



Ministry of Housing,  
Communities &  
Local Government

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Our ref: APP/E5900/V/24/3353754 and  
APP/E5900/V/24/3353755

Your ref: PA/24/01229/A1 and  
PA/24/01248/NC

*Sent by email only*

20 January 2026

Dear Nona Jones

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77  
PLANNING (LISTED BUILDING AND CONSERVATION AREAS) ACT 1990 – SECTION 12  
APPLICATION MADE BY CHINESE EMBASSY IN THE UK  
ROYAL MINT COURT, LONDON, EC3N 4QN  
APPLICATION REFS: PA/24/01229/A1 and PA/24/01248/NC**

*This decision was made by the Secretary of State*

1. I am directed by the Secretary of State to say that consideration has been given to the report of Claire Searson MSc PGDip BSc (Hons) MRTPI IHBC, who held a public local inquiry between 11 February and 19 February 2025 into your client's applications for:

Planning permission

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, in accordance with application ref PA/24/01229/A1, dated 15 July 2024.

Listed building consent

Refurbishment and restoration of the Johnson Smirke Building (Grade II\* listed), partial demolition, remodelling and refurbishment of the Seaman's Registry (Grade II listed), with alterations to the west elevation of the building, the retention, along with part demolition and alterations to the existing boundary wall and front railings and demolition of substation, associated landscaping, and all ancillary and associated works, in accordance with application ref PA/24/01248/NC, dated 15 July 2024.

2. On 14 October 2024, the previous Secretary of State directed, in pursuance of Section 77 of the Town and Country Planning Act (TCPA) 1990, and Section 12 of the Planning (Listed Buildings and Conservation Areas) Act (LBCA) 1990, that your client's applications be referred to her

instead of being dealt with by the local planning authority, the London Borough of Tower Hamlets (LBTH).

### **Inspector's recommendation and summary of the decision**

3. The Inspector recommended that the applications be approved and planning permission and listed building consent be granted, subject to conditions.
4. For the reasons given below, the Secretary of State agrees with the Inspector's conclusions, except where stated, and agrees with her recommendations. He has decided to grant planning permission and listed building consent, subject to conditions. The Inspector's Report (IR) is attached. All references to paragraph numbers, unless otherwise stated, are to that report.

### **Environmental Statement**

5. In reaching this position, the Secretary of State has taken into account the 2021 Environmental Statement and the Environmental Statement Addendum which were submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). Having taken account of the Inspector's comments at IR5.1-5.3, the Secretary of State is satisfied that the Environmental Statement and Environmental Statement Addendum comply with the above Regulations and that sufficient information has been provided for him to assess the environmental impact of the proposal.

### **Consent under the Diplomatic and Consular Premises Act (DCPA) 1987**

6. As well as requiring planning permission and listed building consent, the Secretary of State notes that in order to operate as an embassy, consent is also required under the DCPA 1987. Alongside other requirements, section 1(5) provides that in determining whether to give consent for land to be used as diplomatic or consular premises, the relevant Secretary of State (for the Foreign, Commonwealth and Development Office (FCDO) in this case) shall have regard to all material considerations, in particular, (a) to the safety of the public; (b) to national security; and (c) to town and country planning.
7. The FCDO confirmed by way of a letter dated 12 January 2026 that former Foreign Secretary Boris Johnson granted conditional diplomatic consent for Royal Mint Court under the DCPA 1987 by way of a Note Verbale on 4 May 2018. The consent is conditional on the embassy obtaining any necessary planning permission. The FCDO stated that the consent originally included Exchange Square; however, the geographical area covered by the consent no longer extends to Exchange Square. Therefore, 'Exchange Square is not covered by diplomatic consent and inviolability<sup>1</sup> cannot apply to it'.<sup>2</sup>
8. While the Secretary of State has had regard to this grant of diplomatic consent where relevant to the planning considerations, he has determined the applications for planning permission and listed building consent on their own merits in light of all the evidence before him.

### **Application handling and identity of applicant**

9. Like the Inspector, the Secretary of State is aware that a number of issues relating to the handling of the applications, allegations of political interference and the identity of the proposed occupants have been raised by parties (IR13.6). For the reasons given at IR13.8-13.21, the Secretary of State agrees with the Inspector that there is nothing to suggest that there has been anything improper in the approach of the Metropolitan Police Service (MPS), that LBTH and the MPS fulfilled their responsibility to review their cases, as part of sensible on-going case management,

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<sup>1</sup> Under Article 22 of the Vienna Convention on Diplomatic Relations 1961

<sup>2</sup> The Secretary of State notes that representations have queried the basis on which conditional consent can be granted under the DCPA 1987. However, he considers that this is not an issue which he needs to resolve to determine this application because either way there would be no valid consent for Exchange Square.

and that both parties fully fulfilled their duties to the inquiry itself (IR13.18). He further agrees that a proper process has been followed in respect of the inquiry and that the Inspector has been able to come to a reasoned recommendation based on the planning evidence (IR13.21). This evidence has been supplemented by the material put forward subsequently, including as set out in paragraphs 14-19 below, and the Secretary of State considers that he has sufficient information to proceed to a decision on the matters raised and the applications as a whole. In making planning casework decisions, Ministers and officials act in accordance with published propriety guidance.<sup>3</sup>

10. The Secretary of State notes that the applications are not being pursued on the basis of a personal permission (IR13.22-13.24); however, the intention is that the premises shall be occupied as an embassy by the People's Republic of China (PRC). For the reasons given at IR13.25-13.30, he agrees that any ethical or similar objections to the provision of an embassy for a specific country cannot be a material planning consideration (IR13.27). He further agrees that PRC is not a material consideration in itself, and nor are any moral, ethical or cultural considerations which may or may not arise from the PRC as occupants (IR13.29). For the same reasons, the Secretary of State considers that the same is true of general (as opposed to site-specific – see paragraph 11 below) concerns around national security arising from the identity of the proposed occupants. The Secretary of State agrees with the Inspector's overall approach to the identity of the proposed occupants (IR13.29). He notes the Inspector's comments at IR13.93 and considers that non-site-specific national security concerns would be dealt with by other means, via other legal processes and by various agencies, including under the Vienna Conventions (see footnote 9 below), and that this is not something that can be controlled through the planning system.
11. However, the Secretary of State further notes that a number of site-specific issues related to the proposed occupants have been raised (IR13.25.1-13.25.5), including matters related to security. This includes concerns relating to the proximity of telecommunications cables at the Wapping Telephone Exchange (IR10.95 and IR10.296). He considers that site-specific matters linked to the identity of the proposed occupants, including in relation to national security, are capable of being material planning considerations, and these matters are addressed below. Insofar as they are material to the planning case before him, the Secretary of State has taken site-specific national security considerations into account in reaching his decision.
12. In reaching his conclusions on security, the Secretary of State has taken into account the statement of FCDO/Home Office (HO) in their representation of 27 November 2025 that they 'have worked closely across government, with policing, and other relevant partners, to ensure that the breadth of national security issues associated with this planning application have been considered and addressed'. He notes that the concerns raised by FCDO/HO in their joint representation to the inquiry of 14 January 2025 have been resolved, and no further concerns have been raised by them.
13. The Secretary of State also notes that no request for a direction under section 321(3) of the TCPA 1990 was made by any party at the inquiry, and no such request was subsequently made by any party after the close of the inquiry.

### **Matters arising since the close of the inquiry**

#### Further information sought by the Secretary of State

14. On 6 August 2025, the previous Secretary of State wrote to parties to give them an opportunity to comment on a number of matters relating to redacted drawings, the requests made by HO and FCDO in their joint representation of 14 January 2025,<sup>4</sup> and a post-inquiry representation from

<sup>3</sup> <https://www.gov.uk/government/publications/planning-propriety-issues-guidance>

<sup>4</sup> CD12.02 and CD12.02a. The representation letter, erroneously dated 14 January 2024, was sent to the inquiry on 14 January 2025. The FCDO clarified this via a Parliamentary Question (27379) in February 2025.

the Rt Hon Iain Duncan Smith MP dated 18 June 2025 which enclosed a letter from the MPS dated 10 April 2025. A list of representations received in response to the previous Secretary of State's letter and details of the various recirculations of these responses is at Annex A. The Secretary of State notes that MPS, LBTH and the Royal Mint Tenants and Residents Association (RMTA) made no substantive comments. Further information was sought from the FCDO on 9 January 2026, with a response being received on 12 January 2026. Parties were given an opportunity to comment. Details are set out in Annex A.

#### Documents held by LBTH

15. In his letter to the Minister of State for Housing and Planning of 29 August 2025, Kevin Hollinrake MP drew attention to two documents which were not on the Council's planning register (and hence not before the inquiry) – a Security Statement and a Blast Assessment. On 16 September 2025 the Secretary of State wrote to LBTH inviting it to provide these documents and address him on:
  - whether these documents are relevant to the decision now before him;
  - if so, whether the content of these documents is addressed in the case LBTH put to the inquiry; and
  - whether these documents make a material difference to that case.
16. On 23 September 2025 LBTH responded, stating that:
  - it is for the Secretary of State to reach his own conclusion whether these documents are relevant to the decision before him;
  - the documents are not addressed in the Statement of Case or Proof of Evidence which LBTH put to the Inquiry; reference is made in the Committee Report prepared in relation to the application scheme to the review of the Blast Assessment undertaken by the Counter-Terrorism Security Adviser (CTSA) for the original refused application for an embassy on the site; and
  - the documents did not make a material difference to the case LBTH put to the Inquiry.
17. Both documents were provided to the Secretary of State. He has carefully considered whether it was necessary for these documents to be shared with parties for comment before a decision was taken, noting that representations to the inquiry from Royal Mint Court Residents' Association (RMCRA) and RMTA refer to these documents not being publicly available and raise concerns regarding the clarity of security measures. He has concluded that it was not necessary to share these documents before proceeding to a decision. Security arrangements were fully canvassed at the inquiry, with the Inspector's conclusions being set out at IR13.146-13.156. Conditions 25, 26, 27 and 35 in Annex B2 deal with security (IR13.191-13.192 and IR13.199), as does the s.106 at schedule 3 (IR13.205-12.210). The Secretary of State's conclusions on these matters are at paragraphs 53-60 below. Neither document deals with new matters which were not discussed at the inquiry. Both documents are inputs to other publicly available documents. The Security Statement is referred to in paragraph 9.2 of the Design and Access Statement, which was an inquiry document.<sup>5</sup> The Blast Assessment was commissioned by LBTH at the request of the CTSA and formed an input into the CTSA advice which was subsequently provided to LBTH. The CTSA advice informed the Committee Reports for the original refused application,<sup>6</sup> and the current application.<sup>7</sup> These Committee Reports were both inquiry documents. While not every piece of information in the Security Statement and the Blast Assessment was directly before the inquiry, the Secretary of State does not consider that the information they contain would meaningfully add to the material information on which the decision is based, or would result in a

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[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

<sup>5</sup> [CD 7.07 - Design and Access Statement V2.pdf](#) | Powered by Box

<sup>6</sup> Para 7.83-7.100, [CD 9.01 LBTH OFFICER REPORT FOR PREVIOUS APPLICATION 01.12.22.pdf](#) | Powered by Box

<sup>7</sup> Paras 5.91-5.95 and 7.89-7.109, [CD 9.04 LBTH OFFICER REPORT 09.12.24.pdf](#) | Powered by Box

different conclusion on security arrangements or the decision as a whole. The wider statutory framework and the substance deriving from these documents was considered by the parties and the Inspector, and security measures will be subject to future approval by LBTH under proposed conditions 25, 26 and 35, with details of CCTV being subject to approval under condition 27.

18. The Secretary of State has considered his duties under Rule 17 of the Town and Country Planning (Inquiries Procedure) (England) Rules 2000. He is not, as a result of his consideration of these documents, disposed to disagree with a recommendation of the Inspector, and he was not therefore required to notify parties of this evidence, or to disclose the contents of the documents or circulate them. He has further concluded, for the reasons set out at paragraph 17 above, that it was not necessary to circulate the documents to the parties prior to reaching a decision as a matter of general procedural fairness.
19. As the Secretary of State has concluded that it was not necessary to share these documents, he has further concluded that it was not necessary to reopen the inquiry or share them under a s.321 direction.

#### Other

20. On 16 December 2025, the Written Ministerial Statement (WMS) 'Planning Reform: Next Phase' (UIN HCWS1187) was published. On that same date, the government launched a consultation on a revised version of the existing National Planning Policy Framework (the Framework). The Secretary of State does not consider that the WMS or this consultation raises any matters that would require him to refer back to the parties for further representations prior to reaching his decision on these applications, and he is satisfied that no interests have thereby been prejudiced.
21. Since the closure of the Inquiry, LBTH has undertaken a further focused Regulation 19 consultation and submitted a draft Local Plan to the Secretary of State for examination. An early stage consultation for the next London Plan has also been undertaken. This is addressed further at paragraphs 29-30 below. As parties anticipated submission of the draft Local Plan and attributed no weight to emerging policies on that basis (see paragraph 29 below), and due to the early stage of the emerging London Plan, the Secretary of State does not consider that these events raise any matters that would require him to refer back to the parties for further representations prior to reaching his decision on these applications, and he is satisfied that no interests have thereby been prejudiced.
22. Annex A of this letter lists representations which have been received since the inquiry. The Secretary of State has considered all the representations. Where the matters warranted further investigation, he has carried out investigations and where necessary referred back to parties, for example as set out at paragraphs 14-19. Otherwise, the Secretary of State is satisfied that the matters raised do not affect his decision. Copies of letters listed at Annex A may be obtained on request to the email address at the foot of the first page of this letter.<sup>8</sup>
23. Where responses and representations raised material planning considerations, the Secretary of State has taken these into account in reaching his decision.

#### **Policy and statutory considerations**

24. In reaching his decision, the Secretary of State has acted in accordance with section 38(6) of the Planning and Compulsory Purchase Act (PCPA) 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.
25. In this case the development plan consists of the London Plan 2021 (LP) and the Tower Hamlets Local Plan 2020 (THLP). The Secretary of State considers that relevant development plan

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<sup>8</sup> With the exception of the Security Statement and Blast Assessment referred to at paragraphs 15-19 above.

policies include those set out at IR6.4-6.11, IR6.14-6.18, IR6.23-6.29, IR6.35, IR6.38-6.39 and IR6.42-6.46.

26. Other material considerations which the Secretary of State has taken into account include the Framework published on 12 December 2024 and updated on 7 February 2025, associated planning guidance (the Guidance), and the matters referred to at IR6.13, IR6.19, IR6.22, IR6.34, IR6.37, IR6.41 and IR6.55.
27. In considering whether to grant listed building consent, in accordance with section 16(2) of the LBCA 1990, the Secretary of State has had special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. In accordance with section 66(1) of the LBCA 1990, he has paid special regard to the desirability of preserving those listed buildings potentially affected by the proposals, or their settings or any features of special architectural or historic interest which they may possess. In accordance with section 72(1) of the LBCA 1990, he has paid special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
28. He has also had regard to, and acted in accordance with, international legal obligations including those set out at IR6.47-6.50 relating to the Vienna Conventions.<sup>9</sup>

#### Emerging plan

29. The emerging plan includes a new draft Local Plan. Since the closure of the Inquiry there has been a further focused Regulation 19 consultation, and the draft Local Plan was submitted to the Secretary of State for examination in November 2025. The Secretary of State has taken into account the Inspector's comments that the emerging plan is at an early stage, and no party relied on it for these applications (IR6.2). He has also taken into account that the Statement of Common Ground between the applicant and LBTH<sup>10</sup>, in which parties agreed that the following previous Regulation 19 consultation the draft Local Plan was expected to be submitted for examination in March 2025 and that the draft Local Plan and its policies should be given no weight. An early stage consultation calling for evidence and experience has also been undertaken towards a new London Plan.
30. Paragraph 49 of the Framework states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there are unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to the policies in the Framework. As the emerging Local Plan is at an early stage the Secretary of State gives it little weight, and as the new London Plan is at a very early stage the Secretary of State gives it no weight.

#### **Main issues**

##### Heritage assets

31. For the reasons given at IR13.35-13.41, the Secretary of State agrees with the Inspector that the proposed works are underpinned by a clear understanding of the heritage attributes of the Grade II\* listed Johnson Smirke building (IR13.39). He agrees that while there would not be true reinstatement of the lost historic plan form, the works would be entirely consistent with the formality and prominence of historic state rooms behind the Georgian palace façade (IR13.40), and works to the exterior would be sensitive to its architectural significance, subject to conditions which would ensure that the detailed approach is appropriate (IR13.41).

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<sup>9</sup> Vienna Convention on Diplomatic Relations 1961 (Vienna Convention 1961) and the Vienna Convention on Consular Relations 1963 (Vienna Convention 1963), incorporated into domestic law through the Diplomatic Privileges Act 1964 (DPA 1964) and the Consular Relations Act 1968 (CRA 1968).

<sup>10</sup> INQ24 [INQ 24 - Signed and Agreed Statement of Common Ground, LBTH and Applicant .pdf](#) | Powered by [Box](#)

32. For the reasons given at IR13.42-13.47, the Secretary of State agrees that the minimal refurbishment works that are proposed to the remaining historic façades of the Grade II listed Seaman's Registry would be sensitive to the remaining historic fabric, and that the removal of the modern 1980s wall, which would allow the Seaman's Registry to once again be a freestanding structure within the forecourt areas of the site, would be a benefit (IR13.46). He further agrees that the replacement and reconfiguration of the existing 1980s structure would be more austere and less competitive than the 1980s treatments (IR13.47).

33. For the reasons given at IR13.48-13.54, the Secretary of State agrees that in terms of the Grade II listed Entrance Lodges, the replacement of the substation building with a new entrance pavilion has been carefully designed to ensure its subservience to the northern lodge with a simple architectural treatment and form (IR13.51), and that the relocation of the Seaman's Registry portico represents a good reuse of this feature (IR13.52). He further agrees that the proposed works to the wall, involving refurbishment and retention with some rebuilding and alterations along East Smithfield and Mansell Street, would be sympathetic and appropriate to this structure (IR13.54).

34. The Secretary of State notes that the site lies within an area of designated archaeological importance within the development plan (IR13.55). For the reasons given at IR13.55-13.64, he agrees with parties that the remains of the Black Death Cemetery and St Mary Grace's Abbey are of comparable significance to a scheduled monument (IR13.55), and that there is significant potential for other medieval, post medieval and modern finds. He agrees that the proposals would conserve the full extent of the ruins of the Cistercian Abbey (IR13.59) and has taken into account that the former Abbey kitchen area, along with the ruins currently exposed to the elements, would form part of the Heritage Interpretation Centre ((HIC), also referred to as the Pavilion or Cultural Exchange Building), and would be visible and accessed via Exchange Square, which would be set at basement level to facilitate public views of the remains (IR13.60).

35. In assessing the risk of physical impact to archaeological assets from demolition and other works, the Secretary of State has taken into account the views of Historic England (HE) and the Greater London Archaeological Advisory Service (GLAAS) who identify a low level of less than substantial harm but who state this would be mitigated and offset by benefits from the conservation of the ruins and the HIC (IR13.62). He has also considered the applicant's position which acknowledges the potential for harm, and considers that if it occurred, it would be at a very low level (IR8.7). The Secretary of State agrees that on the basis of the evidence before him, should any harm occur during the construction phase of the development, this could only ever be a very low level (IR13.63). Overall, he considers there is potential for a very low level of less than substantial harm to the archaeological remains, and given his above conclusion on the assets' significance, and taking into account paragraph 212 of the Framework, he gives this great weight. He has carried out the balancing exercise in paragraph 215 of the Framework at paragraph 125 below. As a result of this potential for harm, he identifies slight conflict with THLP Policy S.DH3. The Secretary of State agrees with the Inspector that the Cistercian Abbey ruins and their setting would be improved by the HIC as this would reveal their significance to the public for the first time and allow for their appreciation, representing a substantial enhancement to these assets and a benefit of the scheme (IR13.64).

36. The Secretary of State agrees with the Inspector that the assets set out above have a distinct group value which contribute to their significance. For the reasons given at IR13.65-13.70, he agrees that Embassy House would have an elegant composition and would be a considerable improvement on the current poor-quality façades, with the set-back of external glazing and the creation of balconies offering visual relief, and the increased height mitigated through its design (IR13.68). He further agrees that the Cultural Exchange building would present a much-improved arrangement which would have a distinct quality in the proposed architectural language and the treatment of façades with high-quality materials (IR13.69). He further agrees that the landscaping proposals would enhance the setting, with the proposed Exchange Square being a significant enhancement to the currently unattractive 'dead space', improvements to the public realm from

the pavement works outside the lodges, and sympathetically designed hostile vehicle mitigation measures (IR13.70).

37. For the reasons given at IR13.71-13.78, the Secretary of State agrees that the creation of Embassy House and the Cultural Exchange building would represent a marked improvement to the Royal Mint site and would present a better backdrop when looking out from the Tower of London (ToL) towards the site (IR13.77). He considers that overall the significance of ToL World Heritage Site (WHS) as derived from its setting would be enhanced (IR13.78).
38. For the reasons given at IR13.79-13.80, the Secretary of State agrees that there would be no effect on the Grade I listed Tower Bridge, and for the reasons given above and at IR13.81 he agrees that there would be no harm to the ToL Conservation Area (CA).
39. He further agrees at IR13.88 that the special interest, the Outstanding Universal Value (OUV) and the character and appearance of the heritage assets discussed above would be preserved and enhanced. For the reasons set out above, he gives substantial weight to the collective benefits to the above-ground designated heritage assets and the enhancement to the Cistercian Abbey ruins and their setting.
40. The Secretary of State agrees at IR13.87 that strictly speaking, the proposed development does not comply with LP Policy D9b as the site has not been specifically identified in THLP as suitable for a tall building. The supporting text to THLP Policy D.DH6 (paragraph 8.64) indicates that any building of more than 30 metres will be considered to be a tall building. The Secretary of State notes that under this definition, the existing Johnson Smirke building, Seaman's Registry and Murray and Dexter Houses all meet the definition of a tall building. Taking into account the relatively limited extent of the increases in height as a result of the conversion of Murray and Dexter House to Embassy House,<sup>11</sup> the care which has been taken to reduce the impact of the proposal on views,<sup>12</sup> and his conclusions on heritage impacts as set out at paragraphs 31-39 above, he agrees with the Inspector that the proposal would meet the criteria for tall building development set out in D9c and would accord with the policy emphasis of policy D9 as a whole (IR13.87). With the exception of slight conflict with THLP Policy S.DH3 as identified at paragraph 35 above, for the reasons given at IR13.88-13.89 he agrees that the proposals would fully accord with the suite of heritage policies within the LP and THLP, as well as the statutory duties under sections 16(2), 66(1) and 72(1) of the LBCA 1990.

#### *Listed building consent*

41. The Secretary of State notes that the broad consensus, including from HE, is that the development and works would represent an improvement to the site within the sensitive backdrop to the ToL WHS and other important heritage assets (IR13.32). He further notes it is uncontested between LBTH and the applicant that the works proposed in the listed building consent application would preserve the buildings and their special interest and thus should also be approved (IR13.231). For these reasons, taking into account his conclusions on specific impacts to listed buildings and their settings above, and having regard to the duties within the LBCA 1990 as set out at paragraph 27 above, the Secretary of State considers that listed building consent should be approved.

#### Healthy and safe communities and highway safety

##### *Protest activity, highway safety and traffic*

42. The Secretary of State has carefully considered the Inspector's assessment of highway safety and protest management as set out at IR13.90-13.124.<sup>13</sup> He agrees with the Inspector's analysis

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<sup>11</sup> CD1.03C p75 B3b\_16\_10, and p76 B3b\_16\_11 [CD 1.03C - Proposed Drawings.pdf | Powered by Box](#)

<sup>12</sup> CD7.07 p316 [CD 7.07 - Design and Access Statement V2.pdf | Powered by Box](#)

<sup>13</sup> The Secretary of State notes that references to 'PDCA' in IR13.101 and IR13.106 should be to 'PCLA'.

and general approach as set out at IR13.90-13.100.

43. The Secretary of State notes that a Pedestrian Comfort Level Assessment (PCLA)<sup>14</sup> was submitted by the applicant as part of the original application in 2022 (IR3.3-3.4), and was subsequently updated for the inquiry.<sup>15</sup> These documents considered the areas discussed by the Inspector in IR13.101-13.108.
44. Following the LBTH planning committee meeting on 9 December, the 2022 PCLA was provided to the MPS. The MPS confirmed in a post-inquiry letter to the Rt Hon Iain Duncan Smith MP<sup>16</sup> that, triggered by the provision of the 2022 PCLA, the MPS undertook a detailed specialist assessment. The Secretary of State notes that the MPS had originally maintained an objection to the proposal (see also paragraph 9 above); however, it confirmed to LBTH by email on 8 January 2025 that its objection had been removed, stating: 'the MPS's Public Order experts are content that, on balance, there is sufficient space for future protests to be accommodated without significantly impacting the adjacent road network.'<sup>17</sup>
45. At the inquiry, the MPS gave evidence that a density of 2 people per sqm was the appropriate standard and that the MPS had identified an area of 272sqm as a realistic area where protest activities would occur, which would fit around 500 protesters (IR13.104). Following this evidence, a Transport Clarification Note (TCN) was produced by the applicant, at the Inspector's request.<sup>18</sup> This accepted the MPS's position at inquiry that based on the MPS's experience, protesters would not use the whole of the pavement space and would be likely to base themselves closer to the front of the site by the main site entrance,<sup>19</sup> and provided an illustration of a 272sqm area.<sup>20</sup> The Secretary of State agrees with the Inspector that the MPS is the authority which is experienced in protest management and is best placed to give a realistic evaluation. He agrees with the MPS's position in terms of the site area, density and resultant capacity at the site for protests (IR13.109), and with the Inspector at IR13.116 that on balance, the ability of the site to accommodate around 500 protestors with no undue effect on the highway network is reasonable. He notes that the applicant accepted this position.<sup>21</sup>
46. The Secretary of State has noted that interested parties have raised the issue of the potential size of future protests, and have questioned the suitability of the site to accommodate larger protests.<sup>22</sup> He agrees with the Inspector that the site is located on a very busy part of the strategic highways network which carries high volumes of traffic, and as such, protest activity which spilled onto the streets could cause significant disruption. In this respect he notes that Transport for London (TfL) advised that the protest at the site on 8 February 2025 had a serious impact (IR13.110). He further notes the MPS's comment that the location of the site means that it may require more police resource than other similar embassy locations (IR13.111), and that the MPS 'continue to have residual concerns should there be an escalation of the historic scale of protest including in relation to the impact on policing resources and traffic management'.<sup>23</sup>
47. While the MPS's concerns, and those of objectors, are understandable, the Secretary of State also agrees with the MPS's position that 'the location of the Royal Mint site means that large-scale protests...are able to be policed safely, balancing the rights of protestors with the local

<sup>14</sup> CD1.33 [CD 1.33 - Pedestrian Comfort Level Assessment \(made publicly available 23.01.25\).pdf | Powered by Box](#)

<sup>15</sup> CD11.07 [CD 11.07 Applicant PoE - Transport.pdf | Powered by Box](#)

<sup>16</sup> Circulated to parties on 6 August 2025 as part of the Secretary of State's reference back exercise – see paragraph 14 above and Annex A of this letter.

<sup>17</sup> Appendix 2 of CD9.08 [CD 9.08 LBTH Proof of Evidence Planning 17.01.2025 .pdf | Powered by Box](#)

<sup>18</sup> INQ25 [INQ 25 - Transport Clarification Note.pdf | Powered by Box](#)

<sup>19</sup> INQ25, para. 2.2.1

<sup>20</sup> INQ25, Figure 1

<sup>21</sup> INQ25

<sup>22</sup> For example, the post-inquiry representation from the Rt Hon Iain Duncan Smith MP dated 18 June 2025 which enclosed a letter from the Metropolitan Police Service (MPS) dated 10 April 2025, as referenced at paragraph 14 above.

<sup>23</sup> CD12.186 [CD 12.186 MPS Response to R. Jenrick Letter 10.02.25.pdf | Powered by Box](#)

community and road users'.<sup>24</sup>

48. The Secretary of State notes that protests are common across London and the MPS is highly experienced. The MPS has stated: '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.'<sup>25</sup> The Secretary of State has confidence in the MPS's ability to manage any future protests safely and effectively, balancing the rights and interests of all concerned. While he accepts that should there be large scale protest activities occurring, the location of the site would have potential to cause severe disruption to the highway network (IR13.114), that is not unique to this location, and is a common position when protests are held.
49. For the reasons given at IR13.117-13.121, the Secretary of State agrees that the risk of disruption from protest activity to those living directly adjacent to the site are limited (IR13.119), and that the risks of disruption to local residents more broadly would likely be occasional, and not at a level which would justify the refusal of the proposed use at the site on such grounds (IR13.120). He has further taken into account the proposed mitigation measures (IR13.122-13.123).
50. Overall, the Secretary of State agrees with the Inspector at IR13.124 that, while it is accepted that protest activities would be likely to occur at the site, the impacts would be appropriately managed to reduce their effects on the highway network as well as on the local residents. He agrees that there would be no policy conflict arising from the proposals in this regard, and does not consider that the impact of protest activities is a matter which would justify a refusal of permission in this case.
51. The Secretary of State has taken into account the concerns which have been expressed by interested parties, and the residual concerns which have been expressed by the MPS in respect of larger protests. He considers that while it is difficult to estimate the size and frequency of future protests (IR13.98), there is some potential for disruption arising from any future larger protests (i.e. those comprising 500+ protestors). In the light of the uncertainties around the likelihood, scale or frequency of future protests, it does not change his overall conclusions on this matter or his conclusion in paragraph 52 below. However, he considers that the potential for disruption arising from any future larger protests carries moderate weight against the proposal. In reaching his conclusions, he has taken into account that the public are generally expected to tolerate a degree of disruption from lawful protest.<sup>26</sup>

#### *Other highway safety considerations*

52. For the reasons given at IR13.125-13.135, the Secretary of State agrees that in terms of trip generation, the proposal is unlikely to generate any significant impacts on the road network, subject to on-going site management (IR13.127), and further agrees with the Inspector's conclusions on conditions at IR13.133-13.134. Overall, he agrees that there would be no harm arising from the proposals in respect of highway effects, and no policy conflict in this regard (IR13.135).

#### *Other security considerations*

##### *Terrorism and crime*

53. The Secretary of State acknowledges the concerns which have been raised on behalf of neighbouring residents about the potential threat from terrorism arising from the proposed embassy use, the evidence which has been put forward in the Security Report undertaken for

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<sup>24</sup> Ibid.

<sup>25</sup> Letter from the Metropolitan Police Service (MPS) to Iain Duncan Smith MP, dated 10 April 2025, as referenced at paragraph 14 above.

<sup>26</sup> *Somanji Hotels Ltd v Epping District Council*.

RMCRA, and the differing views on these matters (IR13.136-13.138). He notes that at the heart of the disagreement between the parties on this issue was the level of threat that the proposed embassy poses and the resultant effects on neighbouring residents (IR13.138). He recognises that at the Inquiry the parties sought to discredit each other in terms of expertise and methodology (IR13.138), and further notes RMCRA's letter of 22 December 2025 regarding the weight to be attached to the applicant's expert evidence.

54. The Secretary of State agrees with the Inspector that terrorist attacks are serious, devastating the lives and communities affected by them, and it is right to consider this matter seriously (IR13.139). However, he also agrees with the Inspector that whether or not a specific threat would arise from the proposed use of the site is somewhat academic because the threat to the UK from terrorism is currently assessed as being 'substantial', meaning an attack somewhere in the UK is likely (IR13.139).
55. The Secretary of State considers that the potential for a terrorist threat is material to the decision in this case. He has taken into account that the MPS has not objected in respect of terrorism concerns, and that FCDO/HO have also not raised any objections relating to terrorist activities (IR13.143). The Secretary of State notes that those bodies have particular expertise and responsibility in terms of counter terrorism and places significant weight on their not having objected on this issue.
56. The Secretary of State agrees with the Inspector that should there be a terrorist attack, neighbouring residential properties, in particular those at St Mary Grace's Court, would be vulnerable. However, he also agrees that, by their nature, terrorist attacks are indiscriminate in their nature and have far reaching and deadly consequences (IR13.141).
57. The Secretary of State has also taken into account the planning policy approach set out in the Framework, which refers to appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security, and the LP (IR13.140 and 13.144). He agrees that fundamentally the policy basis relates to design matters and designing out crime and reducing risk, and further notes that the Designing Out Crime Officer for the MPS has not raised any objections (IR13.145).
58. The Secretary of State has taken into account the broader national risks of a terrorist attack; the lack of evidence of a specific identified terrorist threat to the proposed use; the absence of an objection from bodies responsible for counter terrorism; and the security measures which would be put in place (see paragraph 59 below). For the reasons set out above, he considers that while the threat of terrorism is undoubtedly a serious matter which he has taken into account in reaching his decision, in the circumstances of this case it does not weigh against the decision.

