behalf of Friends of St Katharine Docks (FOSKD) (note dated 8 September 2025 enclosed in email from Susan Hughes of same date);
 - f. Hongkongers in Britain (email dated 8 September 2025); and
 - g. Iain Duncan Smith (IPAC) (letter dated 9 September 2025 enclosed in email of same date).
2. The response from the Foreign, Commonwealth and Development Office and the Home Office (FCDO/HO) to the recirculation of 22 August has not yet been received. Once received it will be shared with parties.

3. For ease of circulation and to fulfil the Department's obligations relating to the General Data Protection Regulation, please do not provide hand written signatures (or copies of) on any responses. Please note that any replies received will be copied to the other parties.

Timescales

4. A timetable to submit responses will be set when the FCDO/HO response to the recirculation of 22 August is circulated. For ease of handling, it would be helpful if all comments could be provided after the FCDO/HO response has been circulated.

Variation of timetable

5. Given the detailed nature of the representations that have been provided, and the need to give parties sufficient opportunity to respond, the Secretary of State considers that more time is needed for full consideration of the applications.
6. The Secretary of State therefore considers that he will not be in a position to reach a decision on the above applications by 21 October 2025, as previously notified. In exercise of the power conferred on him by paragraph 6(2) of Schedule 2 to the Planning and Compulsory Purchase Act 2004, the Secretary of State hereby gives notice that he has varied the timetable for the decision which was previously set, and a decision will now be issued on or before 10 December 2025.

Yours faithfully

Planning Casework Unit

Authorised to consult with parties and to vary timetable on behalf of the Secretary of State

Copied to

London Borough of Tower Hamlets
Royal Mint Court Resident's Association
Interparliamentary Alliance on China
Friends of St Katharine Docks
Royal Mint Tenants and Residents Association
Hongkongers in Britain
Metropolitan Police Service

From: [REDACTED]
To: [PCCUSER](#)
Cc: [REDACTED]
Subject: Note Verbale D141-25 from the Chinese Embassy in the UK
Date: 08 September 2025 15:07:55
Attachments: [REDACTED]

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Sir or Madam,

Hope this email finds you well.

I am ZHU Dingkun from the Chinese Embassy in the UK. Please find attached Note Verbale D141-25 from the Embassy to the Ministry of Housing, Communities and Local Government for your kind reference. A copy of this Note Verbale has also been sent to the Foreign, Commonwealth and Development Office.

Kind regards,

朱定坤 Dingkun Zhu Second Secretary
Embassy of the People's Republic of China in the UK
49/51 Portland Place
London, W1B 1JL



中 华 人 民 共 和 国 大 使 馆

No. D141/25

The Embassy of the People's Republic of China in the United Kingdom of Great Britain and Northern Ireland presents its compliments to the Ministry of Housing, Communities & Local Government and, with reference to the letter of 22 August by the Planning Casework Unit of the Ministry of Housing, Communities & Local Government, has the honour to state the following:

The said letter confirms that the 20 August response from DP9 on behalf of the Chinese Embassy (the cover letter and enclosures), including the consolidated drawings have been received. The Chinese Embassy considers that this has been a comprehensive response to the questions raised by the Ministry of Housing, Communities & Local Government and other related parties.

The application of the new Chinese Embassy has followed international diplomatic practice and the UK's planning policy and procedure. As the legal opinion from Christopher Katkowski CBE KC (enclosure 3 of DP9's letter of 20 August) clearly points out, "The Secretary of State has everything that she needs in order to make her decision on both applications" and "it would be entirely lawful for the Secretary of State to determine the planning and listed building consent applications, and to grant both applications, on the basis of the suite of plans referenced in DP9's letter".

On the public access and consolidation issues, the DP9 letter of 20 August has responded to these. We also noted the response to these issues in the 20 August joint letter by the Foreign, Commonwealth and Development Office and Home Office. The said issues shall not stand in the way of the Secretary of State granting planning permission and

listed building consent to the new Chinese Embassy project.

As for representations against the applications from certain parties, they are either ill-founded or unjustified.

This Note Verbale is intended to serve as a response to the letter of 22 August by the Planning Casework Unit of the Ministry of Housing, Communities & Local Government.

The Embassy of the People's Republic of China avails itself of this opportunity to renew to the Ministry of Housing, Communities & Local Government of the United Kingdom of Great Britain and Northern Ireland the assurances of its highest consideration.

Embassy of the People's Republic of China in the
United Kingdom of Great Britain and Northern Ireland

London, 8 September 2025

C.C Foreign, Commonwealth and Development Office

From: [REDACTED]
To: [PCCUSER](#)
Cc: [REDACTED]
Subject: RE: Email 1 of 3: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London
Date: 27 August 2025 14:31:09
Attachments: [REDACTED]

Dear Sirs,

Thank you for your 3 emails, received yesterday afternoon. I acknowledge safe receipt of all 3 and can confirm that the London Borough of Tower Hamlets does not intend to comment upon the representations made.

Kind regards,

Ian Austin
Principal Planning Solicitor
For Director of Legal Services and Monitoring Officer
Legal Department
London Borough of Tower Hamlets
160 Whitechapel Road
London E1 1BJ

[REDACTED]
[REDACTED]
[REDACTED]
www.towerhamlets.gov.uk

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From: [REDACTED]
To: PCCLUSER
Subject: RE: Called-in applications by Chinese Embassy in the UK for Royal Mint Court, London
Date: 28 August 2025 10:31:19
Attachments: [REDACTED]

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Planning Casework Unit,

To confirm on Fri 22/08/2025 the Met received the following emails:

- Email 1 of 3: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London
- Email 2 of 3: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London
- Email 3 of 3: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London

On behalf of the Met Police I can confirm:

- We do not wish to make any submissions in relation to the Fri 22/08/2025 emails

Kind regards

Jonathan

Jonathan Boulton
Head of Estate Strategy & Engagement



From: [REDACTED]
To: [PCCUSER](#)
Cc: [REDACTED]
Subject: Re: APPLICATIONS BY CHINESE EMBASSY IN THE UK, SITE AT ROYAL MINT COURT, LONDON, EC3N 4QN
- PINS REFS: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755 TOWN AND COUNTRY PLANNING ACT
1990 (SECTION 77)
Date: 08 September 2025 08:31:57
Attachments: [REDACTED]

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sirs,

Further to your letter of 22nd August 2025, please find attached representations made on behalf of the Royal Mint Court Residents Association. Please note, enclosed within this bookmarked PDF is an Opinion dated 6th September 2025, prepared by Lord Banner KC. I have redacted his signature from that document, in line with the guidance issued by the PCU in respect of earlier correspondence.

Kind regards

Simon



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*

[REDACTED]

The Secretary of State for Housing, Communities
and Local Government
Planning Casework Unit
3rd Floor
Fry Building
2 Marsham Street
London SW1P 4DF

8th September 2025

BY EMAIL ONLY: PCC@communities.gov.uk

Dear Secretary of State

**APPLICATIONS BY CHINESE EMBASSY IN THE UK, SITE AT ROYAL MINT COURT, LONDON,
EC3N 4QN – PINS REFS: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755
TOWN AND COUNTRY PLANNING ACT 1990 (SECTION 77)**

1. Further to your letter of 22nd August 2025, I am instructed to write to you on behalf of the Royal Mint Court Residents Association (“RMCRA”). This letter should be read in conjunction with my earlier correspondence of 18th August 2025 and sets out RMCRA’s response to the representations circulated to the parties on 22nd August 2025. In particular, this letter addresses the correspondence from DB9 (on behalf of the PRC) dated 20th August 2025 and the Opinion prepared by Mr. Katkowski CBE KC (dated 19th August 2025).

The Further Submissions Provided

2. RMCRA has carefully considered the responses provided to you on behalf of the Applicant and other interested parties. Having considered the Note provided by Mr. Streeten (on behalf of the Friends of St. Katherine Docks) and the Hong Kongers in Britain, it agrees wholeheartedly with them. It therefore adopts them as part of its objection to these Applications.

3. Further, nothing within the Applicant's representation (including Mr. Katkowski CBE KC's Opinion) changes RMCRA's position in respect of that objection as expressed during the Inquiry and subsequent correspondence. What follows further supplements that objection.

Further Opinion on the Issues of the Redacted Plans and the Vienna Convention – An Unlawful Grant of Permission

4. To assist you in your consideration of these issues, RMCRA has taken the step of seeking an Opinion from the Lord Banner KC on these issues. A copy of that Opinion is enclosed with this letter. Lord Banner KC did not appear at the Inquiry held in February of this year, but has undertaken a review of the submissions provided to you following the letter sent on your predecessor's behalf by the PCU, dated 6th August 2025.
5. You will see that in respect of this application, Lord Banner concludes at [41] of his Opinion that should you grant permission to these Applications as they currently stand, the issues of the redacted Plans and the Vienna Convention would lead to a permission being unlawfully granted. Should that situation arise, be under no illusion that RMCRA intends to challenge such a decision via the High Court.

The Redacted Plans

6. Lord Banner KC has considered this issue at [26]-[33] of his Opinion. The "clarification" that the PRC was "pleased to provide" to you in DB9's letter provides no comfort at all that you can lawfully grant permission on the basis of the plans before you. Clearly, you are required to consider the details omitted from the plans in reaching your conclusion on the Applications. Likewise, the public and statutory consultees are entitled to consider that detail and make representations as to what is proposed. The redacted rooms are, as Lord Banner KC sets out "...integral components of [the] single composite development"¹.
7. In submitting it to you, the PRC are attempting to use Mr. Katkowski CBE's Opinion to "paper over" a serious crack within their case. You should treat the PRC's response on this issue with considerable caution and care. The point remains that a grant of permission here, based on the redacted plans, would be unlawful.

¹ Lord Banner KC's Opinion at [29]

The Hard Perimeter and the Vienna Convention Issue

8. As per paragraph [14] of my letter of 18th August 2025, RMCRA was awaiting with interest to see the PRC's response to the information your predecessor requested from it in respect of the Home Office and Foreign and Commonwealth Office's representations. What has been provided in DB9's letter is no answer to your request and, again, you should treat it with considerable care and caution.
9. RMCRA remains of the view² that for these applications to be acceptable, a hard perimeter/blast wall is required to ensure protection for them, the proposed Embassy, and the general public in the event of a terrorist incident. However, such a wall is clearly not going to be acceptable in terms of the impacts on the heritage assets located within, and around, the proposed development.
10. As set out above, RMRCA agree with Mr. Streeten's analysis, and in particular of his points on this issue at [13]-[18] of his note. RMCRA does not seek to repeat that analysis here.
11. Further to Mr. Streeten's Note, you will see from [36]-[40] of his Opinion that Lord Banner KC has effectively opined that the PRC's proposed "workaround" is, in RMCRA's submission, simply not worth the paper it is purported to be written on (or will be written on). The reassurance given is meaningless and could be revoked at any point. No planning condition could be imposed that would, in effect, trump the Vienna Convention and the Diplomatic Privileges Act 1964.

The Metropolitan Police's Position

12. The RMCRA notes the Metropolitan Police's position, as set out in the email from Jonathan Boulton, dated 19th August 2025. RMCRA remains of the view set out in my letter of 18th August 2025 at [16].

Conclusion

13. In all, therefore, the position remains in RMCRA's view that you cannot lawfully grant permission for the PRC's proposals at this site.

² See my letter of 18th August 2025 at [12]-[13]

14. RMCRA looks forward to confirmation that these Applications have been refused and notes that if you do refuse these Applications, you would be within your rights to do so on the basis that:

- a. the Applicant has failed to provide you (and the public) with the information you need to consider in order to make a decision in respect of the redacted drawings; and
- b. that the Applicant has failed to consider and incorporate into its design elements³ to ensure the protection of the inhabitants of Royal Mint Court, the public and proposed Embassy itself.
- c. that none of the conditions proposed can overcome these issues.