#### Security measures

59. The Secretary of State has taken into account the mitigation measures for safety and security as set out at IR13.146-13.152. These include: bollards, planters, CCTV and street lighting (IR13.146); the Events Management Plan (EMP) (IR13.147); limited public access (to areas other than Exchange Square) and security measures at access points (IR13.148); replacement of a wooden fence to the rear of the site and security measures to the undercroft of St Mary Grace's Court (IR13.149); and the fire safety documents (IR13.151 and paragraph 101 below). Access to Exchange Square and the HIC are addressed further at paragraphs 63-74 below, and fire matters are addressed further at paragraphs 100-102 below.
60. The Secretary of State has taken into account representations on this matter including the concerns of RMCRA regarding the opportunity to review security arrangements. Taking into account his conclusions at paragraph 17 above, he agrees with the Inspector that the package of security measures proposed would be proportionate to the proposed use of the site (IR13.156). He further agrees that bringing a vacant and derelict site back into use, combined with the above measures, is likely to create a safer environment in the surrounding areas around the site, and

could reduce crime (IR13.152). The Secretary of State agrees that the policy objectives set out in LP policy D11 and paragraphs 102 and 135(f) of the Framework would be met.

#### Telecommunications cables

61. As set out at paragraph 10 above, the Secretary of State does not consider that general national security concerns arising from the identity of the applicant alone are a material planning consideration. However, in so far as the national security concerns arise out of, or relate to, the development proposed, he considers that such matters are capable of being material planning considerations. Several parties have raised concerns about the potential sensitivity and security risks to telecommunications cables associated with the Wapping Telephone Exchange, which is between the Seaman's Registry and Dexter House, but outside the red-line boundary of the site. The Secretary of State considers that given the concerns that sensitive cabling runs close to or under the site, this matter is a material planning consideration in this case.
62. There is no suggestion that the operational development permitted by any grant of planning permission would interfere with the cables, nor that a lawful embassy use of the site would give rise to any such interference. He notes that no bodies with responsibility for national security, including HO and FCDO, have raised concerns or objected to the proposal on the basis of the proximity of the cables or other underground infrastructure. He considers that the lack of objection from these bodies on this issue carries significant weight. He further notes that this matter has not been raised by the owner and operator of the cables. In light of the above, he does not consider that the generalised concerns which have been raised about these cables are a reason to refuse planning permission, or that this matter weighs against the proposal. Furthermore, the Secretary of State notes that any concerns relating to unlawful or improper activity by a foreign state are capable of being addressed by the Foreign Secretary exercising his functions under the DCPA 1987 and the Vienna Conventions.

#### *FCDO/HO comments*

63. In their joint representation of 14 January 2025, the HO/FCDO made a number of detailed comments in respect of public access and security provision at the HIC and Exchange Square (IR13.153-13.155).<sup>27</sup> As set out in paragraph 14 above, the Secretary of State sought further information on these matters on 6 August 2025.

#### Public safety in Exchange Square

64. One of the concerns raised by the FCDO related to a publicly accessible area within the embassy estate immediately adjacent to the highway, known as Exchange Square. The concern raised by the FCDO was that should a security or medical emergency occur within this area, the consent of the Head of Mission would be required before access could be achieved (under Article 22 of the Vienna Convention 1961).
65. In a Note Verbale (D065/25) dated 18 March 2025 the applicant provided an assurance that it would 'not...claim diplomatic inviolability for this area, with a view to providing UK personnel carrying out official duties including police and medical staff with access to this area'. The FCDO withdrew its concern following this assurance, explaining in a letter dated 20 August 2025 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.'
66. The Secretary of State has given regard to objections to this proposed arrangement by parties, including submitted legal opinions/notes prepared on behalf of RCMRA dated 6 September 2025, and on behalf of Friends of St. Katharine Docks (FOSKD) dated 20 August 2025 and 8 September 2025. Following a request from the Secretary of State for clarification, on 12 January

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<sup>27</sup> CD12.02 [CD 12.02 Letter from the Foreign Secretary and the Home Secretary \(14.01.2025\).pdf](#) | Powered by [Box](#)

<sup>27</sup> INQ28, paras

2026 FCDO confirmed that consent had been granted in 2018 under s.1 of DCPA 1987 for Royal Mint Court to be deemed as diplomatic premises for use by the PRC. Originally this consent included the area known as Exchange Square. However, the FCDO has confirmed that diplomatic consent has since been withdrawn in respect of Exchange Square such that it 'is not covered by diplomatic consent and inviolability cannot apply to it'.

67. In considering public safety in Exchange Square, the Secretary of State has taken into account FCDO's confirmation that Exchange Square is not included in the area for which consent under s.1 of the DCPA 1987 has been granted, and the commitment made by the applicant that inviolability will not be claimed for this part of the site, i.e. that consent will not be sought under the DCPA 1987 in respect of Exchange Square. This means that emergency services would be able to access Exchange Square without the need for permission from the Head of Mission. While he accepts that the applicant's commitment not to seek inviolability for this area is revocable, the grant of consent under the DCPA is a matter for FCDO. The applicant cannot unilaterally change the status of Exchange Square. On this basis the Secretary of State is content that public safety in Exchange Square has been adequately addressed.
68. The FCDO/HO joint representation of 14 January 2025 originally suggested a hard perimeter by way of mitigation. A hard perimeter does not form part of the proposed development and is not the solution now proposed by FCDO/HO. For the avoidance of doubt, the Secretary of State does not consider that it would be necessary to adequately address concerns about public safety.

#### Public safety in the HIC

69. The HIC forms part of the embassy and will house the Cistercian ruins. It will be accessible by the public. It will also form part of the embassy's inviolable premises, and therefore access by emergency services would require the permission of the Head of Mission. In their joint representation of 14 January 2025, the HO/FCDO raised concerns that unregulated public access to the HIC would raise public safety risks and risks to the security of the embassy.
70. In its Note Verbale (D065/25) dated 18 March 2025 the applicant made an assurance that it 'will take necessary measures including regulating public access to the pavilion and performing security checks before entry'. In its representation of 20 August 2025, the applicant confirmed that the HIC would remain part of the inviolable area, and that while security checks would be a matter for the embassy, 'the details for public access to this area will be secured through the proposed Events Management Plan Condition, with the finer detail of these checks to be confirmed between the Chinese and UK authorities'.
71. On the basis of this assurance and noting that the applicant had agreed to work with Police partners, FCDO/HO withdrew their concern relating to the HIC in their letter of 20 August 2025. FCDO/HO consider the proposed resolution is an acceptable mitigation to their previous concerns, and provides consistency with measures required at other diplomatic estates. FCDO/HO stated that Police partners provided independent advice on the use of Police powers which assisted FCDO reaching this view, and that Police partners remain independent of the process. In its representation of 20 August 2025, the applicant confirmed that it considered that this issue has been resolved.
72. The Secretary of State has amended condition 35 in Annex B2 to require that the EMP shall provide details of the measures regulating public access to the HIC following consultation with FCDO on behalf of the UK Government and local emergency services.
73. Parties have expressed concerns that visitors to the HIC would be beyond the reach of help from UK emergency services, and have queried whether any condition attached to a grant of planning permission, including that concerning the HIC, would be enforceable. Parties have also raised concerns that public visitors to the HIC could unwittingly enter an area where they would not be fully protected under UK law, and that anyone wishing to access the historic ruins will be searched by Chinese police.

74. The Secretary of State notes that the need to manage the safety and health of nationals from other countries on embassy premises is not unique to this case, and has taken into account FCDO/HO's evidence that the approach set out above provides consistency with measures required at other diplomatic estates. The Secretary of State has further taken into account that the proposed mitigation, which will ensure that the public access to the HIC will be regulated, has resulted in FCDO/HO withdrawing their concern. He considers that it appropriately manages the potential risks. The question of planning enforcement in the context of diplomatic immunity is addressed at paragraphs 103-105 below.

#### Consolidation of premises

75. In their representation to the inquiry of 14 January 2025, FCDO/HO indicated that the application is made in part in order to achieve consolidation of the applicant's accredited diplomatic premises. The representation stated that the Secretary of State should not make a decision on this application until a firm plan is agreed on the consolidation of the Chinese diplomatic premises. This matter was raised by the Secretary of State in the reference back letter of 6 August.

76. Some parties commented on this matter. The applicant in its letter of 20 August stated that the issue of consolidation is being resolved through diplomatic channels, and stated its view that this is not a planning matter, and is not relevant to the Secretary of State's decision. FOSKD in its representation of 20 August stated that it is not clear how such consolidation is proposed to be secured, and that in the absence of an enforceable mechanism, it cannot properly be regarded as a benefit of the proposed scheme.

77. FCDO/HO reiterated their position that no decision should be made on the application until a firm plan is agreed on the consolidation of the Chinese diplomatic premises in their letter of 20 August 2025 and their request for an extension of time on 2 October 2025. In their letter of 27 November 2025, they confirmed that an arrangement had been reached, and that the Chinese Government has committed to consolidate all currently accredited diplomatic premises in London (excluding the Ambassador's residence) into one site at the Royal Mint Court (subject to planning approval). Accordingly, they state that this outstanding issue is considered resolved.

78. The Secretary of State agrees with the applicant's position. The representations of FCDO/HO on this matter do not raise any land use issues and therefore the consolidation of the applicant's diplomatic premises is not a planning matter in this case. He has not taken it into account in his consideration of the proposal.

#### *Other considerations*

##### Design and public realm improvements

79. The Secretary of State agrees with the Inspector at IR13.86 that in design terms, this is an exemplary scheme which promotes sustainable adaptive reuse while making considerable positive enhancements which correct the failures of a poor quality and damaging 1980s scheme. He further agrees at IR13.236 that as well as the improvements to the existing poor-quality buildings within the site, there would be wider improvements to the character and appearance of the area, including in terms of the public realm including footway enhancements, planting, lighting, public artwork, signage and funding for an Urban Realm study which would improve the immediate site surroundings. He agrees that this carries substantial weight.

##### Brownfield land

80. The Secretary of State agrees that the reuse of this brownfield site carries substantial weight (IR13.233).

## Sustainability

81. The Secretary of State agrees that the proposed development would be located in a highly accessible location, and is in line with the strategic function of the Central Activities Zone (CAZ). While he does not consider that policy accordance with the functions of the CAZ attracts separate weight, he considers that sustainability carries significant weight (IR13.237).

## Economic benefits

82. For the reasons given at IR13.237, the Secretary of State agrees that the economic benefits of the proposal carry limited weight.

## Support for diplomatic relations

83. The Secretary of State has considered the Inspector's conclusions at IR13.238. He considers that as PRC already hold consular premises in London, and as the specific identity of the applicant is not a material planning consideration unless it gives rise to specific land use considerations, the support to diplomatic and trading relations with PRC is not a material consideration and carries no weight. Unlike the Inspector, he considers the proposed development has no effect on London's standing as an international city.

## Living conditions

84. In terms of amenity for neighbouring properties, for the reasons given at IR13.157-13.160 the Secretary of State agrees there would not be a loss of privacy to the occupants of St Mary Grace's Court and future occupants of Embassy House (IR13.160). For the reasons given at IR13.161-13.163 he further agrees that there would be no effect upon living conditions of neighbouring residents in respect of noise and disturbance (IR13.161) and that taking into consideration the general level of compliance for daylight, the negligible impact on sunlight, and inherent design factors at St Mary Grace's Court and Royal Mint Gardens, the impacts would be minimal (IR13.163). He has further taken into account that condition 3 of Annex B2 controls construction hours, vibration and noise. He agrees that while there would be some minor impacts on living conditions, overall there would be general compliance with LP policy D6 and THLP Policy D.DH8 as well as other relevant amenity policies and NPPF130(c).

85. With regard to amenity for future occupants, the Secretary of State has reviewed the submitted plans referred to at paragraph 90a below, and has further taken into account the applicant's Design and Access Statement (DAS)<sup>28</sup> and LBTH's assessment of ancillary accommodation in the Committee Report of 9 December 2024.<sup>29</sup> The DAS confirms at p.325 that all units will have access to private amenity space in the form of balconies, and that the design of the accommodation units is compliant with Part M (4)2 of Schedule 1 to the Building Regulations 2010, with 5% of the units (ten) compliant with Part M (4)3. LBTH considered (paragraph 7.12 of the Committee Report) that the staff accommodation units would broadly be in line with internal space standards for conventional housing although there may be some shortfalls, noting that ancillary staff accommodation is not required to comply with nationally described space standards for conventional housing units, although the broad compliance is a good indication of satisfactory design quality. The Secretary of State has taken this into account and has noted the slight shortfall for 1-bed and some smaller 2-bed units as well as the generous proposed floor-to-ceiling heights. Overall, he considers that, for the proposed use, the accommodation would be of an acceptable size.

86. While the 3 bedroom units are dual aspect, the Secretary of State has taken into account that the smaller units are not, resulting in some policy conflict with LP Policy D6 and THLP Policy D.DH8. He has also taken into account the LBTH assessment of daylight and sunlight for occupants of the site, as well as the Internal Daylight and Sunlight report, submitted since the planning

<sup>28</sup> CD7.07 [CD 7.07 - Design and Access Statement V2.pdf | Powered by Box](#)

<sup>29</sup> CD9.04 [CD 9.04 LBTH OFFICER REPORT 09.12.24.pdf | Powered by Box](#)

committee meeting.<sup>30</sup> He notes that 80% of habitable rooms assessed would satisfy strict application of daylight guidelines, and 46% would satisfy sunlight guidelines. He also notes that there are a number of limiting factors to daylight adequacy for this site and proposed scheme including the proximity of neighbours, retention of existing building structure and the proposed external balconies. In the specific circumstances of this case, the Secretary of State agrees with the LBTH's conclusion at paragraph 7.19 that, taking into consideration the nature of the staff and visitor accommodation, specifically for embassy staff for limited periods of time, the specialist accommodation would be of a sufficient quality, in accordance with THLP policy D.H4.

87. The Secretary of State notes the LBTH conclusion (paragraph 7.18 of the Committee Report) that the internal courtyard amenity space would comply with sun-on-the-ground guidance, and there would be an improvement in these terms on the existing situation. He has also taken into account that conditions 20 and 34 of Annex B2 provide for an overheating strategy and mechanical ventilation (IR13.187 and IR13.198). The Secretary of State has also concluded at paragraph 84 above that there would be no loss of privacy to future occupants of Embassy House. Overall, he considers that he has sufficient information to conclude that the amenity of occupants will be acceptable, and is in overall compliance with the relevant policies given at IR6.35.

#### Public Sector Equality Duty

88. For the reasons given at IR13.165-13.167, the Secretary of State agrees that the proposal would not have a materially adverse effect on, or discriminate against, those with a protected characteristic (IR13.167). He further agrees with the Inspector's approach at IR13.168. The Secretary of State has kept this matter under review following evidence received after the inquiry. Post-inquiry representations have not changed his conclusion (IR13.167).

#### Drawings<sup>31</sup>

89. In response to the previous Secretary of State's reference back letter of 6 August 2025, the applicant submitted a revised set of drawings (letter of 20 August 2025) along with a legal opinion dated 19 August 2025. Revised versions of 43 drawings were provided along with a Consolidated Drawing Schedule. These are attached at **Annex C**. For clarity, these revised drawings are marked with a single asterisk at condition 2 in Annex B1 below, and conditions 2 and 23 in Annex B2 below. The applicant states that these drawings have been consolidated to match the extra information given by the architect during the inquiry, and do not contain new information.

90. The applicant identified four drawings relating to proposed roof plans<sup>32</sup> which it stated had been wrongly marked as redacted originally<sup>33</sup>. It additionally identified five further drawings which it stated were unnecessarily listed as redacted in the original drawing register, and which it stated remain unchanged for the following reasons:

- a) B3b\_P21\_11<sup>34</sup> and B3b\_P21\_12<sup>35</sup> Proposed staff accommodation layouts, Embassy House – The current drawings provide sufficient information, including the area of the housing and the functional arrangements such as furniture placement.<sup>36</sup>

<sup>30</sup> CD7.21 [CD 7.21 - Internal Daylight Sunlight V2.pdf | Powered by Box](#)

<sup>31</sup> To note: some parties refer to 'plans' and some to 'drawings'. For the purposes of this section, there is no difference in meaning.

<sup>32</sup> CD1.03C p7, p24, p45 and [CD 1.03C - Proposed Drawings.pdf | Powered by Box](#) and CD7.22 [1510\\_A\\_B4-11\\_11\(704775963.1\).pdf | Powered by Box](#)

<sup>33</sup> i.e in the Planning (Addendum 2) Drawing List dated 31 January 2025, CD7.22 [1510\\_Planning \(addendum 2\) drawing list\\_20250130\(704775964.1\).pdf | Powered by Box](#)

<sup>34</sup> CD7.22 [1510\\_A\\_B3b\\_21\\_11\\_Unit layouts\(704775961.1\).pdf | Powered by Box](#)

<sup>35</sup> CD7.22 [1510\\_A\\_B3b\\_21\\_12\\_Unit layouts\(704775962.1\).pdf | Powered by Box](#)

<sup>36</sup> The Secretary of State notes that references to B3b\_P21\_11 and B3b\_P21\_12 in the applicants response should be B3b\_21\_11 and B3\_P21\_12.

- b) B4\_11\_05<sup>37</sup> Location plan and B4\_11\_08<sup>38</sup> 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.
- c) B4\_11\_19<sup>39</sup> 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.

91. For clarity, the nine drawings which the applicant stated were wrongly marked as redacted and which remain unchanged are marked with a double asterisk at condition 2 in Annex B1 below and condition 2 in Annex B2 below.
92. Other parties raised concerns following the recirculation on 22 August of these revised drawings, including via a legal opinion dated 6 September produced on behalf of RMCRA and a legal note dated 8 September produced on behalf of FOSKD. Concerns included whether sufficient information had been provided on the use and layout of the buildings to enable a decision-maker to understand the scope of the use proposed and to properly assess the planning impacts.
93. The Secretary of State has carefully considered the parties' representations on this matter. As a starting point he notes that any planning permission and listed building consent would only be granted for the proposed development in accordance with the drawings in condition 2 of Annex B1 and condition 2 of Annex B2. He notes that of the 52 drawings which were originally marked as redacted, or listed as redacted in the drawing schedule, revised versions of 43 drawings have now been provided. Nine drawings from the original list in Annex A of the reference back letter of 6 August are unchanged, and no further versions of these drawings have been provided. He notes that no drawings are now marked as redacted, but has taken into account that the schedule to the applicant's response of 20 August variously states in respect of a number of drawings that: 'Use information for the smaller rooms/remaining rooms/ remaining spaces (areas with no public access) is not shown, which is however irrelevant to the planning.'<sup>40</sup> The Secretary of State has considered whether the drawings and other materials which are before him provide sufficient information to properly understand the development proposed and enable him to reach a conclusion on whether planning permission and listed building consent can be granted. In doing so, he has treated the application as being for a single composite development and has taken into account all elements of the proposal, even if in isolation some of those elements (such as the internal works) would not amount to development for the purposes of s.55 TCPA 1990.
94. In respect of staff accommodation, the Secretary of State has reviewed the drawings referred to at paragraph 90a above, and considers that they provide a sufficient level of information. His conclusions on amenity for future occupants are at paragraphs 84-87 above.
95. In respect of the location and site plans, and the masterplan for proposed works on Cartwright Street (referred to at paragraph 90b-c above), the Secretary of State considers that while details of internal rooms are not shown, that is not inappropriate where the planning purpose of the drawing is to deal with external matters.
96. The Secretary of State has considered the statements in the applicant's Consolidated Drawing Schedule that the use information which is not shown is irrelevant to planning. He considers that it cannot be said definitively that use information is by its nature irrelevant to planning and incapable of being a material consideration. However, neither does he consider that the absence of this information must automatically lead to a refusal of permission and/or listed building

<sup>37</sup> CD1.03C p86 [CD 1.03C - Proposed Drawings.pdf | Powered by Box](#)

<sup>38</sup> CD1.03C p87 [CD 1.03C - Proposed Drawings.pdf | Powered by Box](#)

<sup>39</sup> CD1.03C p92 [CD 1.03C - Proposed Drawings.pdf | Powered by Box](#)

<sup>40</sup> 24 drawings are characterised in this way; numbers 1-5, 7-12, 14-21, 23-26 and 52 in the schedule.

consent. The extent of its materiality to the decision will depend on the particular circumstances of the case.

97. The Secretary of State has reviewed the 24 plans which do not show use information for all rooms. He has also reviewed room use information provided in some cases on cross sectional drawings.<sup>41</sup> In the circumstances of this case, given the material which is before him, and the nature of the proposed embassy use, the Secretary of State does not consider that there is real as opposed to theoretical ambiguity as to what planning permission is sought for, or that it is impossible properly to understand the scope of the uses proposed.

98. The rooms for which no particular use is specified may only be used for any lawful embassy use. The Secretary of State has considered the potential planning impacts which could arise from the lawful use of these rooms. He considers that if rooms other than those specifically identified as being for staff or visitor accommodation were used for overnight accommodation, this could give rise to materially harmful impacts in terms of amenity, accessibility and fire safety, which have not been assessed. He considers it is appropriate to impose a condition preventing this, and has accordingly amended condition 31 in Annex B2. The representations received on this issue raise generalised concerns about the potential use of these rooms which he has taken into account. Other than the issue of staff and visitor accommodation, he does not consider that any lawful embassy use of the unmarked rooms would give rise to material adverse planning impacts.

99. Overall, for the reasons set out above, the Secretary of State considers that he has sufficient information before him to grant planning permission and listed building consent. Development in compliance with the drawings is secured via condition 2 of Annex B1 and condition 2 of Annex B2. The question of planning enforcement in the context of diplomatic immunity is addressed at paragraphs 103-105 below.

#### Fire safety

100. The representation from FOSKD dated 16 December 2025 raised concerns regarding fire safety. It referred to discussions during the inquiry as to whether the applicant would use UK Building Regulations or Chinese codes and standards for internal areas, and whether any conditions would be enforceable. FOSKD also referred to comments provided to LBTH by the London Fire Brigade (LFB), and suggested that the LFB had insufficient information on which to make an assessment.

101. The Secretary of State notes that for internal areas, the Vienna Conventions allow for a country to choose to adopt UK standards or other equivalent standards (IR8.62-8.65, IR13.171). However, he has given regard to the changes made to the scheme based on UK fire regulations, as set out at section 4.8.2 in the Statement of Common Ground.<sup>42</sup> He has also taken into account the agreement between the applicant and LBTH at section 9.3 of the Statement of Common Ground that the submitted Fire Safety Statement<sup>43</sup> and additional improvements meet the requirements of LP Policy D12 and relevant Regulations, and compliance would be secured by planning condition.<sup>44</sup> He has taken into account further design alterations made to the scheme to secure compliance with UK fire safety standard BS 9991:2024.<sup>45</sup> The Secretary of State agrees

<sup>41</sup> CD1.03C [CD 1.03C - Proposed Drawings.pdf | Powered by Box](#) p8 B1\_p16\_10, p9 B1-\_P16\_11, p10 B1-P16\_12, p25 B2- P16\_10.

<sup>42</sup> INQ24 [INQ 24 - Signed and Agreed Statement of Common Ground, LBTH and Applicant .pdf | Powered by Box](#)

<sup>43</sup> i.e. the Fire Statement (CD7.22).

<sup>44</sup> The Inspector states at IR13.151 the 'fire strategy' would be subject to condition. The Secretary of State notes that the document to be secured in the Inspector's proposed planning condition 19 (condition 19 of Annex B2) is the Fire Statement (CD7.22, CDL-P4-XX-RPT-FE-0003 P02, 31 January 2025). The introduction to the Fire Statement sets out that it aims to provide an abridged version of a Fire Strategy, with matters including compliance with Building Regulations addressed in more detail in the submitted Fire Strategy Report (CD7.17, CDL-P4-XX-RPT-FE-0002 P04, 22 November 2024). The Secretary of State considers that both documents should be secured via this condition, and has amended it accordingly.

<sup>45</sup> CD7.22 [CD7.22 - Design Alterations Required to Secure Compliance with BS 9991](#)

with the Inspector at IR13.151 that the applicant has clearly demonstrated its commitment to ensuring fire safety and agrees there is no reason to believe that the fire safety documents, which would be subject to condition, would not consider safety for all affected. The enforceability of conditions is considered at paragraphs 103-105.

102. The Secretary of State has taken into account that the LFB provided general advice on the planning application, which noted the greyed out areas on plans, but did not object to the proposals. Taking into account his conclusions at paragraph 98 above, his imposition of a condition preventing areas which are not specifically identified as being for residential use being used for overnight accommodation, and the fact that the scheme will be implemented in accordance with the Fire Statement and Fire Strategy, the Secretary of State considers that the application makes adequate provision for fire safety.

#### Planning enforcement

103. The Secretary of State acknowledges that the immunity and privileges applicable to the applicant, its diplomatic premises and its officers to some extent curtails the traditional options for enforcing breaches of planning control. However, he does not consider that planning control in respect of the proposed development, or diplomatic premises generally, to be effectively unenforceable. Nor does he accept the apparent suggestion made in some of the representations that attaching any planning condition to a grant of planning permission for an embassy would be ineffective and unlawful.

104. Immunity does not affect the lawfulness of an act, and inviolability of diplomatic premises does not confer or imply exception from local laws or regulations. The Secretary of State expects States, including the PRC, to abide by the terms of any grant of planning permission, including its conditions, and notes that Article 41 of the Convention on Diplomatic Relations places an obligation on 'all persons enjoying such privileges and immunities to respect the laws and regulations of the receiving State'. Where States contravene such laws and regulations, there are applicable remedies under the Vienna Conventions including declaring the head of the mission or member of the diplomatic staff persona non grata (Article 9) or, in extremis, severing diplomatic relations.

105. The Secretary of State has taken into account that the applicant has sought planning permission and listed building consent, and has participated constructively in the process. In his view this demonstrates the applicant's willingness to engage appropriately with requirements under the planning system. Overall, he considers that the inevitable limits on planning control in this case, which are common to all diplomatic premises, do not constitute a reason for refusing planning permission in this case.

#### Homes at St Mary Grace's Court

106. RMCRA in its representation of 23 December 2025 raised concerns that homes at St Mary Grace's Court would be demolished and existing residents would be required to move out. The Secretary of State notes that this decision relates only to application refs PA/24/01229/A1 and PA/24/01248/NC, dated 15 July 2024. The extent of the works for which planning permission and listed building consent is being granted is set out in the drawings secured in condition 2 of Annex B1 and condition 2 of Annex B2.

#### Planning conditions

107. The Secretary of State has had regard to the Inspector's analysis at IR12.1-12.2 and IR13.169-13.203, the recommended conditions set out at the end of the IR and the reasons for them, and to national policy in paragraph 57 of the Framework and the relevant Guidance. He has taken into account the outstanding areas of dispute, including relating to the interaction between planning conditions and the Vienna Conventions, discussed at IR12.1-12.2, IR13.169-13.175, IR13.178, IR13.192 and IR13.196-13.197.

108. The Secretary of State has made a number of amendments and additions to the Inspector's proposed conditions. (1) A double negative has been removed from Condition 28 in Annex B2. (2) Conditions 25 and 26 in Annex B2 have been amended in order to secure implementation of these matters prior to first occupation of the development, while condition 35 in Annex B2 has been amended to ensure that the measures set out in the EMP are retained. (3) Condition 31 in Annex B2 has been amended as set out in paragraph 98 of this letter. (4) Condition 32 of Annex B2 has been amended to make reference to the relevant drawing, for clarity. (5) Condition 35 in Annex B2 has been amended as set out in paragraph 72 of this letter. (6) In line with *R. (on the application of Midcounties Co-operative Limited) v Wyre Forest DC [2009] EWHC 964 (Admin)*, the proposed tailpieces have been deleted from conditions 10, 19, 28 and 29 of Annex B2. (7) References to plans numbered 1510\_A\_B3a\_31\_02, 1510\_A\_B3a\_31\_03, 1510\_A\_B3a\_31\_05, 1510\_A\_B3a\_31\_06, 1510\_A\_B3a\_31\_11, 1510\_A\_B3a\_31\_12, 1510\_A\_B3a\_31\_13, 1510\_A\_B3a\_31\_14, 1510\_A\_B3a\_31\_15, 1510\_A\_B3a\_31\_16, 1510\_A\_B3a\_31\_18, and 1510\_A\_B4\_31\_01, which appeared in the planning permission set of conditions in Annex D of the IR, have been removed and do not appear in condition 2 of Annex B2, following confirmation from the applicant via the Planning Inspectorate that these were erroneously included in a plan schedule and were never submitted. (8) Minor amendments to drawing names have been made in condition 2 in Annex B1 and condition 2 in Annex B2 to match drawings included in CD1.03B, CD1.03C, CD7.05 and CD7.22 and plans sent by DP9 in response to reference back letter of 6 August 2025.<sup>46</sup>

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46

ORIGINAL DRAWING NAMES IN ANNEX D OF THE IR	AMENDED DRAWING NAMES IN ANNEXES B1 AND B2
<b>Condition 2 Listed Building Consent</b>	
1510_A_B1-_PD6_11 Demolition North and South Elevation – Johnson Smirke Building	1510_A_B1-_PD6_11 Demolition section DD – Johnson Smirke Building
1510_A_B1-_PD7_11 Demolition section GG	1510_A_B1-_PD7_11 Demolition North and South Elevation - Johnson Smirke Building
*1510_A_B2-_P11_09 Proposed basement floor plan - Seaman's Registry Building Rev 01	*1510_A_B2-_P11_09 Proposed basement plan - Seaman's Registry Building Rev 01 -
**1510_A_B2-_P11_15 Demolition roof floor plan - Seaman's Registry Building	**1510_A_B2-_P11_15 Proposed roof floor plan - Seaman's Registry Building
1510_A_B4-_PD1_22 Proposed works – Lamp posts	1510_A_B4-_PD1_22 Proposed works - Lamp posts Masterplan
<b>Condition 2 Planning Permission</b>	
1510_A_B1-_PD6_11 Demolition North and South Elevation – Johnson Smirke Building	1510_A_B1-_PD6_11 Demolition section DD – Johnson Smirke Building
1510_A_B1-_PD7_11 Demolition section GG	1510_A_B1-_PD7_11 Demolition North and South Elevation - Johnson Smirke Building
1510_A_B3ab_D7_14 Demolition elevation 3 - Murray Dexter House South	1510_A_B3ab_D7_14 Demolition elevation 5 - Murray Dexter House South
1510_A_B3ab_D7_15 Demolition elevation 4 - Murray Dexter House West	1510_A_B3ab_D7_15 Demolition elevation 6 - Murray Dexter House West
1510_A_B4-_D7_10 Demolition - unfolded boundary wall	1510_A_B4-_D7_10 Demolition - unfolded boundary wall masterplan
1510_A_B4-_D7_18 Demolition - subway station	1510_A_B4-_D7_18 Demolition - subway staircase masterplan
1510_A_B4-_D7_19 Demolition - eastern boundary wall	1510_A_B4-_D7_19 Demolition - elevation eastern boundary wall masterplan
1510_A_B4-_D7_21 Demolition elevations - Substation/entrance	1510_A_B4-_D7_21 Demolition elevations - Substation/entrance masterplan
1510_A_B4-_D7_22 Demolition elevations - masterplan	1510_A_B4-_D7_22 Demolition elevations - Historic Lodges masterplan
**1510_A_B2-_P11_15 Demolition roof floor plan - Seaman's Registry Building	**1510_A_B2-_P11_15 Proposed roof floor plan
1510_A_B3a_17_11 Proposed North Elevation - Cultural Exchange Building –	1510_A_B3a_17_11 North Elevation - Cultural Exchange Building
1510_A_B3a_17_12 Proposed East Elevation - Cultural Exchange Building	1510_A_B3a_17_12 East Elevation - Cultural Exchange Building

109. Subject to these amendments and additions, the Secretary of State is satisfied that the conditions recommended by the Inspector comply with the policy test set out at paragraph 57 of the Framework and that the conditions set out at Annexes B1 and B2 should form part of his decision on these applications.

110. In reaching this conclusion, the Secretary of State has taken into account the issues around enforceability in diplomatic premises, as set out at paragraphs 103-105 above. He considers this is material to the question of whether conditions can lawfully be imposed. He considers that, taking a pragmatic view, it is reasonable for him to conclude that the conditions are likely to be adhered to by the applicant, and that the proposed conditions are therefore de facto enforceable.

### **Planning obligations**

111. The Secretary of State has had regard to the Inspector's analysis at IR12.3-12.6 and IR13.204-13.228, the planning obligation dated 1 May 2025, the Community Infrastructure Levy (CIL) Compliance Statement dated 30 April 2025, paragraph 58 of the Framework, the Guidance and the CIL Regulations 2010, as amended.

112. As set out by the Inspector at IR12.4-12.5, there are elements of the planning obligations which are disputed between the main parties. The signed section 106 agreement includes a blue pencil clause at Clause 25 under which it is for the Secretary of State to determine whether the obligations are compliant with Regulation 122 of the CIL Regulations (IR13.204).

113. The Secretary of State has given regard to the Inspector's assessment of the agreed and disputed financial contributions at IR13.205-13.215.

114. He agrees with the Inspector at IR13.206 that the agreed contributions set out at IR13.205 meet all of the legal tests. He notes at IR13.207-13.210 that the applicant wrote to the Planning Inspectorate following submission of the signed deed, seeking a specific scope of works and initiatives with regard to the CCTV and Royal Mint Green contributions, and that for the reasons set out in IR13.209-13.210, the Inspector disregarded this statement. The Secretary of State has noted that this letter and the subsequent LBTH letter (IR13.208) were accepted as inquiry documents, and unlike the Inspector has taken it into account. He considers that the scope of works secured through the obligation is sufficiently specific for decision-making, and agrees with the Inspector at IR13.209 that these obligations are in accordance with the legal tests. He therefore considers that they should apply. He has further noted the dispute resolution clause within the planning obligation, as referenced by the Inspector at IR13.210.

115. For the reasons set out in IR13.211-13.215, the Secretary of State agrees that the disputed contributions referenced at IR13.11 would meet the tests, and should apply (IR13.215).

116. For the reasons given at IR13.216-13.219, the Secretary of State agrees that the obligations in Schedule 4 (Employment Skills, Training and Enterprise) would not meet the tests, with the exception of the Apprentice Payment in Lieu as referenced at IR13.217. He considers that only this element of Schedule 4 should apply, and has not taken the disapplied obligations into account in reaching his decision.<sup>47</sup>

117. The Secretary of State has considered the Inspector's assessment of Schedule 5 (Energy and Sustainability) at IR13.220-13.221. He does not consider that it would be reasonable to impose this obligation on an embassy, or that in the circumstances of this case it would be

1510_A_B3a_17_13 Proposed South Elevation - Cultural Exchange Building	1510_A_B3a_17_13 South Elevation - Cultural Exchange Building
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<sup>47</sup> The Secretary of State considers that the reference to Articles 13 and 141 of the EU Treaty Articles on page 26 of the planning obligation is outdated with an unclear effect. However, as this part of the obligation will not take effect, he does not consider it is necessary to address this further.

necessary to make the development acceptable in planning terms. He therefore considers that this obligation should not apply.

118. The Secretary of State has given regard to the analysis of Schedule 6 (Design Certification) at IR13.222-13.224 and notes at IR13.223 that the applicant is using Beijing based architects for the interior of the buildings. He has given consideration to the CIL Compliance Statement submitted to the inquiry, and notes this obligation is necessary to accord with local policy requiring development to respond positively to its context, townscape, landscape and public realm. In this context he considers this obligation meets the tests and should apply.

119. For the reasons set out at IR13.225 the Secretary of State agrees that the obligation at Schedule 7 (Highway Works) meets the tests.

120. The Secretary of State has noted the Inspector's conclusion at IR13.226. He does not consider that revisions to the monitoring fee are necessary as a result of the disapplication of elements of the obligation, due to the retention of all proposed financial contributions in the agreed planning obligation. Given this, the Secretary of State considers that the monitoring fee as defined in the planning obligation meets the tests.

121. For the reasons set out above, the Secretary of State considers that, with the exception of all obligations in Schedule 4 other than the Apprentice Payment in Lieu contribution, and Schedule 5, the obligations comply with Regulation 122 of the CIL Regulations 2010 and the tests at paragraph 57 of the Framework and should therefore apply.

### **Planning balance and overall conclusion**

122. For the reasons given above, the Secretary of State has concluded that while strictly speaking there is non-compliance with LP Policy D9b, and some policy conflict with LP Policy D6 and THLP Policy D.DH8, overall there is accordance with the policy emphasis of policy D9 as a whole, and accordance with amenity policies. He has also identified slight conflict with THLP Policy S.DH3. He considers that there is strong policy support for the proposals (IR13.229), and further considers that the proposed development is in accordance with the development plan overall. He has gone on to consider whether there are material considerations which indicate that the proposal should be determined other than in line with the development plan.

123. Weighing in favour of the proposal are the collective benefits to the above-ground designated heritage assets and the enhancement to the Cistercian Abbey ruins and their setting which carry substantial weight; design and improvements to the character and appearance of the area which carry substantial weight; reuse of this brownfield site which carries substantial weight; sustainability which carries significant weight; and economic benefits which carry limited weight.

124. Weighing against the proposal is the less than substantial harm to the archaeological assets which carries great weight, and the potential for disruption arising from future larger protests which carries moderate weight.

125. In line with the heritage balance set out at paragraph 215 of the Framework, the Secretary of State has considered whether the identified less than substantial harm to the significance of the archaeological assets is outweighed by the public benefits of the proposal. Taking into the account the public benefits of the proposal, as set out at paragraph 123 above, overall the Secretary of State considers that the public benefits of the scheme are collectively sufficient to outbalance the identified less than substantial harm. He therefore considers that the balancing exercise under paragraph 215 of the Framework is favourable to the proposal.

126. Overall, in applying s.38(6) of the PCPA 2004, the Secretary of State considers that the accordance with the development plan and the material considerations in this case indicate that permission should be granted. He further considers that listed building consent should be granted.

127. The Secretary of State therefore concludes that planning permission and listed building consent should be granted, subject to conditions.

### **Formal decision**

128. Accordingly, for the reasons given above, the Secretary of State agrees with the Inspector's recommendation. Subject to the conditions set out in Annexes B1 and B2 of this decision letter, he hereby grants planning permission and listed building consent for:

#### Planning permission

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, in accordance with application ref PA/24/01229/A1, dated 15 July 2024, and subject to the conditions in Annex B1.

#### Listed building consent

Refurbishment and restoration of the Johnson Smirke Building (Grade II\* listed), partial demolition, remodelling and refurbishment of the Seaman's Registry (Grade II listed), with alterations to the west elevation of the building, the retention, along with part demolition and alterations to the existing boundary wall and front railings and demolition of substation, associated landscaping, and all ancillary and associated works, in accordance with application ref PA/24/01248/NC, dated 15 July 2024, and subject to the conditions in Annex B2.

129. This letter does not convey any approval or consent which may be required under any enactment, bye-law, order or regulation other than section 57 of the TCPA 1990 and section 8 of the LBCA 1990.

### **Right to challenge the decisions**

130. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decisions may be challenged. This must be done by making an application to the High Court within 6 weeks from the day after the date of this letter for leave to bring a statutory review under section 288 of the TCPA 1990. A challenge to the decision on listed building consent may be made under section 63 of the LBCA 1990.

131. A copy of this letter has been sent to LBTH and notification has been sent to others who asked to be informed of the decision.

Yours faithfully

*Planning Casework Unit*

*This decision was made by the Secretary of State and signed on his behalf*

## Annex A – Schedule of representations

### Representations and responses received in response to the Secretary of State's letter of 6 August 2025

Party	Date
Metropolitan Police Service	19 August 2025
Royal Mint Court Residents Association	19 August 2025
DP9 Ltd (on behalf of the applicant)	20 August 2025
Foreign, Commonwealth and Development Office and the Home Office	20 August 2025
Friends of St Katharine's Docks	20 August 2025
Hongkongers in Britain	20 August 2025

### Representations and responses received in response to the Secretary of State's recirculation letter of 22 August 2025

Party	Date
London Borough of Tower Hamlets	27 August 2025
Metropolitan Police Service	28 August 2025
Friends of St Katharine's Docks	8 September 2025
Hongkongers in Britain	8 September 2025
Royal Mint Court Residents Association	8 September 2025
Chinese Embassy in the UK (applicant)	9 September 2025
Interparliamentary Alliance on China	9 September 2025
Foreign, Commonwealth and Development Office	10 September 2025
Foreign, Commonwealth and Development Office	16 September 2025
Foreign, Commonwealth and Development Office and the Home Office	2 October 2025
Foreign, Commonwealth and Development Office and the Home Office	27 November 2025

### Responses to the Secretary of State's letter of 16 September 2025 to London Borough of Tower Hamlets

Party	Date
London Borough of Tower Hamlets	23 September 2025
London Borough of Tower Hamlets	24 September 2025

### Representations and responses received in response to the Secretary of State's recirculation letters of 16 October and 2 December 2025

Party	Date
Chinese Embassy in the UK	11 December 2025
Royal Mint Court Residents Association	15 December 2025
Friends of St Katharine's Docks	16 December 2025
Interparliamentary Alliance on China	16 December 2025

### Representations and responses received in response to the Secretary of State's letter of 23 October 2025 to the Home Office and Foreign, Commonwealth and Development Office

Party	Date
No response received	

**Correspondence received in response to the Planning Casework Unit's letter of 29 October 2025 to the Foreign, Commonwealth and Development Office**

Party	Date
Foreign, Commonwealth and Development Office	10 November 2025

**Correspondence received in response to the Planning Casework Unit's letter of 12 November to DP9 Ltd**

Party	Date
DP9 Ltd	20 November 2025

**Representations and responses received in response to the Secretary of State's recirculation letter of 17 December 2025**

Party	Date
Chinese Embassy in the UK	22 December 2025
Royal Mint Court Residents Association	23 December 2025
Foreign, Commonwealth and Development Office	24 December 2025
Home Office	24 December 2025

These representations and responses were recirculated to parties on 6 January 2026 for information. This recirculation also enclosed a letter from Royal Mint Court Residents Association dated 22 December 2025.

**Correspondence received in response to Planning Inspectorate's email of 5 January 2026 to DP9 Ltd**

Party	Date
DP9 Ltd	5 January 2026, enclosing email dated 20 August 2025
DP9 Ltd	13 January 2026

**Correspondence received in response to Planning Inspectorate's email of 6 January 2026 to DP9 Ltd**

Party	Date
DP9 Ltd	5 January 2026, enclosing document dated 31 January 2025
DP9 Ltd	7 January 2026
DP9 Ltd	13 January 2026

**Correspondence received in response to the Secretary of State's letter of 9 January 2026 to the Foreign, Commonwealth and Development Office**

Party	Date
Foreign, Commonwealth and Development Office	12 January 2026

**Representations and responses received in response to the Secretary of State's letter of 13 January 2026**

<b>Party</b>	<b>Date</b>
Chinese Embassy in the UK	14 January 2026
Royal Mint Court Residents Association	15 January 2026
Interparliamentary Alliance on China	15 January 2026

**General representations**

<b>Party</b>	<b>Date</b>
I Duncan Smith MP	04 December 2024
K Hollinrake MP	25 January 2025
M Creagh MP	07 February 2025
S Y Chan	09 February 2025
W Y Hang	10 February 2025
Y K Bunday	11 February 2025
L Greenwood MP	11 February 2025
P Kohler MP	11 February 2025
L Franey	12 February 2025
Y W Kang	12 February 2025
M Stride MP	12 February 2025
R Maskell MP	13 February 2025
C Davis	14 February 2025
S Race MP	14 February 2025
T So	17 February 2025
A Ng	18 February 2025
W Cheng	20 February 2025
D Chan	21 February 2025
E Tang	21 February 2025
K Chan	23 February 2025
L Tam	23 February 2025
S L Yeung	23 February 2025
B Yu	24 February 2025
K Mather MP	24 February 2025
S Freebairn-Smith	25 February 2025
W Hobhouse MP	25 February 2025
A Ng	26 February 2025
C Onwurah MP	26 February 2025
C F Leung	05 March 2025
M Alexander	05 March 2025
A Soderman	05 March 2025
S Cullen	07 March 2025
A Quail	09 March 2025
J Cartlidge MP	11 March 2025
A Levy	11 March 2025
J Cartlidge MP	12 March 2025
Royal Mint Estate Tenant and Resident Association	14 March 2025
Historic England	17 March 2025

S F Mak	21 March 2025
S M Shea	21 March 2025
E Darlington MP	24 March 2025
G Clifton-Brown MP	27 March 2025
Royal Mint Court Residents Association	02 April 2025
A Tasker	12 April 2025
K Hollinrake MP	12 April 2025
S Conway (Wokingham Borough Council)	28 April 2025
H Hayes MP	01 May 2025
M Lahiff	02 May 2025
K Hollinrake MP	26 May 2025, attached letter dated 23 May 2025
H Whately MP	28 May 2025
H Whately MP	28 May 2025
P Garrod	01 June 2025
Lord Alton of Liverpool	04 June 2025
L Greenwood MP	06 June 2025
P Garrod	08 June 2025
R Warburton	09 June 2025
E Wu	16 June 2025
H Lau	16 June 2025
K Kong	16 June 2025
C Y Chum	16 June 2025
J Wong	16 June 2025
W M Wong	16 June 2025
P C Chow	16 June 2025
J Chan	16 June 2025
J Yung	16 June 2025
C W Chiu	16 June 2025
E Ma	16 June 2025
S Lai	16 June 2025
L Lee	16 June 2025
D Wade	16 June 2025
K Y Chan	16 June 2025
W W Lam	16 June 2025
C Kam	16 June 2025
I Wong	16 June 2025
Taiwan Democracy	16 June 2025
A Wong	16 June 2025
L Chow	16 June 2025
P Lam	16 June 2025
Y H Wong	16 June 2025
M Cheng	16 June 2025
N Hewitt	16 June 2025
T M Cheng	16 June 2025
A Leung	16 June 2025
R Chan	16 June 2025
P Lau	16 June 2025
S Y Leung	16 June 2025
W Fan	16 June 2025

O Koon	16 June 2025
S Chiu	16 June 2025
B Pang	16 June 2025
B Lee	16 June 2025
D Ko	16 June 2025
A Wong	16 June 2025
P Li	16 June 2025
S W J To	16 June 2025
S Wong	16 June 2025
N Aidan	16 June 2025
D Chan	16 June 2025
K Chan	16 June 2025
E Chan	16 June 2025
J Tang	16 June 2025
N Wong	16 June 2025
D Lee	16 June 2025
F Tang	16 June 2025
C Chu	16 June 2025
W Lee	16 June 2025
P Wong	16 June 2025
N K Wai	16 June 2025
V Tsang	16 June 2025
W Leung	16 June 2025
A Siu	16 June 2025
Y Hung	16 June 2025
C Tse	16 June 2025
B Kim	16 June 2025
S Chan	16 June 2025
S Chow	16 June 2025
B Chow	16 June 2025
J Ching	16 June 2025
J Ng	16 June 2025
M Lau	16 June 2025
L Heung	16 June 2025
E Nip	16 June 2025
K Sit	16 June 2025
KL Wong	16 June 2025
C Siu	16 June 2025
M Chan	16 June 2025
D Leung	16 June 2025
V Leung	16 June 2025
K Tam	16 June 2025
G Ng	16 June 2025
L Hiu	16 June 2025
W Chiu	16 June 2025
C Chan	16 June 2025
N Kwan	16 June 2025
S Tang	16 June 2025
C Wan	16 June 2025
D Tung	16 June 2025

M Ng	16 June 2025
A Tik	16 June 2025
U Leo	16 June 2025
K Lau	16 June 2025
T Tsang	16 June 2025
K Hui	16 June 2025
Y Wong	16 June 2025
D Chan	16 June 2025
G Chi	16 June 2025
M Tam	16 June 2025
C Chan	16 June 2025
A Chau	16 June 2025
T Lee	16 June 2025
Z Ching	16 June 2025
V So	16 June 2025
T Lam	16 June 2025
V Hui	16 June 2025
A Ng	16 June 2025
C Wong	16 June 2025
L Law	16 June 2025
M Wong	16 June 2025
Sutton Hong Kong Culture & Art Society	16 June 2025
C Hung	16 June 2025
D Hung	16 June 2025
G Wong	16 June 2025
C Lau	16 June 2025
K Lam	16 June 2025
S Sit	16 June 2025
T Fong	16 June 2025
J Chow	16 June 2025
J Lam	16 June 2025
A Wong	16 June 2025
A Yau	16 June 2025
A Chan	16 June 2025
W Wei	16 June 2025
C Cheung	16 June 2025
S Chan	16 June 2025
J Park	16 June 2025
H Lau	16 June 2025
H Ho	16 June 2025
T Ip	16 June 2025
H C Khoo	16 June 2025
P Nolan	16 June 2025
K Randall	16 June 2025
S Fong	16 June 2025
M Ng	16 June 2025
C Au	16 June 2025
C Wu	16 June 2025
P Chan	16 June 2025
D Lam	16 June 2025

J Tong	16 June 2025
F Liu	16 June 2025
B Chan	16 June 2025
T King, A King	16 June 2025
M Tse	16 June 2025
T Wong	16 June 2025
K Lam, Y Lam, K Lam, M Ip, C Lam	16 June 2025
A Yu	16 June 2025
C Yang	16 June 2025
W Lo	16 June 2025
E Lo	16 June 2025
J Chiu	16 June 2025
S Cheung	16 June 2025
W Chan	16 June 2025
C Wan	16 June 2025
C Cheung	16 June 2025
L Shek	16 June 2025
J Kan	16 June 2025
M Kung	16 June 2025
M Law	16 June 2025
E Ng	16 June 2025
Y Law	16 June 2025
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K Li	16 June 2025
N Ma	16 June 2025
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B Chan	16 June 2025
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S Chan	16 June 2025
A Ho	17 June 2025
S Wong	17 June 2025
S Hwm	17 June 2025
Y Wong	17 June 2025
V Hui	17 June 2025
K Chan	17 June 2025
R Lai	17 June 2025
M Ng	17 June 2025
G Cheng	17 June 2025

C Sze	17 June 2025
A Chan	17 June 2025
L Ho	17 June 2025
J Fung	17 June 2025
G Lau	17 June 2025
M Ng, Y Ngan	17 June 2025
D Leung	17 June 2025
A Sinclair	17 June 2025
A Cheng	17 June 2025
K Leung	17 June 2025
A Lau	17 June 2025
W Lau	17 June 2025
T Yeung	17 June 2025
G Kwong	17 June 2025
Y Leung	17 June 2025
C Ng	17 June 2025
J Man	17 June 2025
D Wong	17 June 2025
F Ren	17 June 2025
R Lau	17 June 2025
T Suen	17 June 2025
B Sum	17 June 2025
Q Leung	17 June 2025
N Cheng	17 June 2025
R Chan	17 June 2025
X Jiang	17 June 2025
A Chan	17 June 2025
C Lau	17 June 2025
C Wong	17 June 2025
A Ho	17 June 2025
J Wong	17 June 2025
S Tsui	17 June 2025
A Wong	17 June 2025
V So	17 June 2025
J Lui	17 June 2025
K Wong	17 June 2025
M Yiu	17 June 2025
A Yeung	17 June 2025
W Ng	17 June 2025
M Chan	17 June 2025
G Chu	17 June 2025
S Ng	17 June 2025
H Ho	17 June 2025
K Lau	17 June 2025
W C Kwok	17 June 2025
J Lau	17 June 2025
S Tsoi	17 June 2025
B Lo	17 June 2025
R Lau	17 June 2025
E Law	17 June 2025

N Lai	17 June 2025
J Ho	17 June 2025
B Chan	17 June 2025
S Kam	17 June 2025
K Wong	17 June 2025
W Wong	17 June 2025
M Cheung	17 June 2025
W Sham	17 June 2025
Y Fan	17 June 2025
F Chan	17 June 2025
M Tang	17 June 2025
J Wong	17 June 2025
M Yau	17 June 2025
S Koo	17 June 2025
J Tai	17 June 2025
M Kwan	17 June 2025
E Ng	17 June 2025
C Tang	17 June 2025
L Lam	17 June 2025
M Lau	17 June 2025
D Ng	17 June 2025
S Choi	17 June 2025
J Tang	17 June 2025
A Chan	17 June 2025
A Fung	17 June 2025
K Ng	17 June 2025
W Chow	17 June 2025
J Chan	17 June 2025
K Chung	17 June 2025
F Hui	17 June 2025
K Lee	17 June 2025
Y Chan	17 June 2025
K Low	17 June 2025
C Chu	17 June 2025
C Cham	17 June 2025
M Reade	17 June 2025
A Sa	17 June 2025
M Ng	17 June 2025
C Sum	17 June 2025
N Leung	17 June 2025
F Wong	17 June 2025
T Tsoi	17 June 2025
L Ho	17 June 2025
C Yau	17 June 2025
B Wong	17 June 2025
T Chiu	17 June 2025
B Fung	17 June 2025
N Ma	17 June 2025
A Yau	17 June 2025
V Chan	17 June 2025

M Ko	17 June 2025
K Lau	17 June 2025
R Chow	17 June 2025
P Hui	17 June 2025
J Sin	17 June 2025
T Yang	17 June 2025
S Ho	17 June 2025
K H Chiang	17 June 2025
K Liu	17 June 2025
Y Fung	17 June 2025
K Law	17 June 2025
T Wu	17 June 2025
K Jang	17 June 2025
T Liu	17 June 2025
H Lau	17 June 2025
D Wan	17 June 2025
W Cheung	17 June 2025
T Chan	17 June 2025
B Lo	17 June 2025
I Nip	17 June 2025
L Cheung	17 June 2025
G Lam	17 June 2025
C Chan	17 June 2025
P Chan	17 June 2025
M Luk	17 June 2025
R Leung	17 June 2025
S Y Lo	17 June 2025
C Pang	17 June 2025
B Law	17 June 2025
E Fung	17 June 2025
K F Poon	17 June 2025
J Wong	17 June 2025
C Leung	17 June 2025
K Leung	17 June 2025
T Ng	17 June 2025
K Cheung	17 June 2025
S Wong	17 June 2025
S Wan	17 June 2025
R Chow	17 June 2025
Y F Chan	17 June 2025
T Wong	17 June 2025
C Hui	17 June 2025
D Choi	17 June 2025
M Chung	17 June 2025
W Lam	17 June 2025
M Hui	17 June 2025
J Chan	17 June 2025
J Li	17 June 2025
R Leung	17 June 2025
K P Liu	17 June 2025

V Lau	17 June 2025
D Tang	17 June 2025
H Wong	17 June 2025
P Yau	17 June 2025
B Fan	17 June 2025
C Cheng	17 June 2025
H Lee	17 June 2025
J Nip	17 June 2025
R On	17 June 2025
Wong	17 June 2025
P Chan	17 June 2025
M Ng	17 June 2025
K Chiu	17 June 2025
P Chiu	17 June 2025
J Yuen	17 June 2025
C Chan	17 June 2025
K Chow	17 June 2025
P Cheung	17 June 2025
S Lo	17 June 2025
K Yu	17 June 2025
H Chan	17 June 2025
K Chan	17 June 2025
G Woo	17 June 2025
E Hui	17 June 2025
F Yuen	17 June 2025
I Yu	17 June 2025
E Tso	17 June 2025
K Leung	17 June 2025
Y Chiang	17 June 2025
K Kau	17 June 2025
Y Lau	17 June 2025
P Wong	17 June 2025
K Chan	17 June 2025
W Wong	17 June 2025
C Wong	17 June 2025
S Leung	17 June 2025
I Shiu	17 June 2025
M Ngan	17 June 2025
W Wong	17 June 2025
A Dodson	17 June 2025
L Wong	17 June 2025
L Chan	17 June 2025
J Hung	17 June 2025
I Wong	17 June 2025
F Ling	17 June 2025
J Chan	17 June 2025
S Chan	17 June 2025
M Tang	17 June 2025
S Chan	18 June 2025
KChan	18 June 2025

K Lau	18 June 2025
B Tang	18 June 2025
K Ng	18 June 2025
A Lou	18 June 2025
D Fang	18 June 2025
E Tse	18 June 2025
R Leung	18 June 2025
D Sung	18 June 2025
M Chan	18 June 2025
P Cheung	18 June 2025
K Fung	18 June 2025
K Chan	18 June 2025
I Hui	18 June 2025
D Lui	18 June 2025
P N Yip	18 June 2025
M F Li	18 June 2025
S Kwok	18 June 2025
L Tsao	18 June 2025
Z Leung	18 June 2025
P Chau	18 June 2025
C Mak	18 June 2025
M Wong	18 June 2025
P Lam	18 June 2025
Y Wong	18 June 2025
C Mak	18 June 2025
O Chan	18 June 2025
A Li	18 June 2025
T M Liu	18 June 2025
C Leung	18 June 2025
C Y Wong	18 June 2025
C Leung	18 June 2025
J Kung	18 June 2025
L Lee	18 June 2025
M Chiu	18 June 2025
M Poon	18 June 2025
X Lai	18 June 2025
C Kong	18 June 2025
J Yuen	18 June 2025
K Chan	18 June 2025
L Chiu	18 June 2025
K To	18 June 2025
T Choi	18 June 2025
M Y Lee	18 June 2025
E Wong	18 June 2025
C H Lam	18 June 2025
S Lui	18 June 2025
D Chiu	18 June 2025
D Sin	18 June 2025
K Szeto	18 June 2025
C Chan	18 June 2025

E Lo	18 June 2025
L Wong	18 June 2025
S Mak	18 June 2025
K T Fung	18 June 2025
R Fung	18 June 2025
H Chan	18 June 2025
K K Ho	18 June 2025
C Chiu	18 June 2025
C Tsui	18 June 2025
T Linn	18 June 2025
K T Chow	18 June 2025
W K Yuen	18 June 2025
Z Chan	18 June 2025
F Wong	18 June 2025
H Hung	18 June 2025
J Ng	18 June 2025
S C Lam	18 June 2025
M Chan	18 June 2025
A Heung	18 June 2025
C Leung	18 June 2025
W H Sung	18 June 2025
S Tam	18 June 2025
S Leung	18 June 2025
S Chin	18 June 2025
I Duncan Smith MP	18 June 2025
J Lam	19 June 2025
E Wong	19 June 2025
C Ho	19 June 2025
M Wat	19 June 2025
K Li	19 June 2025
S Tam	19 June 2025
J Chan	19 June 2025
K Mok	19 June 2025
Y Lam	19 June 2025
K So	19 June 2025
J Fan	19 June 2025
K Chui	19 June 2025
C Cheng	19 June 2025
A Yau	19 June 2025
M Chan	19 June 2025
H Chow	19 June 2025
S Chow	19 June 2025
Y Tsang	19 June 2025
N Yuen	19 June 2025
M Chan	19 June 2025
A Ma	19 June 2025
C Law	19 June 2025
J So	19 June 2025
T Cooper	19 June 2025
W Wong	19 June 2025

K Shum	19 June 2025
C Tang	19 June 2025
Y Wong	19 June 2025
G Tung	19 June 2025
W Law	19 June 2025
S Lam	19 June 2025
M Lam	19 June 2025
W Hui	19 June 2025
I Hui	19 June 2025
P Hui	19 June 2025
E Chan	19 June 2025
J Chan	19 June 2025
Tower Hamlets Crime Watch	19 June 2025
M Choi	19 June 2025
S Ching	19 June 2025
J Wu	19 June 2025
Y Chau	19 June 2025
T Mak	19 June 2025
V Yeung	19 June 2025
G Wong	19 June 2025
C Mak	19 June 2025
K Lo	19 June 2025
K Kwok	19 June 2025
W Kwan	19 June 2025
Pat Wai	19 June 2025
A Chu	19 June 2025
K So	19 June 2025
M Kwan	19 June 2025
Y Yip	19 June 2025
W Wan	19 June 2025
N Ma	19 June 2025
C Chow	19 June 2025
C Wong	20 June 2025
C Chan	20 June 2025
A Tung	20 June 2025
R Law	20 June 2025
F Hung	20 June 2025
T Fan	20 June 2025
K Lau	20 June 2025
H Yuen	20 June 2025
O Kanat	20 June 2025
F Kwan	20 June 2025
R Sin	20 June 2025
Z Lam	20 June 2025
Q Li	20 June 2025
P Tam	20 June 2025
W Kan	20 June 2025
S Wong	20 June 2025
L Yeung	20 June 2025
S Siu	20 June 2025

K Kung	20 June 2025
S Lam	20 June 2025
J Kong	20 June 2025
S Chiu	20 June 2025
L Ho	21 June 2025
A Abden	21 June 2025
T Chan	21 June 2025
T Lau	21 June 2025
C Yim	21 June 2025
L Kei	21 June 2025
M Mok	21 June 2025
T Chan	21 June 2025
J Hui	21 June 2025
B Tsang	21 June 2025
R Pell	21 June 2025
J Lam	21 June 2025
R Weaver & L Weaver	21 June 2025
W Luk	21 June 2025
J Leung	21 June 2025
W Li	21 June 2025
C Fu	21 June 2025
E Man	21 June 2025
E Ho	21 June 2025
S Ho	21 June 2025
S Ng	21 June 2025
T Cheung	21 June 2025
H Chui	21 June 2025
C Yim	21 June 2025
D Lee	22 June 2025
L Lee	22 June 2025
I Ho	22 June 2025
A Lam	22 June 2025
P Pang	22 June 2025
W Nam	22 June 2025
T Lai & J Leung	22 June 2025
H Shuen	22 June 2025
B Lee	22 June 2025
H Wong	22 June 2025
A Ng	22 June 2025
K Lam	22 June 2025
E Ng	22 June 2025
H Chan	22 June 2025
B Yeung	22 June 2025
E Ng	22 June 2025
H Lee	22 June 2025
A Xu	22 June 2025
B Cu	22 June 2025
L Cheung	22 June 2025
G Lee	22 June 2025
K Chan & B Green	22 June 2025

S Cheung	22 June 2025
L Lo	22 June 2025
K Wong	22 June 2025
K Wong	22 June 2025
C Yeung	23 June 2025
A Ho	23 June 2025
P Tsang	23 June 2025
E Tang	23 June 2025
K Wong	23 June 2025
M Leung	23 June 2025
P Lam	23 June 2025
C Chan	23 June 2025
B Wong	23 June 2025
C Chan	23 June 2025
C Leung	23 June 2025
K Larsen	23 June 2025
Z Au	23 June 2025
P Lee	23 June 2025
D Hui	23 June 2025
P Tsang	23 June 2025
K Szeto	23 June 2025
A Lee	23 June 2025
W Chow	23 June 2025
C Hung	24 June 2025
W Chung	24 June 2025
D Ho	24 June 2025
F Chan	24 June 2025
Jack Lui	24 June 2025
E Tung	24 June 2025
H Sham	24 June 2025
A Tung	24 June 2025
W Lai	24 June 2025
C Kwan	24 June 2025
C Ho	24 June 2025
D Chan	24 June 2025
C Nokes MP	24 June 2025
T Tugendhat MP	24 June 2025
T Farron MP	24 June 2025
A Wong	25 June 2025
K Tse	25 June 2025
I Wong	25 June 2025
P Le Bas	25 June 2025
C Kin	25 June 2025
L Collins	25 June 2025
J Lo	25 June 2025
C To	25 June 2025
C Cheung	25 June 2025
M Kwok	25 June 2025
T Wong	25 June 2025
M Ko	25 June 2025

K Mo	25 June 2025
W Cheng	25 June 2025
T Gordon MP	25 June 2025
M Wong	26 June 2025
K Chan	26 June 2025
C Philp MP	26 June 2025
C Philp MP	26 June 2025
W Yip	27 June 2025
K Wong	27 June 2025
N Chow	29 June 2025
C Chui	29 June 2025
T Lo	29 June 2025
E Cheng	29 June 2025
A Cheng	29 June 2025
G Avison	29 June 2025
M Leung	30 June 2025
Y Leung	30 June 2025
I Lee	30 June 2025
H Tsui	30 June 2025
M Leung	30 June 2025
D Hinds MP	30 June 2025
J Li	01 July 2025
S Ko	01 July 2025
I Roome MP	01 July 2025
S Logan MP	01 July 2025
V Atkins MP	01 July 2025
R Chow	02 July 2025
C Tong	02 July 2025
L Hand	02 July 2025
C Chan	03 July 2025
S Barber	03 July 2025
Y Li	03 July 2025
X Su	03 July 2025
T Hayes MP	03 July 2025
T Hayes MP	03 July 2025
K So	05 July 2025
O Thomas	05 July 2025
A Smith	05 July 2025
C Lin	07 July 2025
P Garrod	07 July 2025
J Smith MP	07 July 2025
S Doughty MP	08 July 2025
W Yiu	09 July 2025
K Yip	13 July 2025
C West MP	14 July 2025
C Dewhirst MP	15 July 2025
R Savage MP	22 July 2025
K Entwistle MP	22 July 2025
P James	25 July 2025
L Hoyle MP	25 July 2025