15. These failures are all attributable to the Applicant and its design for this scheme.

Yours sincerely

Simon Bell

Counsel

³ Elements that seek to retain the heritage benefits of the area

IN THE MATTER OF:

PROPOSED NEW CHINESE EMBASSY

AT ROYAL MINT COURT, LONDON EC3N 4QN

OPINION

I. INTRODUCTION

1. I am instructed by Mishcon de Reya LLP on behalf of the Royal Mint Court Residents Association (“**RMCRA**”) in connection with its ongoing objection to the planning application (“**the Application**”), and an associated application for listed building consent, submitted by the People’s Republic of China (“**PRC**”) to the London Borough of Tower Hamlets (“**the Council**”) for a new Chinese Embassy at Royal Mint Court, London, EC3N 4QN.
2. The Application was called in by the Secretary of State for Housing, Communities and Local Government (“**the Secretary of State**”) for her (now his) own determination under s.77 of the Town and Country Planning Act 1990 (“**the 1990 Act**”).
3. A public inquiry was held earlier this year before the Planning Inspectorate’s Inspector Claire Searson, who was then due to write a recommending report for the Secretary of State to consider. It is understood that this report has now been submitted to the Secretary of State.
4. I was not present at the inquiry but I have been informed about the issues debated during it, and I have been provided with the PRC’s closing submissions to the inquiry by Christopher Katkowski CBE KC.

5. On 6th August 2025, the Ministry of Housing, Communities and Local Government (“MHCLG”) wrote to the PRC’s representatives, copying other key stakeholders in the process, concerning two subjects.
6. First, the letter noted that some drawings which were proposed to be tied by planning conditions into any planning permission granted were marked as being redacted. The Secretary of State invited the PRC to identify “*precisely and comprehensively*” the plans which have been redacted and the nature of those redactions, to “*explain the rationale and justification for each of the redactions*” and “*consider whether to provide unredacted versions of the drawings*”: see paragraph 7 of the letter. At paragraph 8 the letter continued:

“The Secretary of State further invites all parties to address her on whether she can reach a lawful determination on (i) planning permission and (ii) listed building consent on the basis of the redacted plans. In particular, whether the redactions infringe the principle that a grant of planning permission and listed building consent – both of which are public documents – must make clear to all interested parties what has, and has not, been permitted.”

7. I shall refer to this as the “**Redactions Issue**”.
8. Secondly, the Secretary of State noted the joint representation dated 14th January 2025 of the Foreign, Commonwealth and Development Office (“FCDO”) and Home Office (“HO”), a copy of which I have been provided with, identifying “*public safety risks and risks to the security of the Embassy*” arising from unregulated public access to an area denoted on the plans as ‘Heritage Interpretation Centre’ (“HIC”) and ‘Cultural Exchange Square’ (described in the letter as a ‘pavilion’ and ‘paved forecourt’) in which members of the public could view the Cistercian ruins in the area, which was put forward by the PRC as a public benefit of the proposed development. The concern expressed by the FCDO and HO was that:

“Under the current plans, members of the public could freely access the paved forecourt and there could be significant numbers of people accessing this area as well as the pavilion to view the Cistercian ruins. Both the small, paved forecourt and the pavilion would form part of the Chinese Embassy. Due to diplomatic inviolability (Article 22 of the VCDR¹) of the area, police and other emergency services would require the permission of the Head of Mission (Ambassador) in order to access the site. This could cause a delay in responding to a security incident or health emergency involving a member of the public.”

9. The letter requested that, in order to deal with this concern, a condition be imposed to require *“a hard perimeter in the form of [a] gated barrier or fence in front of the paved forecourt, at the boundary with the public highway, together with provision for there to be security before accessing the area”* and *“the removal of unregulated public access to the pavilion and temporary exhibitions with arrangements to be made for occasional controlled public access to these parts of the site, subject to liaison between the Chinese Embassy and relevant UK authorities”*.
10. No such condition was put forward by the PRC or the Council at the inquiry or included in the list of potential conditions that was discussed before the Inspector (a copy of which I have been provided with). I understand that there was no evidence put forward by the PRC, or discussion of, the potential effects of a hard perimeter on matters such as townscape and heritage, or the implications for the planning balance of including this and of removing unregulated public access to the pavilion and forecourt.
11. Instead, the PRC’s position, as summarised at paragraphs 57-59 of Mr Katkowski CBE KC’s closing submissions to the inquiry, was that the Embassy could give the UK police and emergency services *“permanent permission”* to access the paved forecourt and pavilion/HIC which could be secured by way of a planning condition.

¹ Vienna Convention on Diplomatic Relations.

12. Against this background, the MHCLG's 6th August 2025 letter indicated that the Secretary of State was "*inclined to agree that the introduction of a hard perimeter would be a material amendment to the application that would require further consultation*". The letter invited comment on this at paragraph 12. At paragraph 13 it continued:

"The Secretary of State also notes the applicant's submission that the matter can be dealt with via security screening within the Heritage Interpretation Centre (HIC), providing a permanent permission for the Metropolitan Police Service and emergency services to access the paved forecourt in front of the Cultural Exchange Building and the HIC, and for this to be addressed by way of a condition. No detailed proposals or proposed wording for a condition was before the inquiry, and the Secretary of State invites the applicant to address her further on its detailed proposals, any suggested condition, and whether the proposal for permanent consent for access is consistent with the inviolability of the premises of a mission (Article 22 of the Vienna Convention).

13. I shall refer to this as the "**Vienna Convention Issue**".

14. Various responses were submitted to the 6th August letter. I have been provided with all of these. Of particular note are the following.

15. In a letter dated 20th August 2025, the PRC's planning consultants DP9 introduced updated drawings, the effect of which was that the number of drawings containing redactions was reduced to 5. An accompanying schedule of drawings euphemistically refers to the redactions as "*Use information for remaining rooms (areas with no public access) is not shown*". Nothing turns on which choice of terminology is used. I shall use the term "*redactions*" for the sake of brevity and because it is the term used in the MHCLG letter.