P Lam	28 July 2025
C Philp MP	31 July 2025
G Evans	04 August 2025
C Voiculescu-Holvad	05 August 2025
P Garrod	07 August 2025
P Todd	07 August 2025
R Warburton	07 August 2025
M McDougall	07 August 2025
A Brandreth MP	07 August 2025
A Carmichael MP	07 August 2025
S Bool MP	07 August 2025
S Currell	08 August 2025
A Hogg	08 August 2025
K Leung	09 August 2025
C Westwood	09 August 2025
C Doherty	09 August 2025
R Fountain	10 August 2025
J Morrissey MP	11 August 2025
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H Hayes MP	12 August 2025, attaching letter dated 11 August 2025
W Morton MP	12 August 2025
R Taylor MP	13 August 2025
A Easton MP	15 August 2025
M McDougall	19 August 2025
R Ali MP	19 August 2025
F Anderson MP	20 August 2025
D Davis MP	22 August 2025
C Onwurah MP	26 August 2025
K Hollinrake MP	29 August 2025
L Hatton MP	01 September 2025
B Wong	08 September 2025
A Pinkerton MP	09 September 2025
S Kerr	10 September 2025
R Savage MP	11 September 2025
H Munro	18 September 2025
M Hillier MP	18 September 2025
D Davis MP	19 September 2025
K Robinson	29 September 2025
J Corbyn MP	02 October 2025
R Baker MP	05 October 2025
J Jones	06 October 2025
Y Cooper MP	07 October 2025
R Warburton	08 October 2025
S Dixon MP	10 October 2025
J Clarke	11 October 2025
T Sims	12 October 2025
Joint Committee on the National Security Strategy	13 October 2025
P Rigby (Rigby Group)	13 October 2025
P Franks	15 October 2025

G Evans	16 October 2025
D Searle	17 October 2025
B Ferris	18 October 2025
C Abbot	21 October 2025
S Stout	22 October 2025
P Comerford	23 October 2025
C Thomas MP	28 October 2025
C Lobsang	02 November 2025
J Fullerton	02 November 2025
Hong Kong Watch	03 November 2025
R Hughes	05 November 2025
A Cooper MP	06 November 2025
S Dixon MP	10 November 2025
C Smith MP	14 November 2025
D Stead	21 November 2025
D Fullard	21 November 2025
G Heywood	21 November 2025
F Green	21 November 2025
A Woodward	21 November 2025
W Ashton	21 November 2025
P Robinson	21 November 2025
P Reade	21 November 2025
J Webb	21 November 2025
T Walker	21 November 2025
K Aird	22 November 2025
D Collier	23 November 2025
J Wong	23 November 2025
A Parker	23 November 2025
G Clarke	24 November 2025
C Chope MP	24 November 2025
H Kidman	25 November 2025
K Rider	25 November 2025
B Dwyer	25 November 2025
A Shaw	25 November 2025
A Boeykens	25 November 2025
N Nesbitt	25 November 2025
P Flynn	25 November 2025
M Clarke	25 November 2025
A Boland	25 November 2025
M Giles	25 November 2025
L Woods	25 November 2025
P Varlow	25 November 2025
H Stephens	25 November 2025
J Welch	25 November 2025
D Abrahams MP	25 November 2025
International Tibet Network	26 November 2025, attaching letter dated 25 November 2025
S Brown	26 November 2025
L Reeve	26 November 2025

S Ashton	26 November 2025
M Paish	26 November 2025
A Fourcin	26 November 2025
R Mairlot	26 November 2025
T Paldon	26 November 2025
R Mallon	26 November 2025
J Gouveia	26 November 2025
J Townsend	26 November 2025
R Cottrell	26 November 2025
G Weilding	26 November 2025
L Kelly	27 November 2025
T Gawa	27 November 2025
M Beavis	27 November 2025
M Campbell	28 November 2025
B Jenkins	01 December 2025
M Waters	01 December 2025
J Barron	01 December 2025
T Yangkey (Office of Tibet)	02 December 2025
K Chow	03 December 2025
K Hussey	03 December 2025
T Donnelly	03 December 2025
J Petersson	03 December 2025
V Atkins MP	05 December 2025
K Hollinrake MP	06 December 2025
A Ramsay MP	08 December 2025
S Tees	10 December 2025
C Onwurah MP	11 December 2025
N Harris	12 December 2025
D Hinds MP	15 December 2025
C Coombs	17 December 2025
D Smith	29 December 2025
K Osamor MP	12 January 2026
A Sobel MP, L Akehurst MP, J Naish MP, P Brickell MP, S Champion MP, E Darlington MP, M Sowards MP, M Rimmer MP and N Mishra MP, sent via Interparliamentary Alliance on China	12 January 2026
C Donovan	12 January 2026
L Lewis	12 January 2026
M Laycock	12 January 2026
P Dormon	12 January 2026
D Viner	13 January 2026
M Bruns	13 January 2026
W Massey	13 January 2026
J Kelso	13 January 2026
T Saville	13 January 2026
M Reacher	13 January 2026
A Grimsdall	13 January 2026
S Snowdon	13 January 2026
C Fung	13 January 2026
B Kean	13 January 2026

P Jones	13 January 2026
P Shiner	13 January 2026
A Hilton	13 January 2026
P Reade	14 January 2026
A Branchini	14 January 2026
G Moyse	14 January 2026
V Harrow	14 January 2026
M Carlisle	14 January 2026
J Morrissey MP	14 January 2026
M Middleton	15 January 2026
T Hill	15 January 2026
K Mather MP	15 January 2026
A Touchin	16 January 2026
S Dalzell	16 January 2026
D Chambers MP	16 January 2026
G Smith MP	16 January 2026
S Percival	17 January 2026
W McGarry	18 January 2026
N Malone	18 January 2026
D Porter	18 January 2026
V Atkins MP	19 January 2026

## Annex B1 – Listed Building Consent conditions

1. The works as approved by this listed building consent shall begin no later than three years from the date of this decision.
2. The works as approved by this listed building consent shall be carried out in accordance with the approved drawings listed below:

1510\_A\_B1\_-PD1\_09 Demolition basement floor plan - Johnson Smirke Building  
1510\_A\_B1\_-PD1\_10 Demolition ground floor plan - Johnson Smirke Building  
1510\_A\_B1\_-PD1\_11 Demolition first floor plan - Johnson Smirke Building  
1510\_A\_B1\_-PD1\_12 Demolition second floor plan - Johnson Smirke Building  
1510\_A\_B1\_-PD1\_13 Demolition third floor plan - Johnson Smirke Building  
1510\_A\_B1\_-PD1\_14 Demolition roof floor plan - Johnson Smirke Building  
1510\_A\_B1\_-PD6\_10 Demolition section CC - Johnson Smirke Building  
1510\_A\_B1\_-PD6\_11 Demolition section DD - Johnson Smirke Building  
1510\_A\_B1\_-PD7\_10 Demolition West and East Elevation - Johnson Smirke Building  
1510\_A\_B1\_-PD7\_11 Demolition North and South Elevation - Johnson Smirke Building  
1510\_A\_B2\_-PD1\_09 Demolition basement floor plan - Seaman's Registry Building  
1510\_A\_B2\_-PD1\_10 Demolition ground floor plan - Seaman's Registry Building  
1510\_A\_B2\_-PD1\_11 Demolition first floor plan - Seaman's Registry Building  
1510\_A\_B2\_-PD1\_12 Demolition second floor plan - Seaman's Registry Building  
1510\_A\_B2\_-PD1\_13 Demolition third floor plan - Seaman's Registry Building  
1510\_A\_B2\_-PD1\_14 Demolition fourth floor plan - Seaman's Registry Building  
1510\_A\_B2\_-PD1\_15 Demolition roof floor plan - Seaman's Registry Building  
1510\_A\_B2\_-PD6\_10 Demolition section AA - Seaman's Registry Building  
1510\_A\_B2\_-PD6\_11 Demolition section BB - Seaman's Registry Building  
1510\_A\_B2\_-PD6\_12 Demolition section CC - Seaman's Registry Building  
1510\_A\_B2\_-PD7\_10 Demolition elevations - West and North West - Seaman's Registry Building  
1510\_A\_B2\_-PD7\_11 Demolition elevations - North and South - Seaman's Registry Building  
1510\_A\_B2\_-PD7\_12 Demolition East elevation - Seaman's Registry Building  
1510\_A\_B4\_-PD7\_22 Demolition - north lodge  
1510\_A\_B4\_-PD7\_23 Demolition - south lodge  
\*1510\_A\_B1\_-P11\_09 Proposed basement floor plan - Johnson Smirke Building Rev 01  
\*1510\_A\_B1\_-P11\_10 Proposed ground floor plan - Johnson Smirke Building Rev 01  
\*1510\_A\_B1\_-P11\_11 Proposed first floor plan - Johnson Smirke Building Rev 01  
\*1510\_A\_B1\_-P11\_12 Proposed second floor plan - Johnson Smirke Building Rev 01  
\*1510\_A\_B1\_-P11\_13 Proposed third floor plan - Johnson Smirke Building Rev 01  
\*\*1510\_A\_B1\_-P11\_14 Proposed roof floor plan - Johnson Smirke Building  
1510\_A\_B1\_-P16\_10 Proposed section CC - Johnson Smirke Building  
1510\_A\_B1\_-P16\_11 Proposed section GG - Johnson Smirke Building  
1510\_A\_B1\_-P16\_12 Proposed section CC - Johnson Smirke Building  
1510\_A\_B1\_-P17\_10 Proposed elevations - West and East - Johnson Smirke Building  
1510\_A\_B1\_-P17\_11 Proposed elevations - North and South - Johnson Smirke Building  
1510\_A\_B1\_-P17\_20 Proposed west elevation entrance - Johnson Smirke Building  
1510\_A\_B1\_-P17\_21 Proposed north elevation entrance - Johnson Smirke Building  
1510\_A\_B1\_-P17\_22 Proposed south elevation entrance - Johnson Smirke Building  
1510\_A\_B1\_-P31\_00 Proposed sections - Secondary Glazing - Johnson Smirke Building  
\*1510\_A\_B2\_-P11\_09 Proposed basement plan - Seaman's Registry Building Rev 01  
\*1510\_A\_B2\_-P11\_10 Proposed ground floor plan - Seaman's Registry Building Rev 01  
\*1510\_A\_B2\_-P11\_11 Proposed first floor plan - Seaman's Registry Building Rev 01  
\*1510\_A\_B2\_-P11\_12 Proposed second floor plan - Seaman's Registry Building Rev 01  
\*1510\_A\_B2\_-P11\_13 Proposed third floor plan - Seaman's Registry Building Rev 01  
\*1510\_A\_B2\_-P11\_14 Proposed fourth floor plan - Seaman's Registry Building Rev 01

\*\*1510\_A\_B2- P11\_15 Proposed roof floor plan - Seaman's Registry Building  
1510\_A\_B2- P16\_10 Proposed section AA - Seaman's Registry Building  
1510\_A\_B2- P16\_11 Proposed section BB - Seaman's Registry Building  
1510\_A\_B2- P16\_12 Proposed section CC - Seaman's Registry Building  
1510\_A\_B2- P16\_20 Proposed section BB - Seaman's Registry Building  
1510\_A\_B2- P17\_10 Proposed elevations - West and North West - Seaman's Registry Building  
1510\_A\_B2- P17\_11 Proposed elevations - North and South - Seaman's Registry Building  
1510\_A\_B2- P17\_12 Proposed East elevation - Seaman's Registry Building  
1510\_A\_B2- P17\_20 Proposed North elevation façade infill - Seaman's Registry Building  
1510\_A\_B2- P17\_21 Proposed South and East entrances - Seaman's Registry Building  
1510\_A\_B2- P31\_00 Proposed Secondary Glazing Section - Seaman's Registry Building  
1510\_A\_B2- P31\_01 Proposed West Elevation façade detail - Seaman's Registry Building  
1510\_A\_B4- 17\_21 Proposed Elevation- Entrance Pavillion East and West -Masterplan  
1510\_A\_B4- 17\_22 Proposed Elevation- Entrance Pavillion North and South Masterplan  
1510\_A\_B4- P11\_21 Proposed Ground Floor Plan - Entrance Pavillion - Masterplan  
1510\_A\_B4- P16\_21 Proposed Section FF - Entrance Pavillion - Masterplan  
1510\_A\_B4- P17\_23 Proposed Works – North Lodge  
1510\_A\_B4- P17\_24 Proposed Works - South Lodge  
1510\_A\_B4- PD1\_22 Proposed works – Lamp posts Masterplan  
1510\_A\_B4- PD7\_24 Proposed Works - Seaman's Registry Arch  
1510\_A\_B4- PD7\_25 Proposed Works - Front Railing

3. No works as approved by this listed building consent shall take place until details of a scheme to secure and protect existing historic features against accidental loss, damage, or theft during the execution of authorised works on site has been submitted to and approved in writing by the local planning authority. The approved scheme of protection shall be undertaken before any development as approved by this Listed Building Consent commences on site and shall be retained in situ unless otherwise agreed, until the development is complete.

No such features shall be disturbed or removed temporarily or permanently without the prior approval in writing of the Council, in accordance with relevant Historic England guidance.

4. No works as approved by this listed building consent shall take place until a specification of building works, recording and analysis; the making of a detailed record; and a watching brief during the works affecting the historic fabric has been submitted to and approved in writing by the Local Planning Authority.
5. No works as approved by this listed building consent shall take place until samples (to be provided on-site) and full particulars of all external and internal facing materials to be used in the construction of the development have been submitted to and approved in writing by the Local Planning Authority.

Details submitted pursuant to this condition shall include but are not restricted to:

- a. Detailed method statements for all internal and external works including works of making good, prepared by a suitably qualified and experienced heritage construction/renovation professional.
- b. Details of all internal works and samples of any new or replacement fabric. Drawings shall be at a scale of no less than 1:5.
- c. Samples and details of external cladding. Details of external cladding, where relevant, shall include all types of brick or other cladding material to be used, details of bond,

mortar and pointing for brick and details of joints, panel sizes and fixing method for other types of cladding.

- d. Samples and drawings of fenestration. Details of fenestration, where relevant, shall include reveals, sills and lintels. Drawings shall be at a scale of no less than 1:5.
- e. Drawings and details of entrances. Details of entrances, where relevant, shall include doors, reveals, canopies, signage, entry control, post boxes, CCTV, lighting and soffit finishes. Drawings shall be at a scale of no less than 1:5.
- f. Samples and details of roofing.
- g. Details of any balconies, terraces or wintergardens and associated balustrades, soffits and drainage.
- h. Details of any external rainwater goods, flues, grilles, louvres and vents.
- i. Details of any external plant, plant enclosures and safety balustrades.

The works as approved by this listed building consent shall not be carried out other than in accordance with the approved details.

- 6. During the works approved by this listed building consent, if hidden historic features are revealed they should be retained in-situ. Works shall be halted in the relevant area of the listed building and the Local Planning Authority should be notified immediately.

## Annex B2 – Planning Permission conditions

1. The development shall begin no later than three years from the date of this decision.
2. The development shall be carried out in accordance with the approved drawings listed below:

\*\*1510\_A\_B4-\_11\_05 Location Plan - Proposed Scheme  
\*\*1510\_A\_B4-\_11\_08 Site Plan - Proposed Scheme  
1510\_A\_B1-\_PD1\_09 Demolition basement floor plan - Johnson Smirke building  
1510\_A\_B1-\_PD1\_10 Demolition ground floor plan - Johnson Smirke building  
1510\_A\_B1-\_PD1\_11 Demolition first floor plan - Johnson Smirke building  
1510\_A\_B1-\_PD1\_12 Demolition second floor plan - Johnson Smirke building  
1510\_A\_B1-\_PD1\_13 Demolition third floor plan - Johnson Smirke building  
1510\_A\_B1-\_PD1\_14 Demolition roof floor plan - Johnson Smirke building  
1510\_A\_B1-\_PD6\_10 Demolition section CC - Johnson Smirke building  
1510\_A\_B1-\_PD6\_11 Demolition section DD – Johnson Smirke Building  
1510\_A\_B1-\_PD7\_10 Demolition West and East Elevation - Johnson Smirke Building  
1510\_A\_B1-\_PD7\_11 Demolition North and South Elevation - Johnson Smirke Building  
1510\_A\_B2-\_PD1\_09 Demolition basement floor plan - Seaman's Registry building  
1510\_A\_B2-\_PD1\_10 Demolition ground floor plan - Seaman's Registry building  
1510\_A\_B2-\_PD1\_11 Demolition first floor plan - Seaman's Registry building  
1510\_A\_B2-\_PD1\_12 Demolition second floor plan - Seaman's Registry building  
1510\_A\_B2-\_PD1\_13 Demolition third floor plan - Seaman's Registry building  
1510\_A\_B2-\_PD1\_14 Demolition fourth floor plan - Seaman's Registry building  
1510\_A\_B2-\_PD1\_15 Demolition roof floor plan - Seaman's Registry building  
1510\_A\_B2-\_PD6\_10 Demolition section AA - Seaman's Registry building  
1510\_A\_B2-\_PD6\_11 Demolition section BB - Seaman's Registry building  
1510\_A\_B2-\_PD6\_12 Demolition section CC - Seaman's Registry building  
1510\_A\_B2-\_PD7\_10 Demolition elevations - West and North West - Seaman's Registry Buildings  
1510\_A\_B2-\_PD7\_11 Demolition elevations - North and South - Seaman's Registry Buildings  
1510\_A\_B2-\_PD7\_12 Demolition East elevation - Seaman's Registry Buildings  
1510\_A\_B3AB\_D1\_08 Demolition basement floor plan - Murray and Dexter House North - Sheet 1 of 2  
1510\_A\_B3AB\_D1\_09 Demolition basement floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01  
1510\_A\_B3AB\_D1\_10 Demolition basement floor plan - Murray and Dexter House Mezzanine North - Sheet 1 of 2  
1510\_A\_B3AB\_D1\_11 Demolition basement floor plan - Murray and Dexter House Mezzanine South - Sheet 2 of 2  
1510\_A\_B3AB\_D1\_12 Demolition ground floor plan - Murray and Dexter House North - Sheet 1 of 2  
1510\_A\_B3AB\_D1\_13 Demolition ground floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01  
1510\_A\_B3AB\_D1\_14 Demolition first floor plan - Murray and Dexter House North - Sheet 1 of 2  
1510\_A\_B3AB\_D1\_15 Demolition first floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01  
1510\_A\_B3AB\_D1\_16 Demolition second floor plan - Murray and Dexter House South - Sheet 1 of 2  
1510\_A\_B3AB\_D1\_17 Demolition second floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01  
1510\_A\_B3AB\_D1\_18 Demolition third floor plan - Murray and Dexter House north - Sheet 1 of 2

1510\_A\_B3AB\_D1\_19 Demolition third floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01  
1510\_A\_B3AB\_D1\_20 Demolition fourth floor plan - Murray and Dexter House North - Sheet 1 of 2  
1510\_A\_B3AB\_D1\_21 Demolition fourth floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01  
1510\_A\_B3AB\_D1\_22 Demolition fifth floor plan - Murray and Dexter House North - Sheet 1 of 2  
1510\_A\_B3AB\_D1\_23 Demolition fifth floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01  
1510\_A\_B3AB\_D1\_24 Demolition sixth floor plan - Murray and Dexter House North - Sheet 1 of 2  
1510\_A\_B3AB\_D1\_25 Demolition sixth floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01  
1510\_A\_B3AB\_D1\_26 Demolition roof floor plan - Murray and Dexter House North - Sheet 1 of 2  
1510\_A\_B3AB\_D1\_27 Demolition roof floor plan - Murray and Dexter House South - Sheet 2 of 2  
1510\_A\_B3ab\_D6\_10 Demolition section EE - Murray Dexter House  
1510\_A\_B3ab\_D6\_11 Demolition section CC - Murray Dexter House  
1510\_A\_B3ab\_D6\_12 Demolition section GG - Murray Dexter House - Sheet 1 of 2  
1510\_A\_B3ab\_D6\_13 Demolition section GG - Murray Dexter House - Sheet 2 of 2  
1510\_A\_B3ab\_D7\_10 Demolition elevation 1 - Murray Dexter House North  
1510\_A\_B3ab\_D7\_11 Demolition elevation 2 - Murray Dexter House North  
1510\_A\_B3ab\_D7\_12 Demolition elevation 3 - Murray Dexter House South  
1510\_A\_B3ab\_D7\_13 Demolition elevation 4 - Murray Dexter House West  
1510\_A\_B3ab\_D7\_14 Demolition elevation 5 - Murray Dexter House South  
1510\_A\_B3ab\_D7\_15 Demolition elevation 6 - Murray Dexter House West  
1510\_A\_B3ab\_D7\_16 Demolition elevation 7 - Murray Dexter House East - Sheet 1 of 2  
1510\_A\_B3ab\_D7\_17 Demolition elevation 8 - Murray Dexter House East - Sheet 2 of 2  
1510\_A\_B4-\_D1\_09 Demolition basement plan - Masterplan  
1510\_A\_B4-\_D1\_10 Demolition ground floor plan - Masterplan  
1510\_A\_B4-\_D1\_21 Demolition ground floor plan - Substation/entrance  
1510\_A\_B4-\_D7\_10 Demolition - unfolded boundary wall masterplan  
1510\_A\_B4-\_D7\_18 Demolition - subway staircase masterplan  
1510\_A\_B4-\_D7\_19 Demolition - elevation eastern boundary wall masterplan  
1510\_A\_B4-\_D7\_21 Demolition elevations - Substation/entrance masterplan  
1510\_A\_B4-\_D7\_22 Demolition elevations - Historic Lodges masterplan  
1510\_A\_B4-\_PD7\_22 Demolition - north lodge  
1510\_A\_B4-\_PD7\_23 Demolition - south lodge  
\*1510\_A\_B1-\_P11\_09 Proposed basement floor plan - Johnson Smirke building Rev 01  
\*1510\_A\_B1-\_P11\_10 Proposed ground floor plan - Johnson Smirke building Rev 01  
\*1510\_A\_B1-\_P11\_11 Proposed first floor plan - Johnson Smirke building Rev 01  
\*1510\_A\_B1-\_P11\_12 Proposed second floor plan - Johnson Smirke building Rev 01  
\*1510\_A\_B1-\_P11\_13 Proposed third floor plan - Johnson Smirke building Rev 01  
\*\*1510\_A\_B1-\_P11\_14 Proposed roof floor plan - Johnson Smirke building  
1510\_A\_B1-\_P16\_10 Proposed section CC - Johnson Smirke building  
1510\_A\_B1-\_P16\_11 Proposed section GG - Johnson Smirke building  
1510\_A\_B1-\_P16\_12 Proposed section CC - Johnson Smirke building  
1510\_A\_B1-\_P17\_10 Proposed elevations - West and East - Johnson Smirke Building  
1510\_A\_B1-\_P17\_11 Proposed elevations - North and South - Johnson Smirke Building  
1510\_A\_B1-\_P17\_20 Proposed west elevation entrance - Johnson Smirke Building  
1510\_A\_B1-\_P17\_21 Proposed north elevation entrance - Johnson Smirke Building  
1510\_A\_B1-\_P17\_22 Proposed south elevation entrance - Johnson Smirke Building

1510\_A\_B1-\_P31\_00 Proposed sections - Secondary Glazing - Johnson Smirke Building  
\*1510\_A\_B2-\_P11\_09 Proposed basement plan - Seaman's Registry building Rev 01  
\*1510\_A\_B2-\_P11\_10 Proposed ground floor plan - Seaman's Registry building Rev 01  
\*1510\_A\_B2-\_P11\_11 Proposed first floor plan - Seaman's Registry building Rev 01  
\*1510\_A\_B2-\_P11\_12 Proposed second floor plan - Seaman's Registry building Rev 01  
\*1510\_A\_B2-\_P11\_13 Proposed third floor plan - Seaman's Registry building Rev 01  
\*1510\_A\_B2-\_P11\_14 Proposed fourth floor plan - Seaman's Registry building Rev 01  
\*\*1510\_A\_B2-\_P11\_15 Proposed roof floor plan - Seaman's Registry building  
1510\_A\_B2-\_P16\_10 Proposed section AA - Seaman's Registry building  
1510\_A\_B2-\_P16\_11 Proposed section BB - Seaman's Registry building  
1510\_A\_B2-\_P16\_12 Proposed section CC - Seaman's Registry building  
1510\_A\_B2-\_P16\_20 Proposed section BB - Seaman's Registry building  
1510\_A\_B2-\_P17\_10 Proposed elevations - West and North West - Seaman's Registry Buildings  
1510\_A\_B2-\_P17\_11 Proposed elevations - North and South - Seaman's Registry Buildings  
1510\_A\_B2-\_P17\_12 Proposed East elevation - Seaman's Registry Buildings  
1510\_A\_B2-\_P17\_20 Proposed North elevation façade infill - Seaman's Registry Building  
1510\_A\_B2-\_P17\_21 Proposed South and East entrances - Seaman's Registry Building  
1510\_A\_B2-\_P31\_00 Proposed Secondary Glazing Section - Seaman's Registry Building  
1510\_A\_B2-\_P31\_01 Proposed West Elevation façade detail - Seaman's Registry Building  
\*1510\_A\_B3A\_11\_09 Proposed Basement Plan - Cultural Exchange Building Rev 01  
\*1510\_A\_B3A\_11\_10 Proposed Ground Floor Plan - Cultural Exchange Building Rev 01  
\*1510\_A\_B3A\_11\_11 Proposed First Floor Plan - Cultural Exchange Building Rev 01  
\*1510\_A\_B3A\_11\_12 Proposed Second Floor Plan - Cultural Exchange Building Rev 01  
\*1510\_A\_B3A\_11\_13 Proposed Third Floor Plan - Cultural Exchange Building Rev 01  
\*1510\_A\_B3A\_11\_14 Proposed Fourth Floor Plan - Cultural Exchange Building Rev 01  
\*1510\_A\_B3A\_11\_15 Proposed Fifth Floor Plan - Cultural Exchange Building Rev 01  
\*1510\_A\_B3A\_11\_16 Proposed Sixth Floor Plan - Cultural Exchange Building Rev 01  
\*\*1510\_A\_B3A\_11\_17 Proposed Roof Floor Plan - Cultural Exchange Building  
1510\_A\_B3a\_16\_10 Section EE - Cultural Exchange Building  
1510\_A\_B3a\_16\_11 Section CC - Cultural Exchange Building  
1510\_A\_B3a\_17\_10 Proposed West Elevation - Cultural Exchange Building  
1510\_A\_B3a\_17\_11 North Elevation - Cultural Exchange Building  
1510\_A\_B3a\_17\_12 East Elevation - Cultural Exchange Building  
1510\_A\_B3a\_17\_13 South Elevation - Cultural Exchange Building  
1510\_A\_B3a\_31\_00 Proposed Façade Details 1 - Cultural Exchange Building  
1510\_A\_B3a\_31\_01 Proposed Façade Details 2 - Cultural Exchange Building  
\*1510\_A\_B3b\_11\_08 Proposed Basement Plan - Embassy House North - Sheet 1 of 2 Rev 02  
\*1510\_A\_B3b\_11\_09 Proposed Basement Plan - Embassy House South - Sheet 2 of 2 Rev 02  
\*1510\_A\_B3b\_11\_10 Proposed Ground Floor Plan - Embassy House North - Sheet 1 of 2 Rev 02  
\*1510\_A\_B3b\_11\_11 Proposed Ground Floor Plan - Embassy House South - Sheet 2 of 2 Rev 02  
\*1510\_A\_B3b\_11\_12 Proposed First Floor Plan - Embassy House North - Sheet 1 of 2 Rev 02  
\*1510\_A\_B3b\_11\_13 Proposed First Floor Plan - Embassy House South - Sheet 2 of 2 Rev 02  
\*1510\_A\_B3b\_11\_14 Proposed Second Floor Plan - Embassy House North - Sheet 1 of 2 Rev 02  
\*1510\_A\_B3b\_11\_15 Proposed Second Floor Plan - Embassy House South - Sheet 2 of 2 Rev 02

\*1510\_A\_B3b\_11\_16 Proposed Third Floor Plan - Embassy House North - Sheet 1 of 2 Rev 02  
\*1510\_A\_B3b\_11\_17 Proposed Third Floor Plan - Embassy House South - Sheet 2 of 2 Rev 02  
\*1510\_A\_B3b\_11\_18 Proposed Fourth Floor Plan - Embassy House North- Sheet 1 of 2 Rev 02  
\*1510\_A\_B3b\_11\_19 Proposed Fourth Floor Plan - Embassy House South - Sheet 2 of 2 Rev 02  
\*1510\_A\_B3b\_11\_20 Proposed Fifth Floor Plan - Embassy House North - Sheet 1 of 2 Rev 02  
\*1510\_A\_B3b\_11\_21 Proposed Fifth Floor Plan - Embassy House South - Sheet 2 of 2 Rev 02  
\*1510\_A\_B3b\_11\_22 Proposed Sixth Floor Plan - Embassy House North - Sheet 1 of 2 Rev 03  
\*1510\_A\_B3b\_11\_23 Proposed Sixth Floor Plan - Embassy House South - Sheet 2 of 2 Rev 03  
\*1510\_A\_B3b\_11\_24 Proposed Seventh Floor Plan - Embassy House North - Sheet 1 of 2 Rev 03  
\*1510\_A\_B3b\_11\_25 Proposed Seventh Floor Plan - Embassy House South -Sheet 2 of 2 Rev 03  
\*1510\_A\_B3b\_11\_26 Proposed Roof Floor Plan - Embassy House North - Sheet 1 of 2 Rev 03  
\*1510\_A\_B3b\_11\_27 Proposed Roof Floor Plan - Embassy House South - Sheet 2 of 2 Rev 03  
\*\*1510\_A\_B3b\_21\_11 Proposed unit flat layouts – Embassy House Rev 02  
\*\*1510\_A\_B3b\_21\_12 Proposed unit flat layouts – Embassy House Rev 02  
1510\_A\_B3b\_16\_10 Proposed Sections AA, BB and FF - Embassy House Rev 01  
1510\_A\_B3b\_16\_11 Proposed Section BB - Embassy House  
1510\_A\_B3b\_17\_10 Proposed Elevations - East and West - Embassy House Rev 01  
1510\_A\_B3b\_17\_11 Proposed Elevations - North and South - Embassy House  
1510\_A\_B3b\_31\_00 Proposed Façade Details - Embassy House  
1510\_A\_B3b\_31\_01 Proposed Façade Details - Roof and balcony- Embassy House  
1510\_A\_B3b\_31\_02 Proposed Façade Details – Ground floor- Embassy House  
1510\_A\_B3b\_31\_03 Proposed Façade Details – north facade - Embassy House  
\*1510\_A\_B4-11\_09 Proposed Basement Plan – Masterplan Rev 02  
\*1510\_A\_B4-11\_10 Proposed Ground Floor Plan – Masterplan Rev 02  
\*\*1510\_A\_B4-11\_11 Proposed Roof Plan – Masterplan Rev 02  
\*1510\_A\_B4-11\_12 Proposed Paving Plan – Masterplan Rev 02  
\*\*1510\_A\_B4-11\_19 Proposed Works - Cartwright Street Entrance - Masterplan  
1510\_A\_B4-16\_10 Proposed Section AA - Masterplan  
1510\_A\_B4-16\_11 Proposed Section BB - Masterplan  
1510\_A\_B4-16\_12 Proposed Section CC - Masterplan  
1510\_A\_B4-16\_13 Proposed Section DD - Masterplan  
1510\_A\_B4-16\_14 Proposed Section EE – Masterplan Rev 01  
1510\_A\_B4-16\_21 Proposed Section FF GG – Masterplan Entrance pavilion  
1510\_A\_B4-17\_11 Proposed South Elevation - Masterplan  
1510\_A\_B4-17\_12 Proposed West Elevation - Masterplan  
1510\_A\_B4-17\_13 Proposed North Elevation - Masterplan  
1510\_A\_B4-17\_18 Proposed Elevation- Subway Staircase  
1510\_A\_B4-17\_19 Proposed Elevation- Eastern Boundary Wall  
1510\_A\_B4-17\_21 Proposed Elevation- Entrance Pavilion East and West -Masterplan  
1510\_A\_B4-17\_22 Proposed Elevation- Entrance Pavilion North and South Masterplan  
1510\_A\_B4-17\_23 Proposed Site Entrances - Masterplan  
\*1510\_A\_B4- P11\_21 Proposed Ground Floor Plan - Masterplan - Entrance Pavilion Rev 01

1510\_A\_B4-\_P16\_21 Proposed Section FF – Masterplan - Entrance Pavilion  
1510\_A\_B4-\_P17\_23 Proposed Works – North Lodge  
1510\_A\_B4-\_P17\_24 Proposed Works - South Lodge  
1510\_A\_B4-\_PD1\_22 Proposed works – Lamp posts Masterplan  
1510\_A\_B4-\_PD7\_24 Proposed Works - Seaman's Registry Arch  
1510\_A\_B4-\_PD7\_25 Proposed Works - Front Railing

3. Unless otherwise specified by a S61 Consent granted under the Control of Pollution Act 1974, demolition, building, engineering or other operations associated with the construction of the development (including arrival, departure and loading and unloading of construction vehicles):
  - a. Shall be carried out in accordance with the Tower Hamlets Code of Construction Practice.
  - b. Shall only be carried out within the hours of 08:00 and 18:00 Monday to Friday. No works shall take place on Saturdays, Sundays and Public Holidays.
  - c. Ground-borne vibration shall not exceed 1.0mm/s Peak Particle Velocity (PPV) at residential and 3.0mm/s PPV at commercial properties neighbouring the site.
  - d. Noise levels measured 1 metre from the façade of any occupied building neighbouring the site shall not exceed 75dB(A) at residential and commercial properties, and 65dB(A) at schools and hospitals (LAeq,T where T = 10 hours Monday to Friday and 5 hours for Saturday).

4. No piling shall take place until a Piling Method Statement (detailing the depth, location and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority.

The development shall not be carried out other than in accordance with the approved details.

5. All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall not exceed the emission standards set out in the Mayor of London's 'Control of Dust and Emissions During Construction and Demolition' Supplementary Planning Guidance (SPG) 2014. Unless it complies with the above standards, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority.

An inventory of all Non-Road Mobile Machinery (NRMM) must be kept on site during the course of the demolition, site preparation and construction phases of the development, and must be registered on the online register at <https://nrmm.london/>. All machinery should be regularly serviced and service logs kept on site for inspection. Records of emission limits for all equipment should be kept on site. This documentation should be made available to local authority officers as required until the completion of the development.

6. No development shall take place, including any works of demolition, until a Construction Environmental Management & Logistics Plan has been submitted to and approved in writing by the Local Planning Authority.

The Plan shall aim to minimise the amenity, environmental and road network impacts of the demolition and construction activities and include the details of:

- a. Telephone, email and postal address of the site manager and details of complaints procedures for members of the public;

- b. Measures to maintain the site in a tidy condition in terms of disposal/storage of waste and storage of construction plant and materials;
- c. Scheme for recycling/disposition of waste resulting from demolition and construction works;
- d. Ingress and egress to and from the site for vehicles;
- e. Safeguarding of buried services;
- f. Proposed numbers and timing of vehicle movements through the day and the proposed access routes, delivery scheduling, use of holding areas, logistics and consolidation centres;
- g. Parking of vehicles for site operatives and visitors;
- h. Travel Plan for construction workers;
- i. Construction lighting and timings of such, not to unduly impact on neighbouring amenity;
- j. Location and size of site offices, welfare and toilet facilities;
- k. Erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- l. Measures to ensure that pedestrian access past the site is safe and not obstructed;
- m. Measures to minimise risks to pedestrians and cyclists, including but not restricted to accreditation of the Fleet Operator Recognition Scheme (FORS) and use of banksmen for supervision of vehicular ingress and egress.
- n. Mitigation and monitoring measures for Spills and Pollution Prevention, Noise and Vibration and Air Quality;
- o. A feasibility survey, which shall be carried out to consider the potential for moving demolition and construction material from the site by waterborne freight.

The development shall not be carried out other than in accordance with the approved details.

- 7. Prior to the commencement of development, a Dust Management Plan (DMP), based on an Air Quality and Dust Risk Assessment (AQDRA), shall be submitted to and approved, in writing, by the local planning authority. The DMP shall be in accordance with The Control of Dust and Emissions during Construction and Demolition SPG 2014. The DMP will need to detail the measures to reduce the impacts during the construction phase. The development shall be undertaken in accordance with the approved plan.

During each four construction sub-phases of the proposed development (demolition, earthworks, construction, and trackout), PM10 continuous monitoring shall be carried out on site. Parameters to be monitored, duration, locations and monitoring techniques must be approved in writing by the London Borough of Tower Hamlets prior to commencement of monitoring.

- 8. No works shall take place (save for demolition works, site preparation, erection of fencing, laying of or provision of any services, laying of temporary surfaces and erection of temporary site buildings for construction purposes) until a remediation scheme to deal with the potential ground contamination of the site has been submitted to and approved in writing by the local planning authority.

- a. Based on the Arup Ground Contamination Risk Assessment and Outline Remediation strategy report dated June 2021, A supplementary site investigation scheme, including groundwater monitoring is required to be submitted, to provide an updated detailed assessment of the risk to all receptors that may be affected, including those off site;
- b. The results of the site investigation and detailed risk assessment referred to in (ii) and based on these an options appraisal and remediation strategy giving full details

- of the remediation and mitigation measures required and how they are to be undertaken;
- c. A verification plan setting out the details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (iii.) are complete to a satisfactory standard; and
- d. A monitoring and maintenance plan, setting out provisions for long-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. The contamination remediation works shall be carried out in accordance with the approved details and completed prior to the first occupation of the development. The provisions of the monitoring and maintenance plan shall be in force from the first occupation of the development and retained for its lifetime.

If during the works any additional contamination is encountered, all works in the relevant part of the site shall cease immediately and not resume until either:

- i. The potential contamination has been assessed and a remediation scheme has been submitted to and approved in writing by the Local Planning Authority, or
- ii. Timescales for submission of a remediation scheme and details of works which may be carried out in the interim have been agreed in writing by the Local Planning Authority.

Any additional land contamination shall be fully remediated prior to the first occupation of the development.

The development shall not be occupied until a verification report, produced post completion of the remediation works, that includes results of sampling and monitoring carried out, has first been submitted to and approved in writing by the local planning authority demonstrating that the site remediation criteria have been met.

9. No demolition or development shall take place until a Written Scheme of Investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

Details of construction control measures to protect unexcavated buried archaeological remains to be preserved in-situ.

The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

10. No plant, water tanks, water tank enclosures, air conditioning units or other structures that are not shown on the approved plans shall be erected upon the roofs of the buildings hereby permitted.
11. Any mechanical plant and equipment within the development shall be designed and maintained for the lifetime of the development so that the rating level of noise does not exceed the typical measured background noise level (LA90, T) without the plant in operation as measured one metre from the nearest affected window of a habitable room in the nearest

affected residential property. The rating level of the plant noise and the background noise level shall be determined using the methods from the version of BS 4142 current at the time of the granting planning permission.

Vibration from the plant hereby approved (when assessed as per advice of the version of BS 6472 current at the time granting of the planning permission) in the centre of any habitable room shall cause vibration no higher than the values equivalent to "low probability of adverse comment" in accordance with BS6472 'Evaluation of Human Exposure to Vibration in Buildings';

No mechanical plant or equipment shall be operated within the site until a post installation verification report, including acoustic test results, has first been submitted to and approved in writing by the Local Planning Authority confirming that the above maximum noise standard has been achieved and that the mitigation measures are robust.

12. No development shall take place until all of the trees within the site and all trees that overhang from adjoining land save for any trees explicitly identified for felling on approved drawings, have been protected in accordance with British Standard 5837 – 'Trees in relation to Construction Sites'

The tree protection measures shall be retained in place for the duration of the construction works and during this period no works other than landscaping works shall be carried out or materials stored within the protected areas underneath the trees.

13. No superstructure works shall take place until an Arboricultural Method Statement and a Tree Planting Methodology in line with BS 8545 are submitted to and approved in writing by the Local Planning Authority.

All planting locations should be chosen to mitigate the amenity impact any tree removals will have on the surrounding area and should also consider post development pressures, such as excessive shade and litter once fully established. A process for planting and maintaining young trees that will result in them successfully establishing in the landscape must be described.

All trees should be planted as a minimum stock size of Semi Mature in line with BS 3936. Tree species will preferably be native to the UK and of a suitable size, shape and form to allow them to reach their intended proportions without significant or regular pruning.

A strategy for how trees within and outside the development redline will be protected during construction and detailing any specialist engineering solutions and methodologies for works close to trees.

If any protected tree on the site dies or is damaged as a result of the construction process, suitable mitigation will be agreed with the Local Planning Authority, which will meet the mitigation planting requirements outlined above as a minimum.

14. All removal of trees, hedgerows, shrubs, scrub or tall herbaceous vegetation shall be undertaken between September and February inclusive.

If this is not possible then a suitably qualified ecologist shall carry out any inspection of the areas concerned immediately prior to the clearance works (preferably within 5 days) to ensure that no nesting or nest-building birds are present. If any nesting birds are present then the vegetation around the nest shall not be removed until an ecologist confirms that the birds have finished nesting.

If no nesting birds are found, there is no need to report the survey findings to the Council before clearance of vegetation. Once the site has been cleared, details of measures taken to ensure no nesting birds were harmed shall be subsequently submitted to and approved in writing by the Local Planning Authority. This could be that the site has been cleared between the months of September and February; that a survey has been undertaken and no nests were found; or that nests were found, protection measures put in place around the nest(s), and a subsequent survey found that birds were no longer nesting.

15. Prior to commencement of landscaping works within each phase, full details of biodiversity mitigation and enhancements shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity enhancements shall include but not be limited to the following:

- a. biodiverse roofs designed in accordance with 'Creating Green Roofs for Invertebrates' best practice guide by Buglife - details provided should include the location and total area of biodiverse roofs, substrate depth and type, planting including any vegetated mat or blanket (though sedum mats should be avoided if possible) and any additional habitats to be provided such as piles of stones or logs;
- b. landscaping to include a good diversity of nectar-rich plants to provide food for bumblebees and other pollinators for as much of the year as possible - details should include species list and planting plans;
- c. climbing plants, in the event of the use of pergolas as part of detailed landscape design in locations not affixed to building facade, including ivy, honeysuckle and jasmine, to provide a further source of nectar and cover for nesting birds such as house sparrows - details to include species and locations of climbers; details to include species and locations of climbers;
- d. water areas designed to provide good wildlife habitat and planted exclusively with native aquatic and wetland species - details to include planting plans, substrate type, depth profile and any features designed to enhance habitat;
- e. external lighting designed in accordance with best practice guidance on bats and lighting published by the Institute of Lighting Professionals, to minimise the light spill onto areas likely to be used by foraging bats - details to include diagrams of existing and proposed light levels across the site;
- f. bat boxes, insect boxes and nest boxes for appropriate bird species such as house sparrow, swift and black redstart - details should include number, locations and type of boxes;
- g. Ecological Management Plan to support long term maintenance and habitat creation;
- h. details of maintenance provisions for all of the above.

The biodiversity improvement measures shall be completed in accordance with the approved details during the first planting season following practical completion of each phase of the development and retained and maintained in accordance with the approved maintenance provisions for the lifetime of the development.

16. No superstructure works shall take place until a landscaping scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of:

- a. Hard landscaping, including palette of high quality, sustainable and inclusive public realm materials including planter enclosures, accessibility features, drainage, kerbs, size and location of permeable and impermeable paving surfaces;
- b. Accessibility and inclusivity, including ground levels, gradients, thresholds and inclusive access provisions, characteristics and features which signal open and public access and belonging, without cues to keep away, or cues of private use;

- c. Soft landscaping, including urban greening integrated through the site including, but not limited to green roofs, green walls, ground surface planting and nature based sustainable urban drainage features integrated with the site design and designed for multiple benefits including recreation, biodiverse habitat and resilience, amelioration of heat and rain events, noise and air quality;
- d. A Landscape Management Plan for lifetime maintenance, giving details of proactive maintenance, including watering provision for soft landscape, appropriate pest control measures not resulting in harm to the planting, monitoring, and remediation to avoid major infestations or damage by non-chemical interventions, ensuring all drainage features fully remain operational, and provide schedules and measures to maintain or improve biodiversity as shown in the Urban Greening Factor details;
- e. Street furniture, including street furniture palette demonstrating contribution to the area's character and supporting infrastructure for active travel, external cycle parking stands, benches, litter bins for separated collection allowing recycling, ash trays, informal and dedicated seating areas, signage and wayfinding measures including Legible London signage, and any other street furniture;
- f. Boundary treatments including number, location, materials and surface finishes and colours of all bollards, fences, gates, railings, walls and other access control measures and means of enclosure;
- g. Environmental measures to make landscape conducive, provisions for use during weather events and other microclimatic considerations such as wind, heavy rain, and heat: shade, shelter and areas of direct sunlight, where possible,;
- h. Public art locations, fixings and materials including surface finishes and colours;
- i. Urban Greening Factor (UGF) and Biodiversity Net Gain (BNG) tables, with a target UGF of 0.3 being secured.

The landscaping scheme shall be completed in accordance with the approved details no later than during the first planting season following practical completion of the development and retained for the lifetime of the development.

Any trees or shrubs which die, are removed or become seriously damaged or diseased following the completion of the landscaping works shall be replaced in the next planting season with the same species or an approved alternative as agreed in writing by the Local Planning Authority.

17. Prior to first occupation of the ancillary residential accommodation, evidence shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that either:

- a. All water network upgrades required to accommodate the additional demand to serve the development have been completed; or
- b. A development and infrastructure phasing plan has been prepared in consultation with Thames Water to allow additional development to be occupied.

Where a development and infrastructure phasing plan is agreed no occupation of the ancillary residential accommodation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

18. The development shall be carried out strictly in accordance with the approved Flood Risk Assessment and Outline Drainage Strategy (by Arup dated June 2024).

19. The proposed development shall be implemented in accordance with the details included within the submitted Fire Statement documents, comprising the Fire Statement (CDL-P4-XX-RPT-FE-0003 P02, 31 January 2025) and the associated Fire Strategy Report (CDL-P4-XX-RPT-FE-0002 P04, 22 November 2024), for the lifetime of the development.

20. Prior to commencement of superstructure works, an overheating strategy for the development shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the GLA.

The approved strategy shall be implemented prior to first occupation of the development and maintained on site. The strategy shall include details of the following for each of the buildings:

- a. Passive measures included in the design and provided by the developer to mitigate against overheating including, but not limited to, floor to ceiling heights of at least 2500mm in living areas in accordance with London Housing Design Guide, internal blinds in bedrooms, glazing g-value of 0.65 or below, and openable windows (with appropriate provision for security on lower floors).
- b. Details of measures that would be installed to prevent overheating in common areas with communal heating pipework in line with objective 3.9 of CIBSE CP1.
- c. Details of any management strategies required to control overheating and information that will be supplied to occupants to support the strategy.
- d. Dynamic modelling, in line with CIBSE TM59, shall be carried out to demonstrate that the measures installed are appropriate to control overheating without the need for mechanical cooling.

21. No development shall take place until a detailed Operational Waste Management Strategy in line with the submitted Circular Economy Statement (Cundall, November 2024) and GLA's Circular Economy Statement Guidance is submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so approved.

Within 3 months of occupation, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials.

22. The deliveries and servicing of the approved uses shall not take place otherwise in accordance with the approved Deliveries and Servicing Plan (Arup, June 2024).

Deliveries and servicing shall take place only within the following hours: 8am - 6pm Monday to Friday, 8am - 1pm Saturdays. No deliveries or servicing shall take place on Sundays or Bank Holidays.

23. No part of the site shall be occupied until 84 car parking spaces have been installed and ready for use in accordance with the approved drawing \*1510\_A\_B4-\_11\_09 Rev 02. Such spaces shall be retained thereafter and shall not be used for any other purpose.

24. 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 and shall not be used for any other purpose..

25. Prior to completion of superstructure works, details of the security measures to the undercroft of St. Mary Grace's Court shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented prior to first occupation of the development. Such measures shall be retained thereafter.

26. Prior to completion of superstructure works, full details of the design and location of hostile vehicle mitigation measures to the rear of the site shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented prior to first occupation of the development. Such measures shall be retained thereafter.
27. No superstructure works shall take place until samples (to be provided on-site) and full specification of all external facing materials to be used in the construction of the development shall be submitted to and approved in writing by the Local Planning Authority.

Details submitted pursuant to this condition shall include but are not restricted to:

- a. Mock-up panels of no less than 1m by 1m of each external cladding material. Details of external cladding, where relevant, shall include all types of brick or other cladding material to be used, details of bond, mortar and pointing for brick and details of joints, panel sizes and fixing method for other types of cladding. If an off-site manufactured cladding system is to be used, full details of the system shall be provided and the mock-up panel shall include at least one junction between pre-assembled panels.
- b. Samples and drawings of fenestration. Details of fenestration, where relevant, shall include reveals, sills and lintels. Drawings shall be at a scale of no less than 1:20.
- c. Drawings and details of entrances. Details of entrances, where relevant, shall include doors, reveals, canopies, signage, entry control, post boxes, CCTV, lighting and soffit finishes. Drawings shall be at a scale of no less than 1:20.
- d. Drawings and details of external facing servicing doors, entrances and access points. Drawings shall be at a scale of no less than 1:20.
- e. Details of any balconies, terraces or wintergardens and associated balustrades, soffits and drainage.
- f. Details of any external rainwater goods, flues, grilles, louvres and vents.
- g. Details of any external plant, plant enclosures and safety balustrades.

28. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking or re-enacting that order with or without modification), no fences, barriers, gates, bollards or other means of enclosure, save for those which comprise part of the development authorised under this planning permission, shall be erected within the site following the practical completion of the development.
29. No new plumbing, pipes, soil stacks, flues, vent grilles, security alarms, wiring and cables or ductwork shall be fixed on the external faces of the building unless as otherwise shown on the drawings hereby approved.
30. Prior to installation, details of any aerials and satellite dishes required for free communication of official purposes under the Vienna Conventions shall be submitted and approved in writing by the Local Planning Authority.

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that principal Order with or without modification), no additional aerials, antennae, satellite dishes or related telecommunications equipment shall be erected on any part of the development hereby permitted, without planning permission first being obtained.

31. The ancillary residential units (marked as 'staff accommodation' on the approved floorplans for Embassy House 1510\_A\_B3b11\_12 to 1510\_A\_B3b11\_23 inclusive, and 'visitor accommodation' on approved plan 1510\_A\_B3b11\_10) provided as part of the approved

development shall be solely for the use of embassy staff and visitors to the embassy. They shall not be sold, leased, or rented to members of the general public.

No part of the proposed development shall be used for overnight accommodation other than the approved ancillary residential units provided as part of the development (marked as 'staff accommodation' on the approved floorplans for Embassy House 1510\_A\_B3b11\_12 to 1510\_A\_B3b11\_23 inclusive, and 'visitor accommodation' on approved plan 1510\_A\_B3b11\_10).

32. The number of units of ancillary residential accommodation that can be used by visitors to the embassy (marked as 'visitor accommodation' on approved plan 1510\_A\_B3b11\_10) shall not exceed 29, shall only be used as temporary sleeping accommodation and shall not be in use by the same occupiers for more than 90 consecutive day stays.
33. The development shall be carried out in accordance with the approved Energy Strategy (by Cundall dated November 2024) and Sustainability Statement (by Cundall dated November 2024). The energy efficiency and sustainability measures set out therein shall be completed prior to the first occupation of the development and retained for its lifetime.

The development shall achieve regulated carbon dioxide emission savings of no less than 50% against the Target Emissions Rate of Part L of Building Regulations (2021) (as amended).

The photovoltaic array system shall be installed prior to the first occupation of the development, have an output of no less than 107kWh and be retained for the lifetime of the development.

All buildings within the development shall achieve a BREEAM UK 2014 Refurbishment and Fit-out rating of 'excellent' or applicable equivalent international standard (including Chinese standards). Within 3 months of first occupation of the development the applicant shall submit the BREEAM certificates or equivalent documentation certified by the relevant awarding body.

The development shall not be occupied until a post completion verification report, including a microgeneration certificate relating to photovoltaic array system, has first been submitted to and approved in writing by the Local Planning Authority to confirm that the above minimum standards have been achieved and that all of the approved energy efficiency and sustainability measures have been implemented.

34. Prior to the commencement of the development hereby permitted, full calculations for heating, cooling & ventilation; equipment data sheets & specifications of all filtration, deodorising systems; and a plan identifying the location of all associated termination points shall be submitted to and approved in writing by the Local Planning Authority. Particular attention shall be given to the discharge of toxic or odorous extract air where a high level of discharge is usually essential.

None of the units shall be occupied until the mechanical ventilation systems have been implemented in accordance with the approved details. The systems shall be retained and maintained in accordance with the approved details for the lifetime of the development.

35. Prior to the occupation of the development, an Events Management Plan (EMP) shall be submitted to and approved in writing by the Local Planning Authority.

The EMP must provide details relating to the control of vehicular and pedestrian operations at the application site and on adjacent highways in relation to the control of crowds in relation to a range of events of different scales. The plan must identify where a minimum of two parking spaces for police vehicles will be provided in consultation with TfL and LBTH adjacent to the application site.

The EMP shall provide for the establishment of steering group (consisting of key statutory authorities and local stakeholders) to inform the management of protests and other large events connected to the development. The key stakeholders should include but not be limited to: Transport for London, the Metropolitan Police, the Local Housing Association managing St Mary Grace's Court, Historic Royal Palaces and Tower Hamlets Council Community Safety Division.

The EMP shall provide details of the measures regulating public access to the Heritage Information Centre following consultation with FCDO on behalf of the UK Government and local emergency services.

Such measures shall be retained thereafter.

36. Prior to the completion of the first floor superstructure of the Cultural Exchange Building an Archaeological and Heritage Outreach and Interpretation Strategy (AHOIS) shall be submitted to the Local Planning Authority. The AHOIS shall be agreed in writing by the Local Planning Authority a minimum of six months prior to the commencement of the Embassy Use.

Prior to submission of the AHOIS the developer shall establish an Expert Steering Group comprised of representatives of interested authorities and bodies to advise in the production and future management of the AHOIS.

The submitted AHOIS shall:

- a. Provide full details as to how the public would be enabled to understand the history of the site, including:
  - (i) its use as a Cistercian Abbey;
  - (ii) its use as a structured Black Death burial ground;
  - (iii) its use as the Royal Navy's victualling yard;
  - (iv) its use as the Royal Mint.
- b. Provide details of a strategy for arranging the display at the Heritage Interpretation Centre of historic material connected to the site.
- c. Provide details of the operational plan of the Heritage Interpretation Centre.

37. The Heritage Interpretation Centre shall be open to members of the public from 10am-4pm Monday-Saturday, with later hours one Wednesday per calendar month opening until 7pm on reasonable occasions and will close on public holidays.

Entrance shall be without charge or incurrence of a booking fee.

Exclusive group booking openings (to serve the needs of local schools, community groups, local history groups and archaeology groups) shall be provided between 10am and 2pm each Wednesday. If such Wednesday group booking openings are not taken up by aforementioned groups, this booking period shall be released for general booking by the public on reasonable occasions and will close on public holidays.

Members of the public shall be able to book a visit in advance, or attend on an ad hoc basis, should spaces remain available.

Individuals seeking to make a booking shall be required to provide a lead name and email address only. Attendees on the day shall be granted access without the requirement for personal information.

## **Annex C – Consolidated Drawing Schedule and revised drawings**

This is a separate document file. It can be found on the gov.uk website alongside the published copy of the decision letter, at the following address:

<https://www.gov.uk/government/publications/called-in-decision-royal-mint-court-london-ec3n-4qn-refs-3353754-and-3353755-20-january-2026>



Planning Inspectorate

# Report to the Secretary of State

by Claire Searson MSc PGDip BSc (Hons) MRTPI IHBC

Inspector appointed by the Secretary of State

Date 10 June 2025

## TOWN AND COUNTRY PLANNING ACT 1990

### APPLICATION BY:

**Chinese Embassy in the UK**



Inquiry opened on 11 February 2025. Site visits made on 12 and 20 February 2025.

Royal Mint Court, London EC3N 4QN

File Refs: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755

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## LIST OF ABBREVIATIONS

TERM	DEFINITION/DESCRIPTION
AHOIS	Architectural and Heritage Outreach Interpretation Strategy
CA	Conservation Area
CAZ	Central Activity Zone
CCTV	Close Circuit Television
CCCUK	China Chamber of Commerce in the UK
CCP	Chinese Communist Party
CD	Core Document
CDN	China Dissent Network
CFOA	City Fringe Opportunity Area
CMC	Case Management Conference
CTSA	Counter Terrorism Security Advisor
DAC	Deputy Assistant Commissioner
DAS	Design and Access Statement
EIA	Environmental Impact Assessment
EMP	Events Management Plan
ES	Environmental Statement
EVCP	Electric Vehicle Charging Point
FCDO	Foreign Commonwealth and Development Office
FOSKD	Friends of St Katharine's Docks
GLA	Greater London Authority
GLAAS	Greater London Archaeological Advisory Service
HE	Historic England
HIC	Heritage Interpretation Centre
HRP	Historic Royal Palaces
HO	Home Office
HVM	Hostile Vehicle Mitigation
INQ	Inquiry Document
IP	Interested Parties
IPAC	Inter-Parliamentary Alliance on China
LAMAS	London and Middlesex Archaeological Society
LBTH	London Borough of Tower Hamlets
LP	London Plan (2021)
LPA	Local Planning Authority
LVMF	London View Management Framework
MPS	Metropolitan Police Service
NPPF	National Planning Policy Framework
OA	Opportunity Area
OUV	Outstanding Universal Value
PCLA	Pedestrian Comfort Level Assessment
PINS	Planning Inspectorate
PLBCAA 1990	Planning (Listed Building and Conservation Areas) Act 1990

PoE	Proof of Evidence
PPG	Planning Practice Guidance
PRC	Peoples Republic of China
PRfR	Putative Reason for Refusal
RMCRA	Royal Mint Court Residents Association
SDC	Strategic Development Committee
SM	Scheduled Monument
SoC	Statement of Case
SOCG	Statement of Common Ground
SoS	Secretary of State
TCPA 1990	Town and Country Planning Act 1990
TfL	Transport for London
THLP	Tower Hamlets Local Plan 2020
ToL	Tower of London
TRA	Tenant and Residents Association (Royal Mint)
TVIA	Townscape and Visual Impact Assessment
UK	United Kingdom
UNESCO	United Nations Educational, Scientific and Cultural Organisation
US	United States (of America)
WHS	World Heritage Site

**File Refs: APP/E5900/V/24/3353754 & APP/E5900/V/24/3353755**  
**Royal Mint Court, London EC3N 4QN**

- The applications were called in for decision by the Secretary of State by a direction, made under section 77 of the Town and Country Planning Act 1990, on 14 October 2024.
- The applications are made by Chinese Embassy in the UK to the London Borough of Tower Hamlets.
- The planning application and listed building consent application Refs PA/24/01229/A1 and PA/24/01248/NC are dated 15 July 2024.
- The development proposed is described as "*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. [This application is accompanied by an Environmental Statement].*"
- The works proposed are described as "*Refurbishment and restoration of the Johnson Smirke Building (Grade II\* listed), partial demolition, remodelling and refurbishment of the Seaman's Registry (Grade II listed), with alterations to the west elevation of the building, the retention, along with part demolition and alterations to the existing boundary wall and front railings and demolition of substation, associated landscaping, and all ancillary and associated works.*"
- The reason given for making the direction was in light of her policy, the Secretary of State has decided to call in these applications.
- On the information available at the time of making the direction, the following were the matters on which the Secretary of State particularly wished to be informed for the purpose of her consideration of the application:
  - a) The extent to which the proposed development is consistent with Government policies for 'Conserving and Enhancing the Historic Environment' in the NPPF (Chapter 16);
  - b) The extent to which the proposed development is consistent with the development plan for the area; and
  - c) Any other matters the Inspector considers relevant.

**Summary of Recommendation: The applications be approved and planning permission and listed building consent be granted, subject to conditions.**

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**1. PROCEDURAL MATTERS**

- 1.1 This report relates to two related applications for planning permission and listed building consent at the same site for the same scheme under different, complimentary legislation. I have dealt with these together.
- 1.2 The applications were recovered for determination by the Secretary of State (SoS) by a direction dated 14 October 2024. Following this, the London Borough of Tower Hamlets (LBTH) resolved<sup>1</sup> to inform the SoS

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<sup>1</sup> Via its Strategic Development Committee

that planning permission should be refused. While the minutes<sup>2</sup> list a number of grounds of objection, a single putative reason for refusal was given, relating to community and highway safety.

1.3 The Strategic Development Committee (SDC) also resolved that it would have refused listed building consent, however following further consideration it was decided not to oppose this application.<sup>3</sup>

1.4 A Case Management Conference (CMC) was held on 19 December with the applicant, LBTH and the Royal Mint Court Residents Association (RMCRA) as a 'Rule 6' Party.<sup>4</sup>

1.5 On further consideration after the CMC, LBTH issued a revised Statement of Case (SoC).<sup>5</sup> This confirmed that they were no longer in a position to support the putative reason for refusal and that LBTH would present no evidence to the Inquiry in this regard. The reason for this was that the Metropolitan Police Service (MPS), who had been intending to appear giving expert evidence for LBTH, had revised their position and were no longer maintaining their objection to the scheme.<sup>6</sup>

1.6 For separate reasons, RMCRA also confirmed on 14 January 2025 that they were no longer in a position to act as a formal 'Rule 6' party to the Inquiry. They confirmed that would be participating as an interested party (IP) only and that their SoC and written representations should be treated as an IP comment on the application.

1.7 A further CMC was held on 20 January 2025 to discuss the revised handling of the Inquiry.<sup>7</sup> At that CMC, a request was made by the applicant to change the procedure to written representations, instead of an Inquiry. I confirmed in my post CMC note that, based on the call-in letter which specified that an Inquiry should be held, I was required to consider the applications through the Inquiry procedure and report my recommendations to the SoS.<sup>8</sup>

1.8 On 10 February 2025, I issued a formal ruling.<sup>9</sup> This was also read out as part of my opening on the 11 February. The ruling was made in response to a formal request from Rt Hon Robert Jenrick MP on 6 February 2025.<sup>10</sup> The request was for me to exercise my power of summons under s250 of the Local Government Act 1972 to require the attendance of named Officers from the MPS and LBTH to provide documentation and correspondence. The reason for the request related to a concern regarding a lack of evidence pertaining to the change of position by LBTH and MPS.

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<sup>2</sup> CD9.05

<sup>3</sup> See CD9.06 and CD9.08 for details.

<sup>4</sup> CD3.05 & 3.06

<sup>5</sup> CD9.07

<sup>6</sup> See CD9.08 appendix 8 and CD12.01

<sup>7</sup> CD3.08

<sup>8</sup> Ibid, paragraphs 2-8

<sup>9</sup> CD3.12

<sup>10</sup> CD12.185

- 1.9 The MPS provided a response to this request<sup>11</sup> where they set out a timeline of involvement in the application and details of why they changed their position.
- 1.10 My ruling was that I did not consider it necessary to exercise my power of summons. However, representatives from the MPS attended the Inquiry on Thursday 23 February to answer my questions relating to security and policing matters at my request. I set out in full the nature of the request, the background within my ruling. I will come to matters relating to the MPS/change in stance later in my report.
- 1.11 The Inquiry opened on 11 February 2025 and closed on 19 February. An accompanied site visit to the application property took place on 12 February.<sup>12</sup> A further unaccompanied site visit to see other London Embassies took place on 20 February.<sup>13</sup>
- 1.12 Due to specific complexities (discussed later in this report), the final set of conditions and a final draft Obligation were submitted after the close of the Inquiry, on 18 March 2025.<sup>14</sup> The signed Obligation was submitted on 1 May 2025.<sup>15</sup>
- 1.13 At the first day of the Inquiry, a significant number of IPs attended in person and the number of people exceeded the venue capacity. In order to manage this, the opening was delayed and LBTH found an additional area within the Inquiry building so that IPs could view the proceedings via the livestream. Accordingly, there was no prejudice in this regard. On subsequent sitting days the Inquiry was well attended but did not exceed the capacity of the Inquiry room.
- 1.14 The recordings of the livestreaming are available at: [Webcast library - Tower Hamlets Council webcasts](#)
- 1.15 A Core Documents (CD) library was established in advance of the Inquiry. Documents were also submitted during the course of the Inquiry. Details of these and how to access them are annexed to this report. I am grateful to David Mason, the Programme Officer, for his assistance with the running of the Inquiry.
- 1.16 A Statement of Common Ground (SOCG) was agreed between the applicant and LBTH after the change in stance of the authority.<sup>16</sup> I deal with this below.
- 1.17 This report contains a description of the site and its surroundings, an explanation of the planning history and proposals, agreed matters, the Environmental Statement, identification of relevant planning policies, the gist of the submissions made at the Inquiry and in writing, and conditions

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<sup>11</sup> CD12.186

<sup>12</sup> INQ10

<sup>13</sup> INQ26

<sup>14</sup> INQ31 & INQ32

<sup>15</sup> INQ34

<sup>16</sup> INQ24

and the planning obligation. This is then followed by my conclusions and recommendation. Lists of appearances are annexed.

## 2. THE SITE AND SURROUNDINGS

2.1 Occupying around 2.10 hectares, the application site is bounded to the north by Royal Mint Street, by East Smithfield to the south and Mansell Street to the west. Residential buildings at St Mary Grace's Court share the eastern boundary of the site, with Cartwright Street beyond. There is a private rear servicing road to the rear of the site, at basement level, which has a one-way operation accessed via ramps from East Smithfield and exiting to Royal Mint Street.