16. Representations were made in this letter, with the support of a Legal Opinion by Mr Katkowski CBE KC dated 19th August 2025, as to why the level of detail in the plans was sufficient for planning permission lawfully to be granted.

17. On the Vienna Convention Issue, the letter indicated that the Chinese Embassy had sent a Note Verbale (No. D065/25) to the FCDO on 18th March 2025 “*making clear that the Chinese side will take necessary measures including regulating public access to the Pavilion/HIC and performing security checks before entry and agrees not to claim diplomatic inviolability for the paved area outside the Pavilion/HIC with a view to providing UK personnel carrying out official duties including police and medical staff with access to the paved area*”.
18. The letter went on to state that “*The HIC will retain diplomatic inviolability, as it is part of the building, and as explained at the Inquiry, public access to the HIC will be subject to security checks within the proposed building. While security arrangements will be a matter for the Embassy, the details for public access to this area will be secured through the proposed Event Management Plan Condition.*”
19. The Legal Opinion by Mr Katkowski CBE KC dated 19th August 2025 did not deal with the Vienna Convention Issue.
20. By letter dated 20th August 2025, the FCDO and HO took essentially the same position on the Vienna Convention Issue as the DP9 letter.
21. By letter dated 18th August 2025, Mr Simon Bell of counsel made submissions by way of a letter on behalf of RMCRA on the Redactions Issue and Vienna Convention Issue.
22. In a Note dated 20th August 2025, Mr Charles Streeten of counsel opined that, in light of the redactions, planning permission and listed building consent could not be granted; that a condition requiring a hard perimeter as originally sought by the FCDO and HO would be a material change in the application requiring further consultation; and that the workaround proposed by the PRC to provide permanent permission for the police and other emergency services to access the paved forecourt was legally defective.

23. By letter dated 22nd August 2025, MHCLG gave the parties until 8th September to comment on the correspondence submitted during August, including the documents to which I have referred at paragraphs 15-21 above.
24. I am instructed to advise on the Redactions Issue and the Vienna Convention Issue in the light of these documents.
25. In summary, I agree with the analysis of Mr Streeten's Note dated 20th August 2025, which is broadly consistent with the representations submitted in Mr Bell's letter dated 18th August 2025. To avoid duplication, I shall not repeat every point they make. I shall instead express what appear to me to be the most salient points in my own words below. My silence below on any point they make therefore should not be taken to indicate disagreement.

II. THE REDACTIONS ISSUE

26. I understand that the drawings that remain subject to redactions are to be amongst the approved drawings, to which proposed planning condition 2 refers. The wording of this proposed condition is:

“2. Approved Plans –

The development shall be carried out in accordance with the approved drawings listed in the Schedule to this decision notice.

Reason: For the avoidance of doubt and in the interest of proper planning”

27. As the quotation above indicates, the purpose of Condition 2 is “*the avoidance of doubt*”. Far from avoiding doubt, the redactions perpetuate it. The effect of the redactions is that there is no clarity as to the nature of the rooms in question, their intended use, any internal physical structures or other features, and so on.

28. Mr Katkowski CBE KC stresses two points in particular:

- a. First, that Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (“**the DMPO**”) requires only a location plan and any other plans, drawings, and information “*necessary to describe the development which is the subject of the application*”; and
- b. Secondly, “*development*” is defined under s.55(1) of the 1990 Act in terms that exclude “*works which only affect the interior of the building*”: see s.55(2)(a) of the 1990 Act.

29. The difficulty with this analysis, however, is that the proposed development does not “*only affect the interior of the building*”. It is one development involving building and engineering operations within the meaning of s.55(1) of the 1990 Act. No part is expressed to be severable from the other, and in the absence of such express provision the development is to be treated as a single composite development: see *Hillside Parks Ltd. v. Snowdonia National Park Authority* [2022] 1 W.L.R. 5077 (SC) per Lords Sales and Leggatt JJSC at para. 68. The rooms which are the subject of the redactions are integral components of that single composite development.

30. It cannot tenably be said that the detail omitted by the redactions could have no possible planning consequences. It is trite law that the range of matters capable in law of being material planning considerations is very broad. That range is plainly capable of including – by way of non-exhaustive examples – the potential use(s) of the redacted rooms, any structural or safety (including but not limited to fire safety) implications of any physical structures, and/or any amenity considerations in relation to the users of those rooms.

31. Accordingly:

- a. the redactions mean that there is ambiguity in relation to the development for which planning permission is sought; and
- b. that ambiguity relates to matters which are capable in law of being material planning considerations.

32. It follows that:

- a. the requirements of Article 7 DMPO are not satisfied; and
- b. the purpose of Condition 2 ("*for the avoidance of doubt*") cannot rationally be said to be secured by a condition which ties the redacted plans into any planning permission granted, since doubt would remain over several matters the detail of which, if known, would be capable in law of being material planning considerations; and
- c. if planning permission were granted on the basis sought by the PRC, the Secretary of State would have failed to take into account material considerations (namely the details omitted by the redactions and their planning consequences).

33. A further, exacerbating, factor is that the PRC would benefit from diplomatic immunity in relation to the activities that happen in the rooms the details of which are redacted. It is not for me to speculate on what those activities may be. But the fact that, once permission is granted, the PRC has a 'carte blanche' in relation to what goes on inside the rooms whose details have been redacted tells further in support of the conclusion that the Secretary of State needs to be provided with unredacted plans in order to be appraised of all potentially material planning considerations that may bear upon his decision.

34. Mr Bell's letter explains at paragraph 7 that there is a procedural mechanism for dealing with these details in a manner that would preserve any genuine security concerns. Such concerns cannot therefore tenably be said to justify the redactions.
35. The answer to the question posed at paragraph 8 of MHCLG's 6th August 2025 letter is therefore that permission **cannot** lawfully be granted on the basis of the redacted plans.

III. THE VIENNA CONVENTION ISSUE

36. It is plain that without either a hard perimeter in front of the paved area described on the plans as 'Cultural Exchange Square', or an ability for the police and emergency services to access that area at all times, there would be an unacceptable safety risk to members of the public for the reasons explained by the FCDO and HO letter dated 14th January 2025. It does not appear from the material provided to me that the PRC contest this proposition.
37. It is also plain that introducing the hard perimeter at this late stage, whether by means of a new planning condition or an amendment to the plans, would be a material change which, applying the well established *Wheatcroft* principles,² could not lawfully be entertained without there first being consultation at least on a par with the consultation that would have been undertaken had this been part of the original Application. Given the probable implications for the balance of impacts and benefits of the proposed development, this is also likely to require a re-opening of the inquiry so that those implications can be tested through oral evidence and cross-examination in the same way that the rest of the Application was. Neither the PRC nor the Secretary of State is currently proposing either consultation or a re-opening of the inquiry. On that basis, the hard

² See most recently *R (Holborn Studios Ltd.) v. Hackney LBC* [2018] P.T.S.R. 9827.

perimeter option would not be lawful.

38. The question then becomes whether the PRC's proposed workaround is lawful, namely its agreement to forego the diplomatic inviolability of the paved area described on the plans as 'Cultural Exchange Square', so that UK police and emergency services can freely access it at all times.
39. On this issue I am in complete agreement with the analysis at paragraphs 17-18 of Mr Streeten's Note. In particular:
 - a. under Article 22 of the Vienna Convention on Diplomatic Relations,³ as well as s.2 and Schedule 1 of the Diplomatic Privileges Act 1964 ("the 1964 Act") which transpose the Convention into UK law, the PRC would at any time in the future be entitled to withdraw its agreement to forego the diplomatic inviolability of the paved area;
 - b. a planning condition requiring such agreement to be maintained in perpetuity (i) would not meet the test of reasonableness (which in planning law is a pre-requisite of a lawful planning condition⁴), since it would cut against the rights conferred by Article 22 of the Vienna Convention on Diplomatic Relations and the equivalent provisions of the 1964 Act and (ii) would in any event not be enforceable given the immunity conferred on the Embassy, the Ambassador, and other Embassy employees by virtue of Article 43 of the Vienna Convention on Consular Relations⁵ and/or Articles 29-39 of the Vienna Convention on Diplomatic Relations. Either of these points is sufficient on its own for such a condition to be legally incapable of resolving the Vienna Convention Issue.

³ The text of which is available at this link: [Vienna Convention on Diplomatic Relations, 1961](#).

⁴ See the case-law cited at paragraph 17(b)(i) of Mr Streeten's Note.

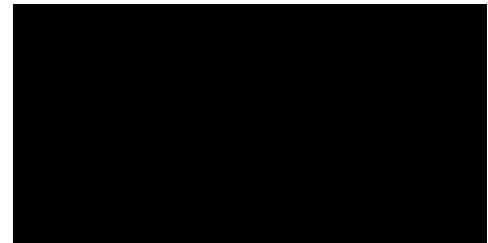
⁵The text of which is available at this link: [Vienna Convention on Consular Relations, 1963](#).

40. Put shortly, in law the PRC's assurances are meaningless. The PRC would be free in domestic and international law to U-turn on them at any time, and there is nothing that planning conditions could do to stop this.

IV. CONCLUSION

41. The grant of planning permission by the Secretary of State on the basis advocated in DP9's letter on behalf of the PRC dated 20th August 2025 would be unlawful, both in relation to the Redactions Issue and in relation to the Vienna Convention Issue.

42. I have nothing further to add as currently instructed. If those instructing me have any further questions, please do not hesitate to contact me in Chambers.



LORD BANNER K.C.

**Keating Chambers
15 Essex Street
London WC2R 3AA**

6th September 2025

From: [REDACTED]
To: [PCCUSER](#)
Subject: FOSKD Response to Reference Back letter - Called-in applications by Chinese Embassy in the UK for Royal Mint Court, London. [A further NOTE dated 08 09 25]
Date: 08 September 2025 14:07:44
Attachments: [REDACTED]

Dear Sir / Madam

Your Ref: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755

Please see the attached further Note on behalf of the Friends of St Katharine Docks in response to the Planning Casework Unit letter of 22nd August 2025.

Please will you kindly acknowledge receipt of this email and the attached further Note dated 8th September 2025.

Yours faithfully,

S. Hughes

Friends of St Katharine Docks

ROYAL MINT COURT, LONDON, EC3N 4QN

PLANNING INSPECTORATE REFERENCES:
APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755

**INQUIRY PURSUANT TO SECTION 77
OF THE TOWN AND COUNTRY PLANNING ACT 1990**

**FURTHER NOTE ON BEHALF OF THE FRIENDS OF ST KATHARINE DOCKS
IN RESPONSE TO PLANNING CASEWORK UNIT LETTER OF 22 AUGUST 2025**

1. This Note is produced on behalf of the Friends of St Katharine Docks ("FOSKD"). It concerns the Secretary of State's invitation to provide comments on the representations appended to the letter from the Planning Casework Unit dated 22 August 2025.
2. In particular, it responds to two issues set out in the letter sent by DP9 on behalf of the Applicant on 20 August 2025 ("the **20 August Letter**"):
 - a. First, the reliance upon redacted plans, in support of which the Applicant relies upon an Opinion from Christopher Katkowski CBE KC dated 19 August 2025 ("the **Katkowski Opinion**"); and
 - b. Second, the proposed approach to diplomatic inviolability in relation to the Pavilion/ Heritage Interpretation Centre.
3. It should be read together with the Note submitted on behalf of FOSKD dated 20 August 2025. Definitions used in that Note are adopted and not repeated.

Redacted Drawings

4. On the first issue, the Katkowski Opinion reasons that the reliance on redacted plans is lawful because:

- a. Works which affect only the interior of the building, or do not materially affect the external appearance of the building, fall outwith the scope of the definition of “building operations” under section 55 of the 1990 Act (see section 55(2)(a)) (see para. 12); and
- b. There is “nothing missing from these drawings which could conceivably be described as “necessary” in the sense referred to in Article 7 [of the DMPO] with regards to the proposed embassy use and building operations to bring about this use” (see para. 17).