2.2 For ease of reference, the application site, relevant heritage assets which are referenced in this section are all depicted on the map below.<sup>17</sup>



2.3 The site is a relatively complex one which contains a number of buildings and structures:

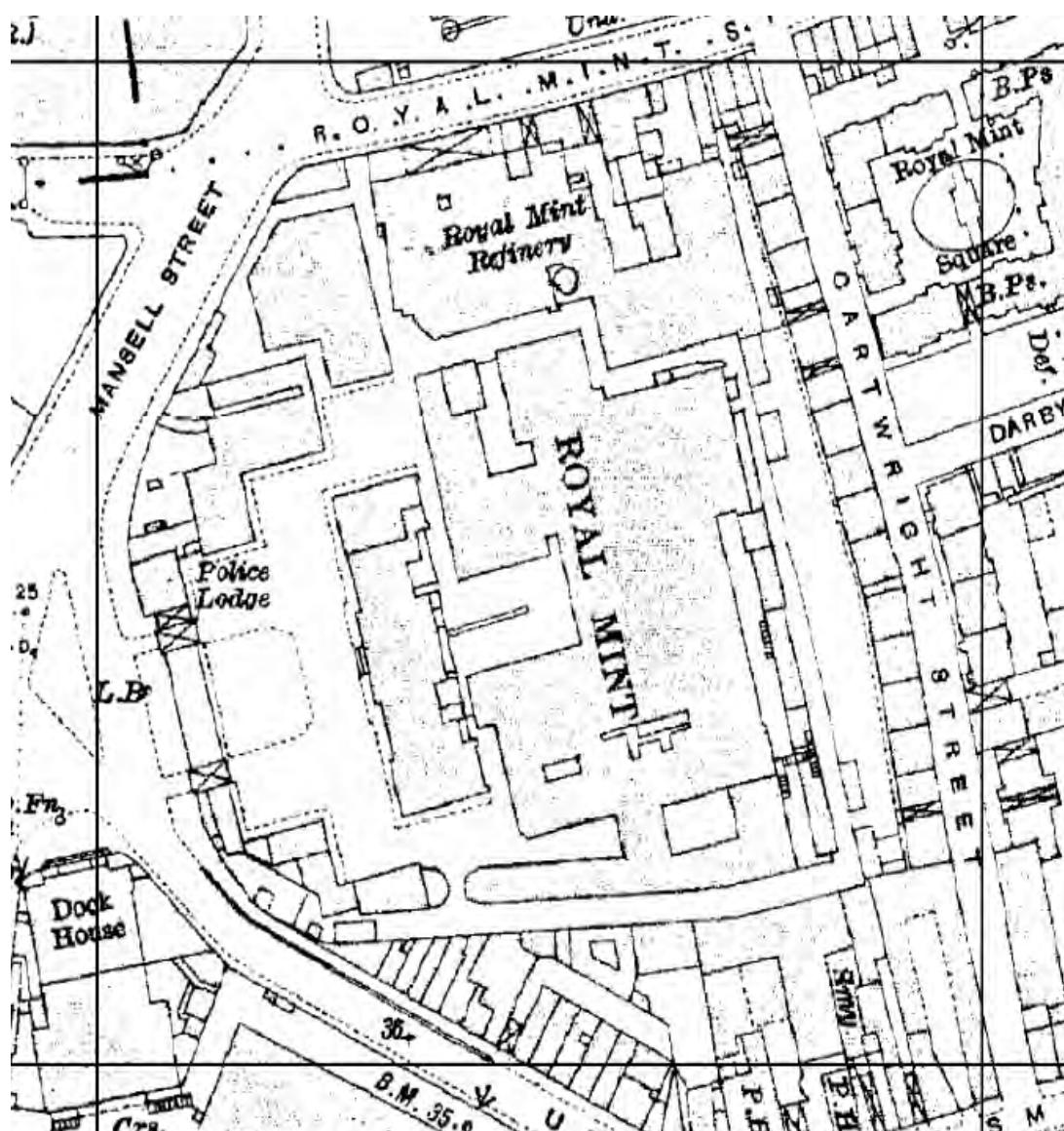
- The Johnson Smirke Building (Grade II\*)
- The Seaman's Registry (Grade II)

<sup>17</sup> Taken from CD11.03 p10

- Murray House and Dexter House (non-listed)
- Two cast iron lamp standards (Grade II)
- Entrance Lodges (Grade II)
- The boundary wall (curtilage listed structure)

2.4 The site was the home of the Royal Mint from 1809, when it moved from the Tower of London. Before this, it was also the site of a burial ground dated to 1348-1350 during the Black Death, a Cistercian Abbey 'St Mary Grace's' built in 1350. Following the Reformation, the site was used as the first naval victualling yard and following its closure in 1785, as a series of tobacco warehouses.

2.5 As the Royal Mint, the site was an industrial one which developed over the 19<sup>th</sup> and 20<sup>th</sup> centuries.<sup>18</sup>



<sup>18</sup> 1916 OS Map showing the extent of buildings within the site. (CD1.14 p23).

2.6 The Royal Mint suffered damage during WWII. In 1967 it was announced that the mint would move to a new facility in Wales, after which much of the site was cleared. Extensive redevelopment of the site took place 1986-1988 comprising offices, houses, a community centre, shops and leisure facilities. Murray House and Dexter House were developed as part of this.<sup>19</sup>



2.7 The site boundary excludes the telephone exchange building which stands between Seamans Registry and Dexter House, accessed from Royal Mint Street.

2.8 In terms of the surrounding area, Royal Mint Court is located to the north-east of the Tower of London and to the north of St Katharine's Docks. The area comprises a mix of commercial, residential and tourist uses.

2.9 St Mary Grace's Court is a part-2, part 4 and part-5 storey residential building which is located to the rear of the site, accessed from Cartwright Street. The rear carpark and gardens serving these properties shares the boundary with the site. A sub-level parking and storage area within the application site, serviced via the ramped service road, is located partially under the rear carpark and gardens at St Mary Grace's Court, with a retaining wall and fence atop. St Mary Grace's Court is also known as Royal Mint Court.

2.10 Also adjacent to the site is Royal Mint Gardens, a recent development ranging from 3-15 storeys of 4-linked residential buildings along Royal Mint Street. An unbuilt phase of the site lies at the corner with Mansell Street and is planned to include a hotel.

2.11 The site is located on the strategic road network with important links to east London and south London, across Tower Bridge. The site is well connected to public transport links, including Tower Hill Underground Station, Tower Gateway Docklands Light Railway, Fenchurch Street Railway Station and various bus routes. Accordingly, there is a PTAL rating of 6a and 6b.

2.12 Royal Mint Court is located in the western part of the LBTH, adjacent to the City of London.

2.13 The site has a number of planning designations including:

- Central Activities Zone (CAZ)

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<sup>19</sup> Drawing of Royal Mint by TH Shepherd, 1830 (CD1.14, p17) and image of the cleared site prior to 1986 redevelopment (CD11.03, p9)

- City Fringe Opportunity Area (CFOA)
- Thames Policy Area
- Protected Vista of the Tower of London from City Hall
- Preferred Office Location (POL) 'Around Tower Gateway West'
- City Fringe Sub Area
- The Tower Conservation Area (ToLCA)
- Archaeology Priority Area (Tier 1): Tower of London, St Mary Grace's and Tower Hill
- Green Grid Buffer Zone
- Area of poor air quality (NO<sub>2</sub> annual mean concentration >40 (ugm-3)).

### **3. RELEVANT PLANNING HISTORY**

- 3.1 The site has been largely vacant since 2013. In 2017 full planning permission (PA/16/00479) was granted for the redevelopment of the site, together with the relevant Listed Building Consent (PA/16/00480). The proposals were for redevelopment for 81,000sqm of employment-led mixed-use development. This permission was not implemented and has now expired.
- 3.2 The applicant acquired the site in 2018 and following a period of pre-application discussions, submitted applications for planning and listed building consent in June 2021.<sup>20</sup>
- 3.3 The applications were recommended for approval by the Planning Officers, however Members of the SDC resolved to refuse both applications, and permission was refused on 10 February 2023.<sup>21</sup>
- 3.4 A detailed planning history is set out in the SOCG<sup>22</sup> which includes the reasons for refusal for the original applications. The applicant did not appeal these decisions.

### **4. THE PROPOSALS**

- 4.1 The proposals are for the comprehensive redevelopment of the site for use as an embassy (Sui Generis use class). The total floorspace proposed would be around 52,000sqm. F
- 4.2 The 2024 applications comprise the same proposals submitted in 2021, which have been updated to reflect current legislative requirements and to incorporate minor design changes.

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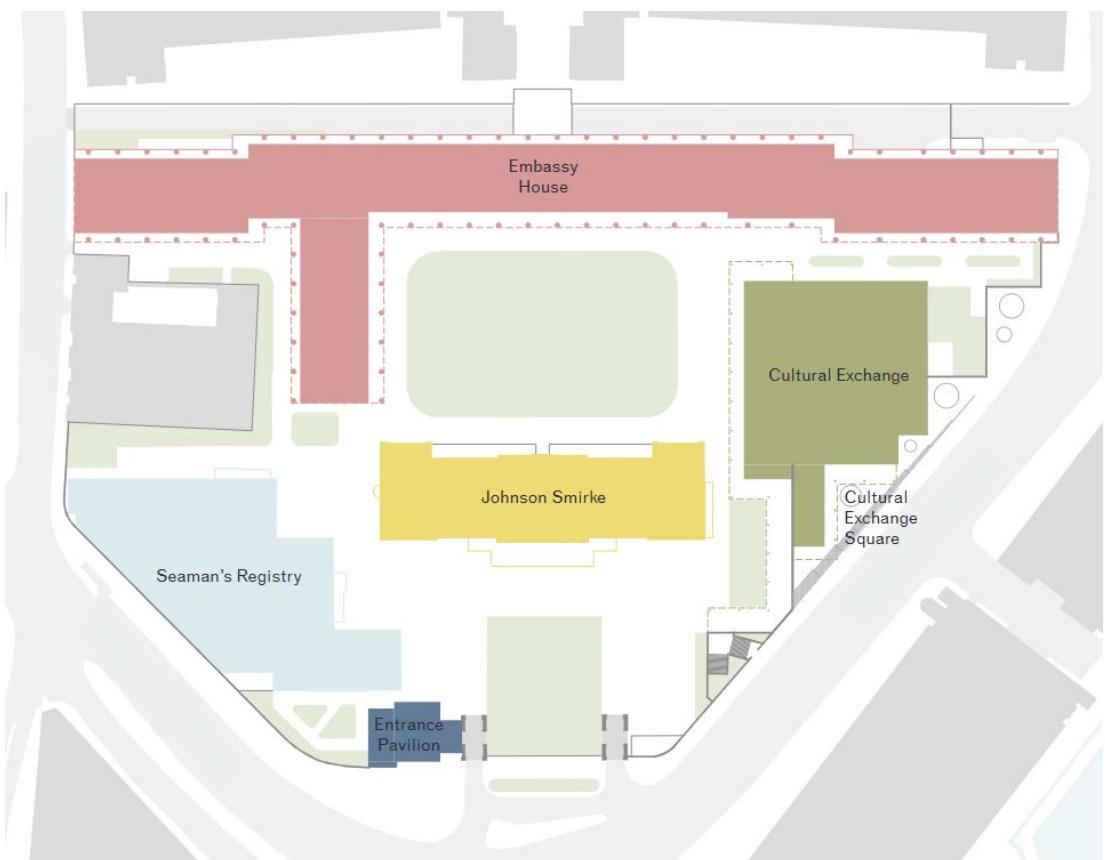
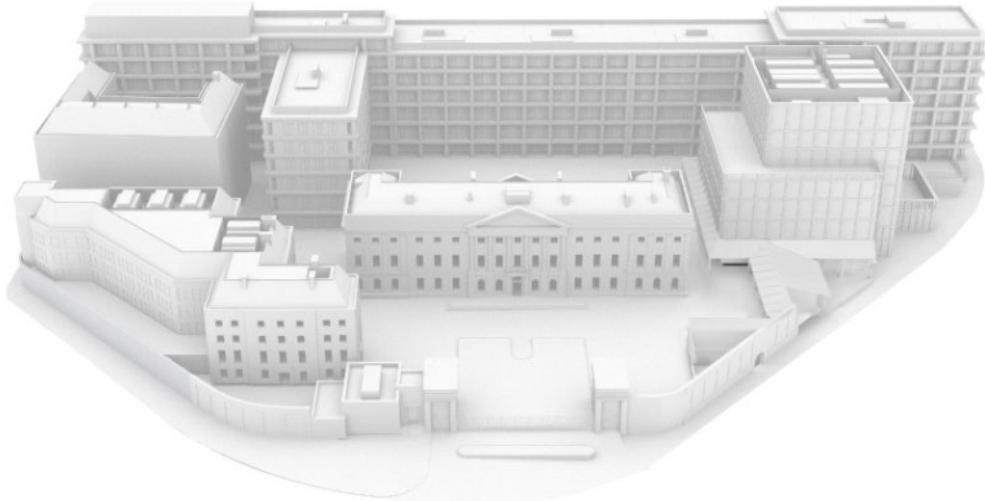
<sup>20</sup> References PA/21/01349 and PA/21/01327

<sup>21</sup> See CD9.01-9.03 and CD9.09

<sup>22</sup> INQ24 Section 6

4.3 Detailed descriptions of the proposals are best found in the Design and Access Statement (DAS)<sup>23</sup> as well as the Proof of Evidence (POE) from the scheme Architect<sup>24</sup> and their presentation to the Inquiry.<sup>25</sup>

4.4 The drawings below, taken from the DAS show the proposed site arrangements (in 3D and in proposed plan form).



<sup>23</sup> CD7.07

<sup>24</sup> CD11.03

<sup>25</sup> INQ11

4.5 In summary, the proposals can be described as follows:

*Johnson Smirke Building*

4.6 This would be used to host ceremonial diplomatic receptions and gatherings, with a series of reception, banqueting, and meeting rooms to the ground floor. Upper floors would comprise a mix of cellular and open plan office accommodation on the upper floors. The basement would house services such as kitchens, car parking and loading bays for delivery and servicing vehicles.

4.7 Alterations to this Grade II\* listed building include the following:

- Reconfiguration of the main entrance and southern side entrance steps in matching stone to provide a fully inclusive design for access to the building.
- Cleaning of the masonry façades with localised repairs.
- Retention, refurbishment and redecoration of the existing (non-original) sash windows and doors.
- Demolition and making good of the 1980s steps and ramp on the north wing of the rear elevation, including reinstatement of the window.
- Demolition of two dormer windows on the north-east corner of the roof to allow the installation of ventilation louvres below parapet level.
- Localised demolition in the central portion of the building, removing the two 1980s lift shafts and a small portion of the original brick party wall at ground floor to create a new symmetrically arranged entrance hall designed to match the existing remaining historic fabric.
- Stripping out of the 1980s fit out of all of the office interiors throughout the building.
- Enlargement of the 1980s north and south side stair cores to include new lifts and additional riser space.
- Upgrading of the thermal performance of all external walls, roof and basement using a breathable construction to protect the historic fabric.
- Installation of secondary glazing to improve thermal and security performance of all windows.

4.8 The proposed east and west elevations, taken from the DAS, are shown below:<sup>26</sup>

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<sup>26</sup> CD7.07 p197



4.9 The forecourt area in front of the Johnson Smirke Building would also be subject to landscaping proposals. A new entrance plinth incorporating steps and a ramp is provided to the front of Johnson Smirke improving accessibility. A flagpole and flag would be installed in this area. Two trees would be retained with crown lifting works. The grade II listed lamp standards would be retained and refurbished.

*Seamans Registry*

4.10 This would provide the main office functions for the embassy. The ground floor would have diplomatic reception and meeting spaces and the upper floors would be used for administrative offices. The basement would contain back of house ancillary accommodation such as plant and storage.

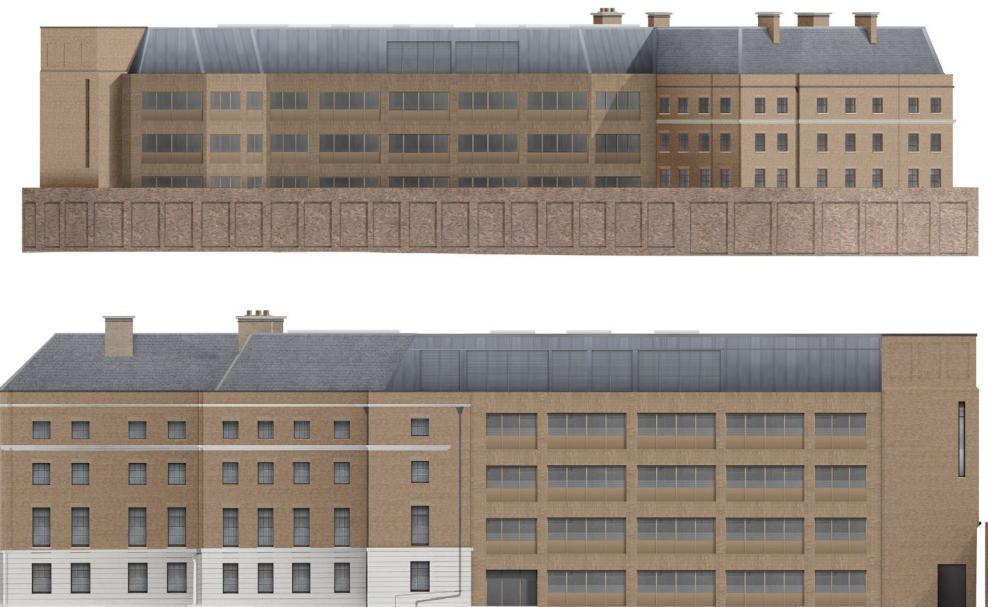
4.11 This building was heavily altered during the 1980s works, and historic fabric is limited to its southward-facing stepped façade. Minimal refurbishment is proposed to the historic Georgian elevations facing the Johnson Smirke Building. The works would also include the existing (modern) sash windows to be retained and redecorated as well as insulation and secondary glazing.

4.12 The 1980s wall that was constructed adjoining the southwest corner of the building will be removed and made good, which would make the Seamans Registry a freestanding structure in the forecourt of Royal Mint Court.

4.13 The 1980s extensions would be retained and upgraded. The façades facing onto Mansell Street and to the east would be removed and the stepped profile of the Mansell Street façade would be reconfigured as a vertical elevation running parallel to Mansell Street book-ended by the

return corners of the existing brick walls to the east and west. The same architectural approach would be taken on the infill façade on the east elevation. New exterior façades would be finished in brick, metal and glass.

4.14 The proposed north-west and the proposed north-east elevations as shown in the DAS are illustrated below:<sup>27</sup>



*Embassy House*

4.15 This would be a conversion of the existing Murray and Dexter House to create ancillary residential accommodation. The conversion would retain the steel frame and composite slab of the building, and the 7 internal cores.

4.16 The primary entrance would be from the central courtyard within the embassy complex and from Cartwright Street to the East.

4.17 The ground floor would comprise social and recreation space and the basement would be used for car and cycle parking, as well as plant, refuse rooms and storage. Vehicles using this area would access it via East Smithfield gated entrance and ramp.

4.18 The upper floors would comprise 29 studios and 197 one, two and three bed accommodation units and amenity space at roof level. The units would be served by balconies which would be created by setting back the glazing from the floorplate edge as part of the conversion.

4.19 Materials would comprise concrete cladding and screens, glazing and metal balustrading. The eastern boundary with St Mary Grace's Court would have a 3m high timber clad steel security fence. This would run on top of the existing service road retaining wall.

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<sup>27</sup> CD7.07 p219

4.20 The proposed Embassy House is where minor design changes have occurred from the original 2021 application. Two sets of design amendments were submitted, firstly in December 2024 and then on 2 February 2025. These relate to additional fire safety measures and involve changes to the internal layouts and the removal of one car parking space from the basement area. The amendments would not affect the external appearance of the proposals or affect the unit mix, or amenity issues.<sup>28</sup>

4.21 The central courtyard area to the front of the Embassy House would maintain the current suspended raised slab which sits over monastery ruins at basement level. It would be relandscaped to make it accessible and would incorporate tree and tall planting, along with pathways and an events space.

4.22 The proposed west and east elevations, as shown in the DAS, are below:<sup>29</sup>



#### *Cultural Exchange*

4.23 This would extend over 6-floors and would be a mixed-use building for visa services, cultural events, conferencing and lectures and would also incorporate VIP, office and canteen space. It would be formed by the partial demolition and conversion of the eastern wing of Murray House which would create a separate stand-alone unit from Embassy House.

4.24 The lower ground floor would incorporate an external public access from East Smithfield for visa services. It would also incorporate a Heritage Interpretation Centre (HIC) which would include exhibition space and would also allow views into the existing Abbey Ruins which are currently preserved in-situ in the basement area of Murray House.

4.25 The upper ground floor would be accessed via an enclosed single storey pavilion at ground floor, located at the west end of the Johnson Smirke forecourt as a formal ceremonial entrance.

<sup>28</sup> A full summary is helpfully given in INQ11 p85-94

<sup>29</sup> CD7.07 p334

4.26 Materials would be Celadon-coloured glazed tiles for the façade with bronze coloured window openings. The proposed west façade from East Smithfield and from the forecourt are shown below:<sup>30</sup>



<sup>30</sup> CD11.03 p95 & 97

*Public Perimeter*

- 4.27 The proposals also include a number of works to the external perimeter of Royal Mint Court. The Grade II listed entrance lodges would be retained. The 1980's curved substation which is attached to the north lodge would be demolished and replaced with a new brick built entrance pavilion to provide a security lobby for visitors to the site. A stone portico that was previously removed from the west elevation of the Seaman's Registry Building and used within the forecourt area would be retained and repurposed as the surround to form the internal east elevation of the proposed pavilion.
- 4.28 The lodges would be repaired and maintained with the lodges allowing vehicular access into the forecourt of Royal Mint Court.<sup>31</sup> The render to the south lodge adjoining wall would be removed to expose its original brick finish. The historic front wall between the two lodges would also be repaired and the 1980's replica railings will be stretched by 70cm for security.
- 4.29 To the front, existing pedestrian areas would be improved with yorkstone paving and the level changes within this area would be addressed as part of the proposals. Granite would be used to delineate the vehicular surfaces, including for the existing taxi rank. Hostile Vehicle Mitigation (HVM) will be integrated as part of the scheme including a raised planter, bollards and HVM cycle stands.
- 4.30 The existing stock brick wall to Mansell Street and East Smithfield is a curtilage listed structure. To Mansell Street, the wall would be cleaned and repaired, as well as infilling a modern opening which currently leads into Seamans Registry behind. Stone panels with details are the history of the site are proposed to be installed in the inset areas of the wall.
- 4.31 The boundary wall to East Smithfield from South Lodge would also be cleaned and repaired. An existing entrance to the public underground passage leading to the Tower of London would be retained and improved with increasing the height of walls for security and increased lighting. A stairway leading into the site from this area would also be removed. Around 12m of boundary wall further south along East Smithfield would be removed, and the area would be opened out to create a public square the HIC and a new pedestrian area called Exchange Square.
- 4.32 The new public square would incorporate new paving and landscaping, including HVM planters. Embassy visa services would be accessed directly off this new square as well as the HIC. The glazed design of the HIC would allow views into the ruins from the Square.
- 4.33 The current one-way vehicular access to the service road from East Smithfield would be altered and made two-way operation. Access to Royal Mint Street from the other end of the service road would remain exit only.

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<sup>31</sup> The north lodge would be used for entry and exit while the southern lodge would provide back up for emergency services access.

4.34 To Cartwright Street, the existing reinforced concrete bridge which leads from the rear of Dexter House above the service road would be replaced with a new steel framed bridge which would incorporate raised HVM planters. Other works to the public realm outside of this entrance, between the two existing employment buildings, would also be undertaken, including additional trees and HVM planters.

## **5. THE ENVIRONMENTAL STATEMENT**

5.1 An Environmental Statement (ES) accompanied the original planning application in 2021. The 2024 planning application is accompanied by the 2021 ES<sup>32</sup> and an ES addendum.<sup>33</sup>

5.2 In particular, the ES addendum considers whether the baseline conditions, assessment scope and methodology of the 2021 ES still remain appropriate and valid for the purposes of assessing the likely significant effects of the proposals. Together the ES and ES Addendum report the likely significant effects of the Amended Proposed Development

5.3 I am satisfied that these documents meet the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), and I have taken them into account in my consideration of the applications.

## **6. LEGISLATIVE AND POLICY CONSIDERATIONS**

6.1 The development plan comprises the London Plan March 2021 (LP)<sup>34</sup> and the Tower Hamlets Local Plan 2020 (THLP).<sup>35</sup> The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are material considerations.

6.2 LBTH is in the process of developing a new Local Plan,<sup>36</sup> however as this is at an early stage, no party relied on this for these applications.

6.3 A significant number of relevant policies from both the LP and THLP are identified in the SOCG, along with a number of other documents also deemed to be material. I set out below the details of those which are most pertinent to these applications, grouped into themes.

### *Growth*

6.4 The concept of 'Good Growth' underpins the LP and its policies. This is growth that is socially and economically inclusive and environmentally sustainable. Policy GG1 relates to building strong and inclusive communities and includes ensuring that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety. GG2 identifies the need to make the best use of land, including enabling the development of brownfield land and applying a design-led approach.

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<sup>32</sup> See CD2

<sup>33</sup> See CD8

<sup>34</sup> CD5.02

<sup>35</sup> CD5.03

<sup>36</sup> CD5.37

6.5 Policy GG3 seeks to create a healthy city and GG4 relates to the delivery of good quality homes. GG5 aims to conserve and enhance London's global economic competitiveness. Policy SD10 relates to strategic and local regeneration and tackling inequality.

6.6 Building on the LP policies, the THLP S.SG1 deals with areas of growth and opportunity. S.SG2 relates to delivering sustainable growth through good design and preserving and enhancing character and setting of an area and not resulting in unacceptable impacts on the historic environment, transport capacity and infrastructure. D.SG3 relates to health impact assessments.

*Land use*

6.7 The LP identifies a Central Activity Zone (CAZ) a designation which covers the central part of London, as one of the world's most attractive and competitive business locations. SD4 sets criteria for the CAZ, including relating to the protection and enhancement if of unique international roles based on an agglomeration and rich mix of strategic functions (criterion A). It also requires the promotion of the CAZ as a centre of excellence and specialist clusters such as state, health, law education, creative and cultural activities (Criterion D). The safety, security and resilience of the CAZ should also be promoted working with businesses and communities (Criterion J). Paragraph 2.4.4 of the supporting text to this policy sets out the strategic functions of the CAZ, including diplomatic organisations such as embassies.

6.8 SD1 Relates to Opportunity Areas which are significant locations with development capacity to accommodate new housing, commercial development and infrastructure. It identifies the CFOA, which abuts the CAZ boundary, as shown on figure 2.11.

6.9 SD5 relates to offices, strategic functions and residential development within the CAZ. SD6 seeks the promotion of the vitality and viability of London's town centres with SD7 setting out development principles in town centre areas and SD8 relating to the town centre network.

6.10 E1-E4 deal with employment relating to offices, suitable business space, affordable workspace and servicing. Quality, flexibility and diversity underpin these policies recognising the unique agglomerations and dynamic clusters of world city businesses and other specialist functions.

6.11 THLP Policy S.TC1 supports the CAZ designation as outlined by the LP. S.H1 relates to meeting housings needs and S.EMP1 and D.EMP2 relate to the creation of investment and jobs within the CAZ and secondary POLs new employment space, including protecting the Borough's global, national, regional and local economic roles in delivering jobs and supporting businesses.

6.12 Paragraph 124 of the NPPF seeks to promote and effective use of land in meeting the need for homes and other uses. Paragraph 125d promotes the development of under-utilised land and buildings.

6.13 Other material considerations include the City Fringe Opportunity Area Planning Framework (2015).<sup>37</sup>

*Heritage*

6.14 The LP recognises that London's historic environment provides a depth of character that benefits the city's economy, culture and quality of life. London's heritage assets and historic environment are irreplaceable and are an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth. The general theme of the LP and THLP Policies is that proposals should conserve and enhance the significance of heritage assets (and their settings).

6.15 In particular, LP policy HC1 deals with heritage conservation and growth and seeks the effective integration of London's heritage in regenerative change by recognising and embedding the role of heritage in place making, utilising the heritage significance of a site or area in the planning and design process, integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place and delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

6.16 HC2 relates to World Heritage Sites (WHS). Development proposals in a WHS and their settings should conserve, promote and enhance their Outstanding Universal Value (OUV), and they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes and support their management and protection.

6.17 HC3 deals with designated strategic views of which development proposals must be assessed for their impact. HC4 deals with London View Management Framework (LVMF) requiring that proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.

6.18 The THLP builds on the LP policies, recognising the very rich heritage in Tower Hamlets and its exceptional importance. S.DH3 deals with heritage and the historic environment and S.DH5 with WHSs.

6.19 Statutory duties are also laid down by the Planning Listed Building and Conservation Areas Act 1990 (PLBCAA 1990) in sections 16, 66 and 72. Special regard must be had to the desirability of preserving a LB or its setting and special attention must be paid to the desirability of preserving or enhancing the character or appearance of a CA.

6.20 Paragraph 212 of the NPPF states that great weight should be given to the conservation of a heritage asset and the more important the asset, the greater the weight should be. Paragraph 213 states that any harm to the significance of designated heritage assets (including from

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<sup>37</sup> CD5.13

development within its setting) should require clear and convincing justification. Paragraph 214 states that where a development proposal will lead to less than substantial harm, this should be weighed against the public benefits of the proposal.

6.21 Paragraph 219 states that local planning authorities should look for opportunities for new development within a CA and WHS and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. The glossary of the NPPF defines significance and setting.

6.22 Other material considerations relating to heritage include:

- Tower of London World Heritage Site Management Plan (2016)<sup>38</sup>
- Tower of London World Heritage Site Local Setting Study (2010)<sup>39</sup>
- GLAAS Guidance for Archaeological Priority Areas (2016)<sup>40</sup>
- Guidance and Toolkit for Impact Assessment in a World Heritage Context (UNESCO 2022)<sup>41</sup>
- Historic England (HE) Good Practice Advice (GPA) 2 - Managing Significance in Decision-Taking in the Historic Environment, July 2015<sup>42</sup>
- HE GPA 3 – The Setting of Heritage Assets (2nd Edition), December 2017<sup>43</sup>
- London World Heritage Sites Supplementary Planning Guidance 2012 (SPG)<sup>44</sup>

### *Design*

6.23 In planning for growth, the LP contains a suite of policies relating to design. Policy D1 is an overarching policy in this regard and D2 deals with infrastructure requirements for sustainable densities.

6.24 D3 requires that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth. Detailed criteria are set out in terms of form and layout, experience and quality and character, the latter of which requires development to:

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<sup>38</sup> CD5.08

<sup>39</sup> CD5.09

<sup>40</sup> CD5.10

<sup>41</sup> CD5.33

<sup>42</sup> CD5.34

<sup>43</sup> CD5.35

<sup>44</sup> CD5.19

- respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
- be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
- aim for high sustainability standards
- provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

6.25 D4 is concerned with the delivery of good design, through detailed analysis, scrutiny and maintaining design quality through to completion. D5 seeks to secure inclusive design, taking into account London's diverse population and be able to be entered, used and exited safely, easily with dignity for all.

6.26 D8 sets out a number of detailed criteria in respect of public realm improvements, including ensuring that the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.

6.27 Tall Buildings proposals are covered by D9 where the policy sets out requirements for Boroughs to specific locations where tall buildings development are acceptable (D9b) as well as specifying detailed criteria in terms of addressing specific visual, functional, environmental and cumulative impacts (D9c). D10 deals with basement developments.

6.28 D11 relates to safety, security and resilience to emergency. It requires measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. It also identifies the need to work with agencies such as the Metropolitan Police Service (MPS) to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime.

6.29 In the THLP, S.DH1, D.DH2, D.DH6, and D.DH7 deal with delivering high quality design, attractive streets, spaces and public realm, tall buildings and density.

6.30 The NPPF seeks to achieve well-designed places, stating that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (paragraph 131). Paragraph 135 sets out criteria, including ensuring that developments are visually attractive as a result of good architecture, layout and effective landscaping and are sympathetic to local character and history, including the surrounding built environment

and landscape setting, while not preventing or discouraging appropriate innovation or change.