5. This analysis is unsustainable. Whilst it is true that works which affect only the interior of a building fall outwith the scope of building operations under section 55 of the 1990 Act, the application before the Secretary of State is not simply for the internal reorganisation of an existing building. Rather, it is concerned with the comprehensive redevelopment of the site to provide an embassy use. This is a single development, no part of which is severable, and which falls to be considered as a whole, having regard to the layout proposed and noting the particular significance attached to the plans submitted (see *Hillside* paras. 27 and 50).

6. Whilst it may, absent any relevant condition, be lawful to carry out works affecting only the interior of an existing building (which is not listed and where the development involves no material change of use) without the need for planning permission, where a new building (or the comprehensive redevelopment of an existing building allowing for its use materially to be changed) is permitted, the plans must show the layout of that building so that its use can properly be understood. That is relevant, for example, to establishing “the purpose for which [the new building] is designed”, which under section 75(3) of the 1990 Act, will govern the lawful use of that building absent alternative specification in the planning permission granted.

7. Were it possible to submit and rely upon redacted plans, it would be impossible properly to understand the scope of the use proposed and to assess the materiality of any future change from it.

8. As already noted, that is of particular importance in this case, where the acceptability of the proposed embassy falls to be assessed having regard to the specific uses proposed across the site.

9. Moreover, it is common practice to secure compliance with the approved plans by condition. That is the approach suggested in this case, with Condition 2 proposed to read:

“2. Approved Plans

The development shall be carried out in accordance with the approved drawings listed in the Schedule to this decision notice.

Reason: For the avoidance of doubt and in the interest of proper planning”

10. The conditions attached to the permission may prevent changes which would not otherwise constitute development, for example by limiting the use of land to a particular category within a use class, notwithstanding that changes of use within that use class do not involve development (see section 55(2)(f) of the 1990 Act).

11. Indeed, the imposition of a condition securing compliance with the approved plans is far from unusual. It is a necessity if development plan policy in London is to be complied with. The London Plan includes requirements regarding, for example, minimum space standards (see Policy D6) and disabled accessibility (D7) which require consideration of the internal layout of buildings. Compliance with these policies is secured by requiring the development to accord with the approved plan in a condition. Similarly, the use of particular rooms may be considered or conditioned where it is relevant to amenity (for example as a result of overlooking or because of the need for adequate daylight). Once this is understood, the comparison drawn by DP9 in the 20 August Letter with the layout of desks in an office building is absurd. Desks are moveable chattels which may freely be reconfigured (often within the large open-plan floorplate consented and conditioned for an office building). The layout of a building is, however, relevant to its acceptability in planning terms, the extent to which it accords with policy, and the lawfulness of its use.

12. For the same reasons, the suggestion in the Katkowski Opinion at para. 17 that the internal layout of the proposed flats in Embassy House is irrelevant in planning terms is unsustainable.

Absent those plans, the impact of the development upon amenity, and its acceptability in terms of relevant development plan policies set out above, cannot properly be ascertained.

13. For these reasons, notwithstanding the Katkowski Opinion, it is not lawful to grant consent for the development on the basis of redacted plans.

The Vienna Convention

14. The Katkowski Opinion does not comment upon the Vienna Convention issue.

15. DP9's proposal is, however, to suggest in reliance on a Note Verbale from the Chinese Embassy (No D065/25) that:

- a. The Chinese Embassy has agreed not to claim diplomatic inviolability for the paved area outside the Pavilion/ Heritage Interpretation Centre with a view to providing UK personnel carrying out official duties including police and medical staff with access to that paved area; and
- b. The Heritage Interpretation Centre will retain diplomatic inviolability, but with public access subject to security checks within the proposed building and public access to this area being secured through the proposed Event Management Plan Condition.

16. The approach is unacceptable in planning terms. The position remains (and it does not appear to be disputed) that members of the public who find themselves on diplomatic premises without access to UK emergency services are put at unacceptable risk in terms of safety.

17. Within the Heritage Interpretation Centre, the Applicant has now confirmed that those members of the public will be on land subject to Article 22 of the Vienna Convention, the purpose of which is to exclude the ability of the receiving state (i.e. the UK) to take measures for the protection of life and property in an emergency. In other words, visitors in that

building would be beyond the reach of help from UK emergency services without express invitation from the Chinese Embassy. Examples illustrating the unacceptability of this need not be extreme. Appropriate response to time critical medical emergencies, such as heart-attack, would be unacceptably delayed by the need for consent from the Head of Mission. A unilateral and revocable promise in a Note Verbale that the embassy proposes to take unspecified “necessary measures” to regulate public access and perform security checks does not change this position. Nor will an Event Management Plan condition satisfactorily address the issue. Any condition imposed will not override the Vienna Convention (nor could it) and in any event, for the reasons previously set out, such a condition would not be enforceable.

18. As to the external paved area, the Chinese Embassy has given no binding commitment not to claim diplomatic inviolability. The Note Verbale that has been provided is apparently no more than a unilateral statement of intent, capable of withdrawal at any time. China has not entered into a binding bilateral agreement (whether through the exchange of Notes or otherwise).

19. In all the circumstances, the position remains as set out previously. The only means of avoiding unacceptable risks to members of the public is the introduction of a hard perimeter, which is not presently the proposal before the Secretary of State.

Conclusion

20. For all these reasons, and those previously set out in writing and orally at the inquiry, FOSKD maintains its objection to the grant of permission.

Charles Streeten

Francis Taylor Building

8 September 2025

From: [REDACTED]
To: [PCCUSER](#)
Cc: [REDACTED]
Subject: Re: Email 1 of 3: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London
Date: 08 September 2025 16:15:58
Attachments: [REDACTED]

Planning Casework Unit
Ministry of Housing, Communities and Local Government

Your Ref.: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755

Dear Sir / Madam,

We are writing to respond to your letter dated 22 August 2025 inviting us to provide comments on the representations of other parties.

We maintain grave concerns that blurring the boundary of diplomatic inviolability could pose a threat to public safety.

Public Access to the Heritage Interpretation Centre (HIC)

The suggestion in the letter from the Foreign, Commonwealth & Development Office (FCDO) and Home Office (HO), dated 22 August 2025, that the HIC would be located within the area with diplomatic inviolability is particularly troubling. The core issue is not whether the Chinese Embassy will perform security checks on HIC visitors, but rather the inherent risk that UK police and emergency services would not have automatic access to the HIC. Given that the HIC is intended for public display of relics, according to the Applicant. The HIC also has no connection to the operational functions of the Chinese Embassy. Public visitors to the HIC could unwittingly enter an area where they would not be fully protected under UK law.

Therefore, we recommend holding a public consultation regarding the proposed alteration to public access conditions for the HIC, as this constitutes a material change to the applications.

Public Access to the Paved Area

Even if diplomatic inviolability is not claimed by the Chinese Embassy, we are concerned that the Applicant might invoke other rights over the paved area to impede pedestrian movement to the effect of interfering with lawful activities such as protests and journalism. The Applicant's practices, such as dragging a protester into their gate^[1] and harassing a journalist outside their consular fence^[2], should be considered when evaluating potential risks to public safety.

Yours faithfully,

HKB Directors

[1] <https://www.bbc.co.uk/news/uk-63280519>

[2] <https://www.rfa.org/english/china/2024/12/30/china-uk-hong-kong-graffiti-consulate/>

"Aid and Empower"

Hongkongers in Britain (HKB)

www.hongkongers.org.uk

Facebook/ Twitter: @HongkongersUK

HQ: 1 Coral Street, Waterloo, London SE1 7BE

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Sent with [Proton Mail](https://protonmail.com) secure email.

From: [DUNCAN SMITH, Iain](#)
To: [REDACTED]
Cc: [REDACTED]
Subject: FAO The Rt Hon Steve Reed
Date: 09 September 2025 15:14:33
Attachments: [REDACTED]

Dear Steve,

Congratulations on your new appointment.

Please find enclosed an urgent letter for your attention.

I look forward to hearing from you.

Yours sincerely,

Iain



The Rt Hon Sir Iain Duncan Smith MP

Member of Parliament for Chingford & Woodford Green

House of Commons

London SW1A 0AA

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The Rt Hon Steve Reed OBE MP
Secretary of State for Housing, Communities and Local Government
Ministry of Housing, Communities and Local Government
2 Marsham Street
London SW1P 4DF

9th September 2025

Dear Steve,

I write in reference to your predecessor's letter of 22 August, appending the responses received from the Chinese Embassy, Home Office (HO), and Foreign, Commonwealth and Development Office (FCDO), regarding the prospective development of Royal Mint Court into a new Chinese Embassy.

Refusal to explain redacted areas

We note that the Chinese side have flatly refused your reasonable request for an explanation regarding the redacted rooms on the embassy plans.

"The Applicant considers the level of detail shown on the unredacted plans is sufficient to identify the main uses of the principle [sic] rooms. In these circumstances, we consider it is neither necessary nor appropriate to provide additional more detailed internal layout plans or details."¹

We further note the legal opinion from Christopher Katkowski KC, arguing that the Secretary of State may lawfully adjudicate the case despite the Chinese Embassy's refusal to provide the requested detail.

Given the security concerns surrounding this project, especially the mounting evidence that Beijing has increasingly sought to use embassies as bases for both interference and hubs for transnational repression, we regard their refusal to be transparent about their plans as unacceptable, not to mention contemptuous of an entirely reasonable request from the UK Government.

It is unfortunately reflective of the state of Beijing's posture towards the UK that they believe they can simply refuse to disclose information that would assuage UK security concerns.

Access to historic ruins

The Home and Foreign Secretaries wrote to the Planning Inspector in January 2025, advocating for the consolidation of Chinese Consular premises into the new site, and for a hard perimeter to enable safe access to the historic ruins on the site.

That letter made clear that diplomatic inviolability would mean that the emergency services or police would require permission from the Chinese mission to enter the site to assist visitors.

The correspondence of 22 August makes clear that the HO and FCDO believe a compromise has been reached. Planning Consultants for the applicant set out the compromise as follows:

¹ DP9 (Planning Consultants) letter to the Planning Casework Unit, 20 August 2025, appended to the Department's letter of 22 August.



*“To address the concerns raised by the HO, the Chinese Embassy has sent a Note Verbale (No. D065/25) on 18 March 2025 to the FCDO, copied to the HO and the Planning Inspectorate, making clear that the Chinese side will take necessary measures including regulating public access to the Pavilion/HIC and performing security checks before entry and **agrees not to claim diplomatic inviolability for the paved area** outside the Pavilion/HIC with a view to providing UK personnel carrying out official duties including police and medical staff with access to the said paved area.” (emphasis added)²*

The HO and FCDO letter, however, adds:

“The pavilion housing the Cistercian ruins will remain within their diplomatic estate.”³

There are several problems with this compromise.

First, the ruins themselves will remain subject to inviolability. Meaning that emergency services and police will ***still* require permission from the Head of Mission to enter the part of the site housing the ruins**. The concerns outlined by the Home and Foreign Secretaries on 14th January, namely that: “[t]his could cause a delay in responding to a security incident or health emergency involving a member of the public”⁴ have not therefore been satisfactorily addressed.

Second, anyone wishing to access the historic ruins will be **searched by Chinese police**. This is fundamentally unsafe for dissidents, and sanctioned parliamentarians. Beijing has a troubling recent history of harassing dissidents. Some have been threatened with “taking them to the embassy”. Further, Parliamentarians sanctioned by China would also have to be searched by Chinese police to access their heritage. Were they, or a dissident to be apprehended by the Chinese while visiting the ruins, the UK would be prevented from intervening. Unfortunately, these concerns are not conjectural or hyperbolic. In 2022, a Hong Kong protester was dragged into the Manchester Chinese Consulate and beaten by the Consul General himself.