- 6.31 Criterion f also states that “*create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*”
- 6.32 Paragraph 139 of the NPPF is clear that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents.
- 6.33 Paragraph 102 of the NPPF states that decisions should promote public safety and take into account wider security and defense requirements by “*anticipating and addressing possible malicious threats and other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate. .... the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.....*

- 6.34 Other material considerations include the London View Management Framework SPG.<sup>45</sup>

#### *Amenity*

- 6.35 LP Policy D6 sets housing quality and standards including the provision of sufficient daylight and sunlight. Other matters pertaining to amenity, that is privacy, outlook, daylight and sunlight, noise, construction impacts and fire safety, are also covered in LP design policies D3 and D9. D12 and D14 also deal specifically with fire safety and noise. THLP Policy D.DH8 requires the protection of the amenity of future residents and occupants by ensuring adequate levels of daylight and sunlight for new residential developments.
- 6.36 NPPF paragraph 124 seeks to promote effective use of land while ensuring safe and healthy living conditions. Paragraph 130d states that when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 6.37 Other material considerations include the Building Safety Act 2022, BS9991:2024: Fire Safety in the design management and use of residential buildings code of practice and updated guidance was also introduced into the applicable LP policies relating to evacuation lifts.

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<sup>45</sup> CD5.18

### *Transport*

6.38 The LP contains a suite of policies relating to transport. This includes T1 strategic approach to transport, T2 healthy streets, and T3 transport capacity, connectivity and safeguarding. T4 deals with assessing and mitigating transport impacts, and states that development proposals should not increase road dangers. T5 relates to cycling and sets out standards for the provision of appropriate levels of cycle parking. T6 is similar in that it sets standards for car parking, although the emphasis is to limit reliance on the private car, particularly in areas of good public transport. It also requires electric vehicle charging points to be provided. T7 relates to deliveries, servicing and construction and T9 relates to infrastructure funding for transport.

6.39 TBTH policies S.TR1, and D.TR2-4 cover the same broad themes as the LP in respect of sustainable travel.

6.40 Paragraph 116 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. Paragraph 117 sets out a number of criteria which underpin the above, including c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

6.41 Other material considerations include the Transport for London (TFL) Pedestrian Comfort Guidelines for London (2019).<sup>46</sup>

### *Environment*

6.42 Relevant environmental policies in the LP include G1 which covers green infrastructure, G4 for open space and G5 for urban greening which requires measures such as high-quality landscaping which would contribute to an Urban Greening Factor (UGF). G6 requires biodiversity net gains.

6.43 SI1 seeks the delivery of further improvements to air quality. SI2 relates to minimising greenhouse gas emissions, and SI3 concerns energy infrastructure and heat networks.

6.44 In terms of waste SI7 seeks to reduce waste and support the circular economy while SI8 deals with waste capacity and self-sufficiency.

6.45 SI12&13 deal with flood risk and sustainable drainage.

6.46 THLP Policies S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D. OWS3, D.ES10, S.MW1, D.MW3 & D.SG3 all cover similar themes.

### *Other material considerations*

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<sup>46</sup> CD5.32

6.47 There are overarching international legal obligations in terms of the proposed embassy use, as set out in the Vienna Convention on Diplomatic Relations (1961)<sup>47</sup> and the Vienna Convention on Consular Relations (1963).<sup>48</sup> These have been incorporated into domestic law through the Diplomatic Privileges Act (1964)<sup>49</sup> and the Consular Relations Act (1968).<sup>50</sup>

6.48 The 1961 Vienna Convention is a key international treaty that outlines the framework for diplomatic relations between independent countries. It provides a detailed set of rules which govern the privileges and immunities of diplomatic missions, including embassies, to ensure the efficient performance of their functions.

6.49 Article 28 of the 1963 Convention requires that the receiving state shall accord full facilities for the performance of the functions of the consular post. Article 30 also requires (1) that the receiving state shall either facilitate on its territory, in accordance with its laws and regulations, by the sending State of premises necessary for its consular post or assist the latter in obtaining accommodation in some other way; and (2) it shall also, where necessary, assist the consular post in obtaining suitable accommodation for its members.

6.50 Article 22 of the 1961 Convention and Article 31 of the 1963 Convention place a special duty of the State to protect diplomatic premises and consular premises that supersedes local resourcing considerations (if any).

6.51 Paragraph 2 of the NPPF states that planning policies and decisions must also reflect relevant international obligations and statutory requirements.

*Conditions and Obligations*

6.52 Finally, NPPF states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition (paragraph 56).

6.53 Paragraph 57 states that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision-making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.

6.54 Paragraph 58 states that planning obligations must only be sought where they meet all of the following tests: a) necessary to make the

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<sup>47</sup> CD6.04

<sup>48</sup> CD6.05

<sup>49</sup> CD6.01

<sup>50</sup> CD6.02

development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. This reflects regulation 122(2) of the Community Infrastructure Levy Regulations 2010.

6.55 LP Policy DF1 and THLP Policy D.SG5 also relate to securing planning obligations. Finally the LBTH Planning Obligation's SPD is a material consideration.

## **7. AGREED MATTERS**

7.1 The signed SOCG<sup>51</sup> is a comprehensive document between LBTH and the applicant. It sets out general matters such as the application proposals, the application process, the site and surroundings, a detailed planning history, and relevant planning policies.

7.2 In particular, section 9 sets out the agreed aspects of the planning assessment, which is summarised below.

7.3 On the principle of development, it is agreed that the Sui Generis use proposed is supported in principle and that the proposed on-site residential uses are ancillary to the embassy use, and secured by condition for use by embassy staff only.

7.4 In terms of the focus of the SoS, on heritage the SOCG sets out the following matters of agreement:

- 7.4.1 The proposed works to the listed buildings will preserve and enhance these assets, in accordance with s16 of the PLBCAA 1990.
- 7.4.2 The proposed development would preserve the setting and significance of listed buildings in accordance with s66 of the PLBCAA 1990.
- 7.4.3 The proposed development would preserve and enhance the character and appearance of the ToLCA in accordance with s72 of the PLBCAA 1990.
- 7.4.4 The proposed development would conserve and safeguard the OUV of the Tower of London World Heritage Site (TolWHS). There would be no impact on strategic views within the LVMF and views from within the Grade I listed ToL.
- 7.4.5 The archaeology within the site is of equivalent importance to a Schedule Monument (SM). Appropriate mitigation measures would ensure the protection of archaeological assets during construction.
- 7.4.6 The proposals would enable access to the currently inaccessible archaeological assets, allowing meaningful public engagement.
- 7.4.7 The proposed development would comply with relevant LP and THLP policies in respect of archaeology.

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<sup>51</sup> INQ24

7.4.8 Murray House and Dexter House do not merit the status of being non-designated heritage assets.

7.5 In terms of design, it is agreed that:

- 7.5.1 The architectural design, scale, massing and form of the proposals would result in an overall improvement on the current situation of the site.
- 7.5.2 The proposals would meet the requirements of THLP Policy D.DH3 relating to the acceptability of a tall building outside a tall building zone.
- 7.5.3 The proposals would result in improvements to the public realm.

7.6 In terms of public safety and security, there is agreement that such matters have been fully considered and planned within the design proposals in order to sufficiently protect the embassy use. In particular:

- 7.6.1 Broad security measures such as HVM bollards/planters, event management plan, close circuit television (CCTV), and streetlighting would enhance the security around the application site.
- 7.6.2 The applications have been subject to reviews by the MPS and others.
- 7.6.3 The current Chinese Embassy at 49-51 Portland Place does not raise concerns of public safety and security such as to require a permanent police presence and protection.
- 7.6.4 In the event of a threat to the proposed embassy site, the UK government would be under a duty to protect its safety and security as well as to prevent and mitigate risk.
- 7.6.5 With appropriate planning conditions in place, the proposed development would accord with relevant planning policies.

7.7 The following highways and transport matters are the subject of agreement between the parties:

- 7.7.1 The higher levels of car parking provision at the site is due to the unique nature of the proposed embassy use.
- 7.7.2 Cycle parking is compliant with LP policy requirements.
- 7.7.3 The proposed development would result in a reduction of trips when compared with the existing use and against the previous 2017 permission.
- 7.7.4 The forecast daily and peak hour trip generation would not warrant any mitigation on public transport or road networks.
- 7.7.5 Subject to final details being secured by condition, the vehicular and pedestrian access strategy and the delivery and servicing management strategy are agreed.

7.8 In terms of amenity, it is agreed that the proposals would have an acceptable relationship with the surrounding existing built environment by way of height, scale and massing. Specifically:

- 7.8.1 There would be marginal changes in terms of enclosure to neighbouring properties at St Mary Grace's Court would benefit from increased separation distances than the current arrangement.
- 7.8.2 There would be some adverse effects in terms of daylight, sunlight and overshadowing to nearby residential windows between St Mary Grace's Court and the proposed balconies at Royal Mint Gardens, but these impacts are considered to be acceptable in the context of overall retained amenity.
- 7.8.3 Impacts during construction will be subject to a condition to protect amenity of neighbouring residents.

7.9 Other topics of agreement in terms of fire safety, energy, carbon, air quality, biodiversity, flood risk etc, are also covered in the SOCG.

7.10 The proposed benefits which would enhance the economic and environmental well-being of the area are agreed in section 10. These include:

- 7.10.1 Making the most effective use of a large, vacant, highly accessible site;
- 7.10.2 Delivering significant sustainability benefits including the reuse of existing buildings;
- 7.10.3 Preserving and enhancing nationally significant heritage assets and their settings;
- 7.10.4 Enhancing the character and appearance of the area;
- 7.10.5 Generating employment and spin-off benefits to the wider area;
- 7.10.6 Enhancing the public realm;
- 7.10.7 Enhancing urban greening and biodiversity.

7.11 Overall, subject to conditions and obligations, it is agreed that the planning balance weighs in favour of the proposed development and works, taking account of the development plan, NPPF and other material considerations.

## **8. THE CASE FOR CHINESE EMBASSY IN THE UK<sup>52</sup>**

### ***Introduction***

8.1 There are two applications to be considered. These submissions focus on the planning application as this has attracted public objection. The listed building consent application is entirely uncontroversial.

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<sup>52</sup> Based on INQ28 and INQ29

- 8.2 The Inquiry has heard entirely credible evidence from LBTH and the MPS to explain why they no longer object to the proposed new embassy. LBTH considers that the planning balance stands in favour granting permission including that the proposals accord with the development plan when read as a whole.
- 8.3 The various allegations that LBTH and the MPS have changed their positions because of pressure from the Government, 'backroom deals' or other improper behaviour or 'other forces at play' are entirely unfounded and should never have been made.

### ***Design, Townscape and Heritage***

- 8.4 The layout and design of the scheme evolved during lengthy pre-application discussions with all relevant stakeholders. The latest fire safety requirements have also been incorporated.
- 8.5 The end result is a scheme of high quality design which would cause no harm in townscape and visual terms but instead would be beneficial. There would be significant improvements when compared to the existing situation.
- 8.6 In terms of above-ground heritage, there would be no harm at all to the heritage significance of any heritage asset, and there would be heritage benefits to which great weight should be given.
- 8.7 In terms of below-ground heritage, the scheme would bring substantial public benefits, which would outweigh any *potential* for harm, which if it occurred would be "very low level" less than substantial harm. The archaeology witness has carried out what is often described as an internal heritage balance, where the potential for harm *to the archaeological interest* has been looked at and weighed that against the substantial benefits *to the archaeological interest*. Any less than substantial harm is not a point which in any way reduces the case for granting consent. Indeed, one of the very real tangible benefits of these proposals concerns the HIC including the ability of the public to be able to view parts of the abbey ruins, and this should be treated as a strength of the scheme.

### ***Public Safety***

- 8.8 Based on the conclusions of the Crilly Report,<sup>53</sup> local residents who live near the site fear that the embassy would become a target for terrorist attacks, and are scared that their lives and their homes would be put in peril.
- 8.9 The objections are largely founded on the identity of the nation (China) whose embassy it would be, rather than the use itself. The objection of the RMCRA is somewhat unclear and implausible as they confirmed at the

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<sup>53</sup> This is the security report undertaken for RMCRA at CD10.01 and CD10.02

Inquiry that they “*are not adverse to the Chinese Embassy per se. It’s the embassy use.*”

- 8.10 However, no case has been made that the site is unsuitable as a matter of principle for an embassy. The site falls within the CAZ whereas a matter of development plan policies embassies are acceptable in principle.
- 8.11 The argument is that the site is unsuitable for the *Chinese Embassy* gives rise to very real difficulties. It is impossible to see how it would be legitimate in terms of planning law and national and development plan policies, and with the Vienna Convention, to conclude that although the site is suitable for an embassy use, it isn’t suitable for use for the *Chinese Embassy*.
- 8.12 A good analogy would be for an office use and the notion that while a site might be suitable for offices, it wouldn’t be suitable for offices to be occupied by an oil company because they might attract large disruptive protests. One cannot discriminate against a use on the basis of the anticipated user. Otherwise there could be an untenable position where, for example the Irish Embassy would be acceptable but not the Chinese Embassy.
- 8.13 Planning law and national and development plan policies, and for its signatories, the Vienna Convention which is founded on reciprocity, are nation-neutral. It is not possible to discriminate against a use on the basis of the anticipated *user*. Otherwise that could give rise to an untenable situation of the embassy of one nation being permitted but another nations embassy being refused.
- 8.14 In terms of fear of crime as a legitimate planning consideration, paragraph 96 of the NPPF is concerned with the design of a proposed development so as to make it safe and accessible, and not with whether a use can be refused permission because of the fear of crime.
- 8.15 NPPF paragraph 102(a) requires “*appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.*” [emphasis added] Again, this aims to ensure that steps are taken in terms of layout and design. The paragraph also refers to locations “*where large numbers of people are expected to congregate*” and the footnote gives a wide range of examples such as cinemas, sports stadia, arenas, but also transport hubs, shopping centres, and hotels and restaurants. The NPPF does not suggest that a use should be refused permission because of fear and anxiety about crime or malicious threats.
- 8.16 Considering matters more broadly, it is relevant to consider the extent to which local residents’ fears and anxieties are objectively justifiable on the evidence available.

- 8.17 There is no evidence to substantiate the argument that an embassy use in London is likely to attract terrorist attacks. There is certainly no evidence to suggest that local people are more at risk from having an embassy near them than other uses.
- 8.18 In terms of the proposals being for a Chinese Embassy – it is the same position. The current Chinese Embassy in Portland Place has been the PRC's Embassy for decades; there have been no terrorist attacks. People live near it, children go to school close to it, it is in an area close to other embassies and consular premises, medical facilities, hotels, the RIBA, and the BBC.
- 8.19 It is not possible to say that embassies in general or the embassy for any specific nation could never be a target, but the same could be said for any use, and certainly for any place where large numbers of people gather or are passing through. There have been acts of terror on bridges across the Thames, on the tube, on a bus, and in Manchester at an arena hosting a pop star. Sadly, the list goes on. But that does not mean that planning permission should be refused because one can never categorically rule anything out.
- 8.20 Thus, while fear and anxiety might be understandable, the evidence does not substantiate the fears and anxieties in question as being reasonable.
- 8.21 The evidence of the security witness concentrated on 'threat' rather than 'risk' because without a threat, there is no risk. For there to be a threat there needs to be a person or people with the capability to carry out an act of terrorism, and the intent to do so.
- 8.22 The Crilly report speaks explicitly about threat. If there was a tenable threat to an embassy from terrorism, one would then consider how vulnerable the design of the site is, and what the consequences of an attack would be. Any new build embassy would need to consider how best to design it in detail to reduce vulnerability. The consequences of an attack would be similar or the same for any members of the public unfortunate to be caught up in it - whether passers-by or local residents or people working locally.
- 8.23 There is no evidence to support the assertion that there is a terrorist threat to the Chinese Embassy. The current embassy has no police presence at all, and simply two private security operatives at the entrance from the street. There have been no terrorist attacks. On the Global Terrorism Index China is ranked 73<sup>rd</sup> (the ranking goes to 89) whereas the UK is 41<sup>st</sup>. Any threat of a bombing at the site – which is what the Crilly report majors on – is considered to be remote.
- 8.24 Most tellingly, the Counter Terrorism Security Advisor (CTSA) for the MPS does not object nor have they objected at any time to the proposals. If there was a legitimate concern it would be expected that CTSA would raise it.

- 8.25 Putting the fear of terrorism into context, in the wider local area there are some 75 reported offences involving violence and sexual offences a month. If anything, having an embassy here is likely to reduce criminal activity.
- 8.26 While it is stated that the local residents' security concerns are fundamental and are their biggest concern, this is of insufficient substance and weight to block the proposed embassy.

### **Protests**

- 8.27 People are entitled to protest, and protest they do; the MPS stated at the Inquiry that they brought into central command some 3,000 large-scale protests (i.e. protests which can't simply be policed locally). These have included protests concerning Palestine and Gaza.
- 8.28 Embassies can, and do, attract protests. Many other places do as well for example, oil companies and banks. Parliament Square, Trafalgar Square, the main thoroughfares of London, the Royal Courts of Justice and numerous other examples of other places across London regularly see protests.
- 8.29 At the Inquiry there were references made to the protest which took place outside Royal Mint Court on 8<sup>th</sup> February and the intention to organise more protests like this unless the MPS reinstate their previous objection to the proposed embassy. There is simply no basis in planning policy for refusing permission for a use on the basis that it would be likely to attract protesters and such bullying tactics should not be taken into account.
- 8.30 Anything and any building can attract or be the scene of protests. If concerns about protests are allowed to play a role in planning decisions, it would have a corrosive and stultifying effect.
- 8.31 It is also not appropriate to make decisions about uses on the basis that there is not much room on the street to accommodate lots of protesters.
- 8.32 It was put at the Inquiry by the Inter-Parliamentary Alliance on China (IPAC) that Portland Place is not a safe place for an embassy and that it is not possible to protest there without blocking the road. It is correct that you could not get many people milling around and protesting outside the current embassy without them encroaching on the road. But that does not and simply cannot mean that Portland Place, which apart from the current Chinese Embassy is also home to two other Embassies (Poland, and Kenya), two consulates (Columbia, and Portugal) and an official residence (Sweden), is an unsuitable place in planning terms for embassies and other diplomatic premises.
- 8.33 In similar vein, a location like Royal Mint Court, where there is much more space to accommodate protesters outside an embassy than there is in Portland Place, cannot conceivably be said to be an unsuitable place for an embassy, or specifically for the new Chinese Embassy.

8.34 The argument in terms of the proposed location of the embassy appears to be twofold. First, that the applicant's Pedestrian Comfort Level Assessment (PCLA) which shows that large numbers of protesters can be accommodated outside Royal Mint Court without having to obstruct the roads is incorrect. Second, that the proposed embassy would attract large/very large numbers of protesters. The basis of this argument is that on 8<sup>th</sup> February a protest was attended by around 3,000 people<sup>54</sup> who didn't all keep to the pavements and instead spilled out into the road.

8.35 One of the concerns of the RMCRA is that Cartwright Street would be affected by protests. The protests on 8<sup>th</sup> February were designed to put pressure on the MPS to change their position back to one of objection to the proposals. However, protestors who attended congregated outside the main entrance to the site, and didn't go round the back, out of sight of the main entrance, and people visiting the Tower of London, to protest in Cartwright Street. At the Inquiry the MPS stated that people protest in the most obviously public way and that they would not protest around the back. Therefore, one thing we can take from the 8<sup>th</sup> February protests is that it's highly unlikely that protests would take place at the back of the embassy site and even if they did, they would be safely policed by the MPS.

8.36 The submitted PCLA<sup>55</sup> do not predict human behaviour but simply demonstrate how many people could be accommodated on the pavement, off the roads, at various densities of people per square metre at various different sizes of areas of pavement.

8.37 In the most extensive area which would have protesters outside the front of the site and all the way along East Smithfield and Mansell Street anything up to well over 4,000 people could be accommodated. In the smallest area originally looked at which is at the front of the site and a bit off to each side of it, up to over 1,700 people could be accommodated. Up to 200 people could be accommodated in very small areas at the front of the site.<sup>56</sup>

8.38 In other words, large numbers of protesters could gather outside the site and protest *without having to* be in the road obstructing traffic. The assessments carried out have been validated and accepted by TfL and LBTH and are simply the application of densities of people to different size areas.

8.39 There is no evidence to demonstrate any flaws in the work carried out. This work has also been independently reviewed and accepted by the LBTH consultants.<sup>57</sup> The MPS also did not challenge any of the figures.

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<sup>54</sup> Based on MPS estimates.

<sup>55</sup> CD1.33 and updated at section 6.3 of CD11.07 – Nina Quarshie POE

<sup>56</sup> *Ibid* figures 14-19 p34-40

<sup>57</sup> CD9.08, appendix 3

8.40 This demonstrates that if the MPS decided to police protests at the site by keeping people on the pavement, most obviously by putting up barriers at kerbside to keep people off the road, then even a very large protest of over 4,000 people could be accommodated in this way.

8.41 It is also not for the applicant to play any role in maintaining order and safety during a protest – that is the job of the MPS, as per the special duty under Article 22 of the Vienna Convention.

8.42 The MPS explained to the inquiry that protesters would wish to congregate at and near the main entrance to the site, and that equipped with a tape measure an inspection of the area in question had been carried out, and in an area measured at some 272 square metres, at a density of 2 people per square metre, the MPS consider that over 500 people [ $2 \times 272 = 544$ ] could be safely accommodated at the front of the site and off the road. 500 people has been taken by the MPS as an upper level of the number of protesters who have congregated outside the current Chinese Embassy. The MPS also explained that most of these protests over the last couple of years had seen up to 200 attendees, less than 10 had more than 200 but less than 500. None had over 500. This information is also confirmed by the MPS in their 10<sup>th</sup> February letter.<sup>58</sup>

8.43 Our witness on transport subsequently drew up the area referred to by the MPS to give an idea of what such an area looks like.<sup>59</sup> If more people attended, the protest pen would need to be made a bit bigger to keep protestors off the roads.

8.44 It is noted that a similar exercise has been done by an IP, Mr Au,<sup>60</sup> which shows that some 520 – 850 people could be accommodated outside the front of the site, off the roads.

8.45 The protest which took place on 8<sup>th</sup> February is not representative of protests at the current Chinese Embassy. It was very much the outlier. The 3,000 who attended didn't stick to the pavements and took up road space. However, the protest was arranged with the sole purpose of causing disruption so as to pressurise the police into objecting to the proposals, as was confirmed by IPAC at the Inquiry. The MPS were clear in their stance and called it a 'protest about protests' at the Inquiry. Self-fulfilling prophecies from objectors to the proposals should not be accepted.

8.46 The key point however is that even if the events of 8<sup>th</sup> February are taken at face value, they show two things. First it shows that the police had policed the protest safely and would do so in the future as well. The MPS confirmed that they would have the resources, would facilitate peaceful protests and would be able to police protests to make them safe. As

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<sup>58</sup> CD12.186

<sup>59</sup> INQ25

<sup>60</sup> CD12.214 p4 & 6 in particular

explained to the Inquiry, the MPS are very experienced in policing protests safely.

8.47 The MPS also confirmed again at the Inquiry that they do not object to the proposals. It was explained that their letter dated 14<sup>th</sup> November 2024<sup>61</sup> to LBTH which expressed some concerns was a high level view and not a detailed submission and that there had not been a visit to the site prior to writing the letter. Subsequently, they had been sent the PCLA by LBTH, visited the site and considered the matter in detail, revising their position.

8.48 Second, as set out in the MPS letter dated 10 February<sup>62</sup> TfL has advised that from the protest, there was a 'serious' impact. This is defined as where "*traffic has been stopped for less than 5 minutes but in excess of the red signal time displayed on the traffic signals operation on the road.*"

8.49 It is not accepted that the impact of occasional protests at a site on traffic flow could ever constitute a 'severe impact' in terms of paragraph 116 of the NPPF. This would need to be something regular and frequent, but in any event the sort of impact as described by TfL with regards the 8<sup>th</sup> February protests simply cannot be characterised as 'severe' and nor are they by TfL (or by LBTH as local highway authority).

8.50 As stated by the MPS, there are regularly very large protests against the Government in Parliament Square, and against other governments. Examples of protest activities outside the High Commission of India, the US Embassy, the Iranian Embassy, the Pakistan Embassy and that of Miramar were given.

8.51 Most embassies are in the West End. There is no embassy anywhere in London where 4,000 or more people could protest directly outside the embassy in question without spilling onto the road.

8.52 This goes full circle back to the point that the potential for protests to block the grant of planning permission for an embassy use should not be allowed.

8.53 The arguments that protests outside Royal Mint Court would in some way affect the heritage value of the ToLWHS, and/or of the application site, do not make sense. Protests are part of life in London and simply cannot undermine the intrinsic heritage value of buildings and areas. Parliament Square, with the WHS of Parliament and Westminster Abbey, are not of any less heritage value because it is regularly the scene of protests. The same goes for the ToLWHS, and Tower Bridge, both of which have seen very large and very disruptive protests over recent years, which are unrelated to the current application proposals. These assets plainly retain all of their heritage significance, unimpaired.

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<sup>61</sup> CD4.27

<sup>62</sup> CD12.186 p3

### ***Highway Safety***

8.54 There are no highway safety issues arising from protests. Protests of several hundred people can readily be accommodated outside the front of the site and off the road. Very large protests – if they were to occur - can and would be policed safely by the MPS. There were no issues concerning the safety of protesters or road users or others in the area at the protests on the 8<sup>th</sup> February.

8.55 In terms of traffic issues more generally, vehicular trips to and from the embassy would be at very low numbers while there are very high traffic flows on the roads near the site. There is no basis at all for asserting that there would be a severe impact, which is the test in paragraph 116 of the NPPF. The access and servicing proposals are safe. TfL and LBTH as local highway authority have no objections.

### ***Residential Amenity***

8.56 The effects of the proposals on local residential amenity are set out in detail by the Scheme Architects POE.<sup>63</sup> There is nothing unusual or different in terms of effects here in comparison with any other similar location, or what is found in the local area currently.

### ***Foreign Commonwealth and Development Office & Home Office Representations***

8.57 It is understood that the written representations from the Foreign Commonwealth and Development Office (FCDO) & Home Office (HO)<sup>64</sup> assume that the paved forecourt off East Smithfield in front of the Cultural Exchange building and HIC (described as the pavilion in their letter) would form part of the inviolable premises of the embassy, and should there be an incident in either area the police and emergency services would require permission to enter and attend. Because of this the FCDO/HO contend that there should be a hard perimeter (some form of security fence) along the boundary with the public highway.

8.58 The applicant wishes to have the best of relations with the FCDO/HO.

8.59 However, in planning terms there are very straightforward ways of responding to the FCDO and the HO points without there being a need for a security fence at the boundary with the public highway. If the concern is about people being able to access the HIC without going through a security screen that is easy to deal with as people can be screened within the building as they enter.<sup>65</sup> As to the concern about the police and emergency services needing permission to access the paved forecourt

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<sup>63</sup> CD11.03 Section 8 p110-119

<sup>64</sup> CD12.02

<sup>65</sup> See INQ11 p70 for a diagram

and the HIC that is readily overcome by the embassy simply giving permanent permission for this to happen.

8.60 The applicant wishes to state on record that:

*"The matter of public access areas can be addressed by way of a condition in the recommendation for granting the planning permission. The concern can be addressed through measures based on further discussion between the relevant parties."*

8.61 The report to the SoS will have to tackle the question of conditions whatever the recommendation made by the Inspector as the decision will be made by the SoS.

#### ***Planning Conditions/s106 Planning Obligation and the Vienna Convention***

8.62 In terms of the implications of international legal obligations on the issue of planning obligations, paragraph 2 of the NPPF explains that *"planning.... decisions must also reflect international obligations.."*

8.63 The position is summarised in recital (C) of the s106 planning obligation<sup>66</sup> which states:

*"The owner [the PRC] is entitled under the applicable treaties between the UK and China, including the Vienna Convention of Diplomatic Relations to choose to adopt UK standards or other equivalent standards (including Chinese standards) for internal areas within the Site exempt from inspection or verification, detailed design and construction and may follow Chinese codes and standards."*

8.64 It is the case that international obligations cannot be relied upon by the PRC as a reason for failing to apply for planning and listed building consents for the proposals.

8.65 The relevance of international obligations comes into play with regards the construction and operation of the embassy which are the subject of the position set out in recital (c) of the s106 planning obligation. This needs to be considered with regards to the content of planning obligations and conditions as the PRC would be able, under international reciprocal obligations, to adopt its own codes and standards in the detailed design and construction of internal areas, those being exempt from verification.

#### ***Accordance with the development plan, planning balance and public benefits***

8.66 The position with regards accordance with the development plan is straightforward.

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<sup>66</sup> INQ29

8.67 In terms of locational policies there is complete accordance as the site is within the CAZ and embassies are one of the strategic functions which are appropriate within it. The site is also within the City Fringe Opportunity Area. LP policy SD4 (a) and SD4 (g) and paragraph 2.4.4b; as well as THLP policy S.EMP1. All development management policies are complied with. All this leads to the overall conclusion that in terms of s.38(6) of the Planning & Compulsory Purchase Act 2004 the determination which would be in accordance with the development plan would be to grant planning permission.

8.68 In these circumstances, the question arises whether material considerations indicate otherwise. The primary material consideration is of course the NPPF. Paragraph 11c) explains that where there is accordance with the development plan, permission should be granted 'without delay.'

8.69 The most recent revision of the NPPF introduces a brownfield presumption, see paragraph 125c) by virtue of which permission is to be granted "*unless substantial harm would be caused.*" There is no trace of substantial harm in this case. All other relevant parts of the NPPF are complied with as well. In short, there are no material considerations which indicate that permission should be refused.

8.70 Instead, there are material considerations by way of the wider public benefits which these proposals would bring which add weight to the case for approval, that is they give additional weight to allowing the embassy to proceed.

8.71 The benefits relate to making the most effective use of a large vacant brownfield accessible site; public realm; heritage enhancements; enhancing the character and appearance of the area; archaeology, and economic and diplomatic matters.

### ***Overall Conclusion***

8.72 In applying the law, development plan and national planning policies to the evidence, there is no basis for a recommendation that the proposed embassy should be refused permission. It is overwhelmingly the case that planning permission should be granted.

8.73 Accordingly, it is the position of the applicant that the recommendation by the Inspector and the SoS decision should be to grant these applications.

## **9. THE CASE FOR LONDON BOROUGH OF TOWER HAMLETS<sup>67</sup>**

### ***Introduction***

9.1 This is an Inquiry into two Applications which have been called in by the SoS for her own determination under s77 of the Town and Country Planning Act 1990, and s12 of the PLBCAA 1990. The power of call-in is

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<sup>67</sup> Based on LBTH opening and closing submissions at INQ2 and INQ27

used sparingly by the Minister and, in this case, even more unusually, the Applications were called in before the LBTH as the Local Planning Authority (LPA) had formally considered them.

- 9.2 The SoS has, therefore, signalled that this is a case of unusual significance; by her action, she demonstrates that she considers it to be of wider than local importance, which it manifestly is. Not only is the purpose of the proposal the housing of the diplomatic mission of a foreign state, but both the application site and its surroundings are marked by national and international heritage designations.
- 9.3 That does not mean that the local view is unimportant in this case and LBTH, although it will not determine these Applications, remains the LPA and the Local Highway Authority. In recognition of the continuing importance of the LPA, the legislation for call-ins provides for it to be a statutory party and requires the SoS to take the LPA's representations into account in her determinations.
- 9.4 Although this has been an unusual Inquiry, the framework for decision making is, like every other planning determination, set by legislation and policy. The LPA has to operate within that framework and this is what LBTH have done in this case.

### ***The Position of LBTH***

- 9.5 When LBTH considered the Applications at its SDC on 9<sup>th</sup> December 2024, Members resolved that, had they been able to determine the Applications, they would have refused permission for both Applications. This was not a decision or determination on the applications, since the applications had already been called in for determination by the SoS. Rather, this resolution concerned the position the Council would take at the Inquiry.
- 9.6 The Officer Report<sup>68</sup> was a detailed, reasoned document which considered and summarised all relevant elements of the applications, reported consultation responses and assessed the applications against the policies of the development plan, supplementary guidance documents and national policy and guidance. In response to questions from Members, Members were advised by officers of the responsibilities of host nations in respect of protecting diplomatic missions and embassies. The recommendation was to resolve that the determination would have been to grant both Applications.
- 9.7 Various people spoke at the Committee Meeting including, importantly, representatives of the MPS. Those representatives explained their opposition to the proposals and reasons for that position. In essence, their concerns related to the management implications of potential protests occurring outside the embassy and, specifically, the impacts upon other users of the highway, including pavements, as well as the other public areas in the vicinity.
- 9.8 The resolution of the SDC followed and was much influenced by representations made by representatives of the MPS at the SDC. Given

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<sup>68</sup> CD9.04

the role and expertise of the MPS, it was reasonable to pay careful attention and give weight to what they were saying.

9.9 Delegated authority was given to officers to agree the precise wording of the putative reasons for refusal. Although members indicated at the meeting that they would have been minded to refuse the listed building application as well as the planning application, it was subsequently agreed by officers in consultation with the Committee Chair, not to pursue that position, since the proposed works, the subject of that application, were not objectionable.