Third, it is clear that what is proposed makes access to a site of national historic importance subject to the largesse of a foreign state. We all agree that keeping our citizens safe is the first duty of the government. This compromise would imperil visitors with whom the Chinese Communist Party takes issue. We believe that the Chinese Government should not be able to determine who can and cannot visit UK heritage. Special mention should be made here of dissidents in the UK who have bounties on their heads, and many others who are currently wanted by the PRC state. Are we to believe that they would not be put at risk? I would like to draw your attention to the recent report by the Joint Committee of Human Rights recent report⁵, which highlights China’s poor record of transnational repression.

Sensitive financial infrastructure

It has now been reported by at least five major national outlets, including the BBC, that Royal Mint Court sits over sensitive financial cabling. Indeed, the BBC reported that a Barclays trading floor used

² *Ibid*

³ Letter on behalf of the Foreign Commonwealth and Development Office and Home Office to the Planning Casework Unit, 20th August 2025, appended to the Department’s letter of 22 August.

⁴ Letter from the Rt Hon David Lammy MP, and the Rt Hon Yvette Cooper MP to the Planning Inspector, 14th January, 2025.

⁵ [Transnational repression in the UK](#)



Rt Hon Sir Iain Duncan Smith MP
Member of Parliament for Chingford and Woodford Green
House of Commons, London SW1A 0AA
Tel: 020 7219 2667

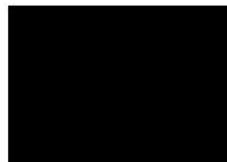
to be housed on the site, connected to the surrounding infrastructure. After the United States Government raised concerns about this, Minister Peter Kyle said on 8th June that any security issues would be addressed "assiduously".

We understand that re-routing the cabling would require permission from the Chinese embassy to dig under the site and would likely cost the public purse millions of pounds.

We do not oppose the Chinese embassy moving to another location. We have diplomatic relations with China, and the existing Chinese embassy itself presents public safety issues. The size, location, unknown purpose, and security ramifications of the Royal Mint Court proposal make it clearly adverse to UK interests.

Taken together, the blunt refusal of the Chinese side to disclose their redacted rooms, inadequacy of the compromise regarding the Cistercian ruins to protect public safety, and security risks and potential costs associated with the cabling issue present a compelling case to refuse this application, and we urge you to take this course of action.

Yours sincerely,



The Rt Hon Sir Iain Duncan Smith MP
UK Co-Chair of IPAC

Alex Sobel MP
Member of IPAC

The Lord Alton of Liverpool
Member of IPAC

From: [REDACTED]
To: [PCCUSER](#)
Subject: RE: Follow up: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London
Date: 10 September 2025 16:33:35
Importance: High

You don't often get email from [REDACTED] [Learn why this is important](#)

[REDACTED]

Dear Planning Casework Unit,

Thank you for your email. We acknowledge its contents and aim to respond by close of play tomorrow.

Best regards,

[REDACTED]

[REDACTED] | **North East Asia and China Directorate**
Foreign, Commonwealth and Development Office | King Charles Street, London SW1A 2AH
[REDACTED]

[REDACTED]

From: PCCUSER <PCC@communities.gov.uk>
Sent: 09 September 2025 09:03
To: PCCUSER <PCC@communities.gov.uk>
Subject: Follow up: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London

[REDACTED]

Dear Home Secretary and Foreign Secretary

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
CALLED-IN APPLICATIONS MADE BY CHINESE EMBASSY IN THE UK IN RELATION TO
ROYAL MINT COURT, LONDON. APPLICATIONS REF: PA/24/01229/A1 AND
PA/24/01248/NC**

Further to our emails of 22 August, we have not received a response to the recirculated representations regarding the above applications. We would be grateful if you could confirm whether you have any further representation to make. Given the recent reshuffle, could you confirm whether you wish to seek an extension of the response deadline in order to make further comments?

Regards

Planning Casework Unit

OFFICIAL

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From: [REDACTED]
To: [PCCUSER](#)
Subject: RE: Follow up: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London
Date: 16 September 2025 19:20:13

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Planning Casework Unit,

Please accept our sincere apologies for the delay in submitting our response. We are currently coordinating internally and greatly appreciate your patience.

We will respond as soon as possible.

Best wishes,

[REDACTED]

[REDACTED] | **North East Asia and China Directorate**

Foreign, Commonwealth and Development Office | King Charles Street, London SW1A 2AH

From: PCCUSER <PCC@communities.gov.uk>
Sent: 15 September 2025 14:55
To: [REDACTED]
Cc: PCCUSER <PCC@communities.gov.uk>
Subject: RE: Follow up: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London

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Thank you for your below email. Could you confirm whether the Home Office and FCDO still intend to submit a response to the recirculation of 22 August? If so, it would be helpful to receive this as soon as possible.

Regards

Planning Casework Unit

From: [REDACTED]

Sent: 10 September 2025 16:33

To: PCCUSER <PCC@communities.gov.uk>

Subject: RE: Follow up: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London

Importance: High

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Planning Casework Unit,

Thank you for your email. We acknowledge its contents and aim to respond by close of play tomorrow.

Best regards,

[REDACTED] | **North East Asia and China Directorate**
Foreign, Commonwealth and Development Office | King Charles Street, London SW1A 2AH

From: PCCUSER <PCC@communities.gov.uk>

Sent: 09 September 2025 09:03

To: PCCUSER <PCC@communities.gov.uk>

Subject: Follow up: Recirculation of representations: reference back on proposed embassy at Royal Mint Court, London

Dear Home Secretary and Foreign Secretary

TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77
CALLED-IN APPLICATIONS MADE BY CHINESE EMBASSY IN THE UK IN RELATION TO
ROYAL MINT COURT, LONDON. APPLICATIONS REF: PA/24/01229/A1 AND

PA/24/01248/NC

Further to our emails of 22 August, we have not received a response to the recirculated representations regarding the above applications. We would be grateful if you could confirm whether you have any further representation to make. Given the recent reshuffle, could you confirm whether you wish to seek an extension of the response deadline in order to make further comments?

Regards

Planning Casework Unit

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