9.10 Following the SDC meeting, officers drafted the putative reason for refusal (PRfR) in consultation with the Chair, in the following terms:

*"The proposed embassy use in this location would be likely to result in protest activity around the site which could not be adequately accommodated by the surrounding public realm. This would put pedestrians at risk, cause disruption to the local community, and result in people overspilling onto the adjacent roads, compromising safety and security. Given the already congested nature of the surrounding area, and presence of key arterial roads, this disruption would cause severe harm to the surrounding highway network. This is contrary to Tower Hamlets Local Plan 2031 (2020) including Policies S.TR1, D.TR2, D.DH2 and S.DH5, and to the London Plan (2021) including Policies SD4, E10, HC2, T1, T2, T4, GG6 and D11, as well as to the National Planning Policy Framework (2024) paras 102 and 116 in particular."*

9.11 The first SoC<sup>69</sup> of LBTH, dated 13<sup>th</sup> December 2024, reflected this PRfR and LBTH anticipated calling officers of the MPS as expert witnesses in support of it.

9.12 It was only after the first CMC on 19<sup>th</sup> December 2024 that LBTH were informed that the MPS were not prepared to provide evidence to the Inquiry in support of the PRfR. The MPS concerns at the SDC had been predicated on their own, very different, projection of the holding capacity of the area around the site in the event of there being protests (or other gatherings) focussed on the proposed embassy. Therefore, the fact that, in changing their view, the MPS cited the applicant's work on this point (the PCLA), which they had not previously seen, was highly significant.

9.13 The revised stance of the MPS and their disinclination to give evidence placed LBTH in a radically changed position with regard to its position at the Inquiry. Clearly, an LPA, whose representations are statutory material considerations, must exercise due care in relation to its case and support it by appropriate evidence.

9.14 Neither LBTH as local Highways Authority nor TfL as strategic Highway Authority had objected to the Applications so, faced with this situation, the officers sought external expert review from i-Transport.<sup>70</sup> They concluded that:

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<sup>69</sup> CD9.06

<sup>70</sup> CD9.08 Appendix 3

*"... it is likely that the Metropolitan Police powers, extent of likely protest activity, capacity of the surrounding public realm and proposed management plan will be [sic] mean that protest activity around the site can be adequately accommodated without putting pedestrians at risk or causing disruption to adjacent roads or severe harm to the surrounding highway network."*

- 9.15 In the light of the MPS changed position and the external transport advice, which mirrored that of the statutory highways authorities, it would have been irresponsible to seek to pursue the putative reason for refusal.
- 9.16 Accordingly, LBTH informed the Planning Inspectorate, the applicant and the then Rule 6 Party of the new position. LBTH submitted a revised SoC<sup>71</sup> on 12<sup>th</sup> January 2025. The PRfR remains part of the history of this case, as has been made clear throughout, but LBTHs position has had to change, in response to the change of stance of the MPS.
- 9.17 Criticism has been levelled at the LBTH by some for the approach which it has taken and private individuals are free to hold and express their own opinions. Part of the planning framework is that statutory parties at a planning inquiry, such as the LPA, are required to justify their position by evidence from witnesses; they cannot simply take up a stance and assert it.

### ***The Development Plan and Other Material Considerations***

- 9.18 On analysis of the applications against the relevant policies of the LP and the THLP, as well as national policy and strategic and local guidance, overall the applications comply with the development plan and that there would be benefits to heritage assets, designated and undesignated.
- 9.19 The statutory and policy presumptions in favour of the Planning Application are therefore engaged and the heritage benefits attract considerable importance and weight in the planning balance. On the basis of his lengthy professional experience in the public and private sectors, the expert planning witness who appeared on behalf of LBTH he concluded that Officers had handled this complex case in an exemplary and professional fashion, notwithstanding that the MPS' late change of stance had placed LBTH in a very difficult position.
- 9.20 For the sake of completeness, short legal submissions on the relevance of the Vienna Convention on Diplomatic Relations to the determinations are set out below.
- 9.21 It is a long-established principle of planning law that:  
*'In principle...any consideration which relates to the use and development of land is capable of being a planning consideration. Whether a particular consideration falling within that broad class is material in any given case will depend on the circumstances.'*<sup>72</sup>

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<sup>71</sup> CD9.07

<sup>72</sup> *Stringer v Minister of Housing and Local Government* [1971] 1AER 65

9.22 Clearly some parts of the Convention do not relate to the use and development of land, but the articles of it which relate to the establishment, operation and security of diplomatic premises, in principle, do. Specifically, in relation to the MPS, they are obliged to ensure the protection of the embassy while simultaneously giving effect to the public right to engage in peaceful protest. That is a material part of the factual matrix in this case, to which the MPS and LBTH have had regard.

### ***Conditions***

9.23 It is clearly very important that the best possible management is secured in order to integrate the proposed embassy into its environment, specifically the very significant areas of public realm in which it sits, as well as securing public access to the proposed facilities for viewing the medieval heritage asset lying under the site.

9.24 Such important matters need to be addressed and provided for via conditions and s106 agreement and LBTH were a key participant in the session of the Inquiry dealing with these.

9.25 In terms of the need to secure access to the proposed facilities for viewing the medieval heritage lying under the site. LBTH have proposed a condition which secures this access. The ability to view and have sight of the Cistercian abbey ruins is a clear benefit of the scheme and the extent to which there is free, unimpeded access is relevant to deciding how much weight to accord it. The applicant also acknowledged the importance of such access in the planning balance.

9.26 A further condition of particular importance to LBTH relates to the Events Management Plan (EMP). An EMP is required to enable control and management of events both inside and outside the embassy. For the avoidance of any doubt, LBTH does not suggest that the draft EMP condition means or should mean that the PRC should manage external events and protests. The draft condition reflects the evidence of the applicant's expert transport witness<sup>73</sup> as to the role of the EMP and it is required in order to ensure that, amongst other things, the MPS and TfL can plan the management of potential protests in the best informed and most joined up way possible.

### ***FCDO/HO Proposals***

9.27 As explained in evidence, LBTH are opposed to the alterations to the applications suggested by the FCDO and the HO. Part of the reason for locating the HIC in its proposed location is to enable the public to access it. Similarly, one of the benefits of the scheme is the additional public realm in the form of the new Cultural Exchange Square to which there will be universal access.

9.28 The erection of a physical barrier between the public highway and the Cultural Exchange Square would be a material change to the application that would require further consultation. It is also a change that is likely to require separate planning permission. LBTH considers that any barrier in

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<sup>73</sup> CD11.07 paragraph 6.4.14

this location would materially impact on the nature of the application and adversely impact the planning balance in relation to heritage impacts.

### **Conclusion**

9.29 The LBTH team has endeavoured to assist the Inquiry through the evidence of our expert planning witness and through engagement with the drafting of necessary conditions and s.106 obligations. LBTHs position has changed during the lifetime of the applications for reasons which have been explained and will be reported to the SoS. If the Inspector is minded to recommend approval and the SoS to grant permission and consent, we request that any approval be subject to the conditions and s.106 obligations which LBTH has sought.

## **10. THE CASES FOR INTERESTED PARTIES APPEARING AT THE INQUIRY**

10.1 This section sets out the cases for those IPs who attended the Inquiry. It is split into those who are in objection, and those who are in support of the applications. Full transcripts of all the speakers are listed as Inquiry Documents.<sup>74</sup>

### **Objectors to the proposals**

10.2 The first four cases set out below are based upon detailed submissions which were given on behalf of specific objector groups. Thus, while they appeared as IPs, rather than a main party in a Rule 6 capacity, their cases are recounted below in similar form to the cases of the main parties, to reflect the extent of their submissions.

#### ***Royal Mint Court Residents Association<sup>75</sup>***

##### *Introduction*

10.3 The RMCRA represents the families and businesses that reside and operate from the 100 leasehold properties built at Royal Mint Court in 1987.<sup>76</sup> These were designed to help working people in key worker roles in London to get onto the housing ladder. Originally the freehold title vested in the Crown, until a series of sales resulted in the PRC becoming the residents 'Landlord.' Objecting to these applications has not, therefore, been an easy process due to the concerns that members have about how their landlord will react should permission be refused or even granted.

10.4 The estate that RMCRA is concerned with is at Royal Mint Street, East Smithfield and St Mary Grace's Court, Cartwright Street includes a children's nursery (within Cartwright Plaza) and hair salon. The estate stands on land that forms part of the freeholding upon which the proposed development is to come forward if permission is granted.

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<sup>74</sup> INQ3-9 & INQ15-23

<sup>75</sup> INQ3 and INQ3a

<sup>76</sup> Also known as St Mary Grace's Court

- 10.5 RMCRA's mission is to make sure that its members' homes, businesses and communal areas are safe, law abiding and pleasant places for people to live, work and visit. Ultimately it wants to ensure that its members' homes and neighbourhood becomes a better place for current and future generations. The proposal before the Inquiry appears to the RMCRA to be contrary to that mission and this is why the RMCRA has become involved in these proceedings.
- 10.6 Until January 2025, the RMCRA acted in this Inquiry as a Rule 6 Party, having to withdraw from that status due to the health of its Chair. The basis for those objections are set out within the former Rule 6 Party's SoC, and are maintained by the RMCRA as an IP and addressed in this statement.
- 10.7 RMCRA are hugely concerned and disappointed by the stance taken by LBTH, MPS and Central Government in respect of these applications. LBTH appears to be wholly ignoring the evidence set out in the report prepared on behalf of RMCRA by Crilly Consulting Ltd that is, of course, already before the Inquiry.
- 10.8 On Friday 7 February 2025, RMCRA were alerted to the fact that a proposed demonstration was to take place outside Royal Mint Court on Saturday 8 February 2025, between 13:00-16:00 and connected to the "*potential siting of the Chinese Embassy in the Royal Mint building.*" Clearly from the protest that took place on 8 February 2024, the LPA, MPS and applicant are wrong in their positions. The MPS position is unrealistic and not evaluated through the lens of a recent, and real life, experience.
- 10.9 It is clear that there has been a political pre-determination of these applications at some of the highest levels of Central Government. RMCRA has concerns that Central Government (through the HO and FCDO) has sought to influence the approach to these applications by those who formerly objected to them, but have now performed a volte-face. This is particularly in respect of the MPS, who originally objected to the Applications during the SDC Committee meeting and subsequently provided an unambiguous objection on 14 November 2024, authored by an extremely senior officer.
- 10.10 Further, it is clear from the nature and content of the application made by the applicant during the last CMC, seeking to switch from an Inquiry to written representations, that the applicant considers it a certainty that consent for its proposals will be granted.
- 10.11 RMCRA is continuing to investigate its concerns relating to the pre-determination of these Applications, and it may well be that these will form the basis for a challenge in a different, more appropriate forum if consent is granted.
- 10.12 The term NIMBY is being used with increasingly more frequency these days by the media and members of the Government to describe those who object to planning proposals. It is an unhelpful and derogatory term. RMCRA does not consider itself to be a NIMBY – indeed it has supported previous planning proposals for the site – particularly one to convert it into

a mixed-use development. The objections made in respect of these applications are based on solid grounds. This is not NIMBYISM, but is about being able to object to a wholly inappropriate development that poses considerable security and safety risks to citizens living, working and visiting in close proximity to the proposed embassy.

#### *Security Concerns*

- 10.13 Fundamentally, RMCRA's biggest concern is the security of their estate, should an embassy (especially the applicant's proposed embassy) come forward on the site. RMCRA commissioned Crilly Consulting Limited to produce a report ("the Crilly Report").
- 10.14 RMCRA's key concerns that are set out in the Crilly Report are:
  - a. The very high threat of potential terrorist and activism attacks to the site, and the fact that the estate would be located within a "collateral damage zone" within the area of the proposed embassy in which it is most vulnerable to attack.
  - b. The many vulnerabilities around the site where breaches of security could occur.
  - c. The lack of adequate and sufficient security measures and mitigations contained within the development proposals to afford protection to the site and estate.
  - d. The vulnerable and unsatisfactory fire strategy adopted by the applicant to support the development proposals
- 10.15 This is all contrary to Policies D11, SD6 and objective GG6 of the LP and D.DH2 of the THLP. Serious safety and security risks to the public (including local residents and tourists) arise in respect of the proposed embassy.
- 10.16 The applicant's own security expert has provided a proof of evidence. Having seen this evidence, it provides no reassurance to RMCRA. The witness fails to address or comment on the security design vulnerabilities highlighted in the Crilly Report instead they seek to denigrate it.<sup>77</sup>
- 10.17 Crilly Consulting Ltd has considered what has been said.<sup>78</sup> The expertise of the applicant's witness is on policing, rather than security (and in particular it is limited in respect of security design and bomb blast engineering).
- 10.18 RMCRA's position is that the authors of the Crilly Report and their expertise is to be preferred over the applicant's expert, however it will be for the Inspector and SoS to assess the evidence and form a view on whether the concerns raised by RMCRA can safely be addressed if permission is granted.
- 10.19 RMCRA considers that the applicant's overall conclusion<sup>79</sup> is baseless, and fails to show that the residents of St Mary Grace's Court will not be put at

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<sup>77</sup> CD11.06 paragraph 33

<sup>78</sup> CD10.01 and CD10.02

<sup>79</sup> CD11.06 paragraph 182

risk and adversely impacted by the siting of the proposed embassy at this location.

- 10.20 The RMCRA is clear that all embassies will inevitably attract mass demonstrations at some point. Given the mass demonstration on the 8 of February 2025, RMCRA considers that the inevitability for large scale protests at the proposed embassy at the site is already proven. Members of the RMCRA live in the residential area on Cartwright Street, which will clearly be (and has been) impacted by any protest at the site. The police failed to contain the protestors in the designated protest areas, roads were blocked, and the considerable police presence confirmed the residents' fears for their safety and security. If this is a taste of what is to come in respect of a proposed embassy, one can only imagine how the adverse effect of protests will impact on the residents' safety and security during any construction period, let alone after the embassy has come forward.
- 10.21 The withdrawal by the MPS of their objection was seemingly on the basis of a PCLA<sup>80</sup> that was provided to the MPS by LBTH before its Committee meeting and so, presumably had been considered at the point at which the MPS objected during the Committee Meeting. RMCRA's position is noted in the MPS letter of 14 November 2024<sup>81</sup> where the MPS state their concerns on impacting the immediate vicinity and potentially attractive significant protest. In that letter, specific reference is also made to 47 protests outside the current Chinese Embassy in 2023 and 2024 with a significant number of protests with over 100 attendees.
- 10.22 On Saturday 8 February 2025, reports suggest that between 1,000-4,000 people attended the protest outside Royal Mint Court, including many attending from Hong Kong, Tibet, Chinese nationals and members of the Uyghur community – who expressed concern as to how a 'mega embassy' would be used. RMCRA wishes to make it clear that it was not involved in the organisation of this protest. The Inquiry is invited to consider the media reports.<sup>82</sup> It is clear, from the reported accounts of protestors that Saturday's protests were not purely aimed at the siting of the embassy, and as such the type of protest that would (in all likelihood) not arise again if permission was granted – but a wider protest of a type that could (and in the RMCRA's view, will) arise again if the embassy comes forward at this site.
- 10.23 A real concern should be the likely risk of repeat protests at the site, the possible size of the protests and risk of more extreme actions if, for example, the PRC were to act against Taiwan, Tibet or, indeed, seek further to take repressive measures against the Uyghurs or citizens of Hong Kong. This is not an issue that, with respect, the MPS appear to have considered in their letter of 10 February 2025.<sup>83</sup>

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<sup>80</sup> CD1.33

<sup>81</sup> CD4.27

<sup>82</sup> INQ3a PDF p23-33

<sup>83</sup> CD12.186

10.24 Undoubtedly the applicant will seek to minimise the impacts this protest had upon local residents, tourists and police resourcing – but the RMCRA wishes state that:

- a. Prior to the protest, the City of London Police issued an "Incident Alert – Incident Communication – Demonstration."<sup>84</sup> The alert was clear that "*Dependent on the numbers of demonstrators attending it may be necessary to temporarily close the highway at short notice... ...We would advise you considering alternative routes should you need to travel through the area during the relevant times.*"
- b. Cartwright Plaza and the Green were used by Saturday's protestors as a staging post.
- c. Extremely limited private security was provided at Cartwright Plaza, and a very small police presence at the Plaza. This was not reassuring to the residents.
- d. Police vans and the protest blocked one lane of traffic along East Smithfield. The need to accommodate police vans at the site does not appear to have been taken into account by the applicant, and the need to accommodate the police in the event of a protest, effectively results in a road closure/obstruction of traffic. Indeed, due to the size of the protest, the intersection at Tower Bridge Road and Tower Hill was closed by the police.
- e. The police presence was observed to increase as the protest took place – and this was in respect of what the residents observed to be a largely peaceful protest. Clearly this must have had a knock-on effect for policing London, and proves MPS original concerns in their objection that policing would require officers to be taken away from frontline duties. The position currently adopted by the MPS<sup>85</sup> is clearly incredible having seen how Saturday's protest unfolded.
- f. RMCRA has obtained a number of photographs of the protest,<sup>86</sup> so that the scale and location of the protest can be visualised for the benefit of the Inquiry. These photographs show crowds and police trying to contain the overspill, as well as knock on impacts on the road network.

10.25 The conclusions of the applicant's security witness state that protest activities would not interfere with other pedestrian activities or access to, and enjoyment of cultural amenities in the area.<sup>87</sup> Their Transport witness has provided evidence from an academic, and not real life, position.<sup>88</sup> The residents have now seen, first hand, the impacts that a protest could have on them and the surrounding area and it did not reflect the desktop evaluation carried out on behalf of the applicant.

10.26 In RMCRA's view, Saturday's protest shows that the applicant's belief is ill-founded. The blocking and closing of a major road within the vicinity of

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<sup>84</sup> INQ3a PDF p39

<sup>85</sup> As set out in CD12.01

<sup>86</sup> INQ3a PDF p34-38

<sup>87</sup> CD11.06 paragraphs 146,157,158,164

<sup>88</sup> CD11.07

key cultural amenities will clearly have an impact – both in terms of those travelling by car, bus or on foot being dissuaded to either continue their journey or make it in the first place. The scale of the protest, and the associated risk of disorder, is clearly something that would put people off planned visits to Tower Bridge, the Tower of London and St. Katharine's Dock. This simply common sense

- 10.27 It is clear from the Alert issued by City of London Police,<sup>89</sup> and the police presence from the start of the protest, that this was a protest that required a dedicated police response. Having now policed this protest, RMCRA suspect that the police would provide a dedicated presence at future protests.
- 10.28 Returning to the original MPS objection, the Crilly report was acknowledged by the MPS and their letter states that the vulnerability of the residents of St Mary Court should not be discounted.
- 10.29 The latest MPS letter to the Inquiry<sup>90</sup> has been of considerable concern to the RMCRA, and now even more since the protests on 8<sup>th</sup> February. The MPS has not ever attempted to engage with the residents to understand their concerns and certainly did not speak with them prior to, of after, submitting their revised letter. It makes no reference to Cartwright Plaza in the heart of St Mary Grace's Court, or bollards situated on Cartwright Street that are positioned to prevent a vehicle being used as a weapon and protect the proposed embassy but not St Mary Grace's Court from a bomb blast. Instead it seeks to focus on managing protestors, rather than engage with the threat of attack that could be so catastrophic for residents.
- 10.30 If a bomb exploded in the service road to the rear of the site, it would cause catastrophic damage. Clearly such an attack is foreseeable, but in withdrawing their objections, the MPS fails to grapple with these issues.
- 10.31 RMCRA has seen the extensive security precautions taken outside the new American Embassy at Nine Elms, ensuring they are safe from attack by hostile vehicles and bomb blasts. It remains unclear how these issues will be dealt with at this site. The previous American Embassy site in Grosvenor Square Mayfair, close to Oxford Street appears to have been recognised by the American government as being an unsuitable location because of constant protest and terrorist threats. Indeed, the decision to move the American Embassy from Grosvenor Square has been explained in an article published by the Washington Post in 2018<sup>91</sup> as coming down to practical concerns, the most important being safety.
- 10.32 RMCRA considers that if the applicant wishes to establish a new, consolidated embassy, it should follow the example of the USA and identify a more suitable site, which is not what is currently proposed.

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<sup>89</sup> INQ3a PDF p39

<sup>90</sup> CD12.186

<sup>91</sup> INQ3a PDF p40-43

10.33 The OR<sup>92</sup> sets out that security measures can be dealt with through conditions, after a grant of permission, but before occupation of the site. However, RMCRA's position is that the security issues both inside and outside the embassy need to be dealt with together, before any decision is made and this should be done in consultation with residents who are worried about becoming victims of terrorist attacks on the embassy or getting swept up in protests.

10.34 The applicant has set out its security plan for the embassy within its application, which are the same as they were in the original application that was refused. These are the same plans peer reviewed by Crilly Consulting Ltd and identified as being inadequate for the threats identified against the residents which are inherent in the choice of location.

10.35 The current applications before the Inquiry are in effect re-submissions of earlier applications that were refused by the LPA on 10 February 2021.<sup>93</sup> The reasons for the earlier refusal of permission related to safety and security, adverse impacts on local tourism, increased congestion of the local highway network due to potential protests and adverse impacts on heritage assets, again flowing from potential protests, acts of terrorism and security mitigation.

10.36 In the submitted Planning Statement in this application,<sup>94</sup> the applicant combatively sets out in respect of the earlier applications that the reasons for refusal are without merit and have no basis in planning policy. Given this, it is striking that an appeal was not made at that time. Based on the judgment of Andrews LJ in *R (Blacker) v Chelmsford City Council (Rev1) 2023 EWCA Civ 2*, as set out in the SoC<sup>95</sup> RMCRA considers that it is appropriate, in the context of these Applications, for the Inspector and the SoS to consider whether or not to recommend a departure from the previous decision and if so, provide an explanation for that departure.

*Concerns outside of the perimeter of the site*

Public Realm

10.37 The public realm immediately around the site is dominated by extremely busy traffic which creates a hostile environment. The public pavements around the site in the main are narrow. Following discussions between the applicant and RMCRA, the plans now partially mitigate this by pulling back the perimeter wall in a key area near the proposed visa section entrance, but it is not possible to make this type of change all around the site due to the lack of space.

Gatherings Outside the Proposed Perimeter Wall

10.38 It is RMCRA's view that such gatherings are most likely to take place in front of the listed railings at the Tower Hill entrance to the site. The space

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<sup>92</sup> CD9.04

<sup>93</sup> CD9.08

<sup>94</sup> CD1.06, paragraph 3.7

<sup>95</sup> CD10.01 paragraph 17 and appendix C

for people to gather there is very small and the likelihood of people spilling into the road at that point is high. RMCRA's concern is that the road would need to be closed to traffic to ensure the safety of the people gathered there and other pedestrians at this very busy junction. The Tower Hill junction is a major arterial route both north/south and east/west. Previous isolated incidents in that vicinity which have required the roads to be closed have caused gridlock in the surrounding roads for quite some distance away.

10.39 RMCRA has seen the evidence advanced on this issue by the applicant and the comments made by LBTH and is not reassured by it. The local residents understand and know the public realm around the site and are more than familiar with the traffic conditions. While LBTH and TfL may have reviewed the PCLA<sup>96</sup> and while the applicant has provided an updated assessment,<sup>97</sup> this does not reflect the lived in experience of the residents or what they expect to happen in the event of a protest or incident. There will be adverse impacts and risk of injury to pedestrians and other users of this area.

*Vehicular Access to the Site and Transport and Traffic Impacts*

10.40 Most vehicles will enter and leave the site via the service road off East Smithfield. The entrance to this service road is almost opposite the driveway to the entrance of the St Katharine's Docks estate through the "elephant gates". That entrance already has 'keep clear' markings on the road (which are rarely adhered to by drivers). RMCRA suggested that more use should be made of the entrance to the site off Royal Mint Street at the northern end of the service road, but we note that two-way traffic at the junction of the service road and East Smithfield is shown in the plans as filed. RMCRA's view is that this entrance/exit point will be dangerous for both drivers and pedestrians as things stand currently. Clearly this would be an unacceptable impact on highway safety.

10.41 Demonstrations at the site would potentially block the major arterial junction at Tower Hill and consequently the important river crossing via Tower Bridge as well as the route between the City of London and Canary Wharf and the important route from west to east London and vice versa. Disruption of this sort has now been witnessed in respect of a protest aimed at the proposed embassy, but has also been seen over the years as having been caused by a variety of disaffected groups, who make use of the iconic setting at Tower Hill junction to attract the world's media to their cause. This would clearly result in a severe cumulative impact on the road network and the RMCRA does not consider the applicant's evidence to be realistic or have taken into account this reasonable scenario.

10.42 Again, as seen on 8 February, such demonstrations can and do last for several hours, causing huge tailbacks of vehicles for some miles from the junction. On numerous occasions pedestrians have also been prevented by the Police from walking across the junction during a demonstration.

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<sup>96</sup> CD1.33

<sup>97</sup> CD11.07

The applicant seeks to address this<sup>98</sup> but such diversions are only straightforward if you know the area and it is relatively clear to negotiate, which RMCRA does not believe would be the case in the event of a protest or incident.

10.43 Clearly, what was seen on 8 February was a protest that had a profoundly adverse effect on the local road network and should be considered to show that the applications are contrary to the THLP – policies S.TR1, D.TR2, D.TR4 and the LP - policies T1, T2, T4. This is almost a paradigm example of a case in which residual cumulative impacts on the road network resulting from the development would be severe to the extent that the application of paragraph 116 of the NPPF requires that permission be refused.

10.44 Of further note is a pedestrian bridge entrance to the proposed 200+ PRC residential apartments being built for the embassy directly looking over St Mary Grace's Court. Pedestrian access to this entrance runs directly through both sides of our estate with a small square (Cartwright Plaza) directly in front of it. This provides an ideal area for protesters to occupy, disrupt, harass or worse embassy personnel coming and going from their apartments.

10.45 RMCRA raised in its case summary that it could not see that a recent traffic survey of the surrounding roads has been undertaken and submitted by the applicant to quantify the impact this development would have if granted. The applicant accepts that no such survey took place, seemingly because officers did not request it in respect of the previous application. The lack of survey on that occasion was considered by the applicant to be reasonable due to the unique effects that COVID-19 had been having in respect of being able to identify normal conditions. Of course, time has now moved on and that is not an appropriate justification for not undertaking surveys. It is also for the applicant to put forward evidence in support of their application and the impacts that it will have (or not have). In failing to provide traffic surveys, the applicant has failed to advance any realistic or real time evidence in support of their assessment of the impacts on transport and traffic in the A54.

10.46 RMCRA agrees and supports the comments made by Historic Royal Palaces<sup>99</sup> concerning public safety and security. More could be done in relation to the public realm, especially in Mansell Street. The area around the perimeter of the site would benefit from a more holistic and joined up approach to the treatment of the boundary, to provide wider public benefit and to give recognition to the importance of the local setting to the OUV of the ToLWHS.

*Impact on the UNESCO World Heritage Site*

10.47 RMCRA's objection remains as set out in its case statement. The LP makes clear that any development proposals in WHSs and their settings, including any buffer zones, should conserve, promote and enhance their

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<sup>98</sup> CD11.07 paragraph 6.5.1.5

<sup>99</sup> CD4.10

OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection.

10.48 It would be very concerning if these proposals were to jeopardise in any respect, the World Heritage status of the ToL – held to be the jewel in the crown of the LBTH. This is bearing in mind that the UNESCO status is being reviewed currently. It is not accepted by RMCRA that the proposal enhances the setting of the ToL WHS, given the impacts on traffic and transport that will clearly arise here.

*Overlooking of the Estate*

10.49 Despite the claims made by the applicant's planning witness<sup>100</sup> there will be no privacy, particularly in respect of residents of the 100 flats in St Mary Grace's Court in Cartwright Street if this development comes forward. The distinction the applicant appears to draw between residential and commercial buildings being 'commonplace' elsewhere in London, ignores the likelihood that this site will be occupied and active for 24 hours a day.

10.50 The rear elevation of the flats in St Mary Grace's Court are where many have their bedroom windows, are within approximately 10 metres or less from what will be a wooden fence separating them from the service road of the proposed embassy, running from south to north from East Smithfield to Royal Mint Street, parallel to Cartwright Street on the eastern side of the embassy site.

10.51 The residential building on the embassy site which will contain 230 flats, each with an open terrace balcony, is right beside this service road and would directly overlook the St Mary Grace's Court flats. It is difficult to see from the plans how the privacy of the existing residents in St Mary Grace's Court can be preserved in this situation, although there is some mention in the plans of building balconies which will be recessed into the repurposed office building on the site where embassy staff and visitors to the embassy will be housed.

*Impacts of Events at the Proposed Cultural Exchange Centre*

10.52 RMCRA understands that events will be held in the proposed Cultural Exchange Centre. The arrival and departure of large numbers of guests for these events will also potentially cause nuisance, noise and disruption for neighbouring residents. We understand that the LBTH Officers have spoken to the applicant about providing an EMP, something which TfL have also requested, as the increased traffic around events has the potential to cause hold-ups on East Smithfield, which is already very busy, as well as at the Tower Hill Junction where dignitaries will be driven into the site through the front gates.

10.53 Our understanding is that this Events Plan is to be secured as part of a Section 106 obligation, so we have not been able to view any such plan, but we consider it a material issue in respect of this site being granted permission as an embassy site.

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<sup>100</sup> CD11.05 paragraphs 10.20-10.23

10.54 The applicant claims that he has seen no credible evidence to support the concerns outlined above – but likewise RMCRA has seen no credible evidence to dismiss this concern.

*Conclusion*

10.55 Clearly, the views of those elected to represent residents locally were a cause for concern to the SoS, to the extent that it was called in – presumably to avoid a repeat of the refusal that was issued following consideration of the earlier applications for an embassy at the site. As such, RMCRA finds itself in the position where it fully expects, whatever the Inspector's recommendation, that the political will and desire is to grant permission for the applicant's proposal.

10.56 However, before that stage is reached, the Inspector is tasked with considering this application fully and in doing so it will need to understand and assess RMCRA's objections. In response to those objections, the applicant has, in RMCRA's view, sought to minimise its concerns by seeking to make them appear to be trivial in nature or issues that can be addressed without having a first hand, real life, understanding of the day-to-day conditions that residents live with in terms of existing traffic and transport. It will be interesting to see how the applicant responds to the real experience that was seen, and felt, by the local residents on 8<sup>th</sup> February.

10.57 In respect of the RMCRA's evidence as to the real security concerns that the site presents if used as an embassy, the applicant has sought without factual basis, to downplay the qualifications and experience of those behind the Crilly Report and in doing so sought to rely on a witness who, by his own admission, is not a security expert. The applicant's security evidence should be treated with considerable caution.

10.58 The Inspector is invited to recommend refusal of permission for this development, for the reasons given by the RMCRA.

***Interparliamentary Alliance on China<sup>101</sup>***

*Introduction*

10.59 IPAC is an international, cross-party group of around 300 legislators in 40 parliaments, spanning the political spectrum, united in the belief that the Chinese Communist Party (CCP) under Xi Jinping represents a challenge to the rules based and human rights systems. IPAC is a very broad ideological alliance. The authorities in Beijing seek to mischaracterise us as an anti-China group. This is false. Many members of IPAC have a long-standing and profound love for China and its people, and IPAC is staffed and supported predominantly by diaspora groups.

10.60 The UK caucus of IPAC is 35 MPs and peers from all major parties. Its co-chairs are Sir Iain Duncan Smith MP for the Conservatives and Baroness Kennedy of the Shaws KC from the Labour Party. IPAC's members include representatives from the Liberal Democrats, Scottish National Party,

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<sup>101</sup> INQ4

Green Party, and Independents. Some have been sanctioned by the Chinese Communist Party for raising the mass torture, rape, forced sterilisation, and incarceration of Uyghur and other predominantly Turkic minorities in China.

10.61 There are three points IPAC wishes to make:

- i. the reversal of the positions of the MPS and LBTH.
- ii. the contention that space for protest on the site is sufficient.
- iii. national security concerns.

*MPS/LBTH Position*

10.62 The sudden and dramatic reversal of the MPS and LBTH position on this matter may not have been informed or influenced solely by material planning issues.

10.63 In his meeting of 18 November 2024, the Prime Minister Sir Keir Starmer, met with Chairman Xi Jinping and said:

*"You raised the Chinese Embassy building in London when we spoke on the telephone'*  
*'And we have since taken action by calling in that application. Now we have to follow the legal process and timeline.'*

10.64 It is at least arguable, based on the Prime Minister's own words, that the call-in was announced pursuant to diplomatic pressure from Beijing.

10.65 That the PRC has made this matter a diplomatic priority is beyond dispute. Here is one recent State media report, and (translation from an editorial commentary):

*"To put it bluntly, permission for the new premises of the Chinese Embassy is a matter of words from the Starmer government. Only if the British side shows sincerity can Sino-British relations really get back on track."*

10.66 This pressure has been backed up with tit-for-tat threats. The Guardian newspaper reported in December 2024 that China has refused the UK permission to renovate our embassy in Beijing as a retaliatory measure, pending approval for their application. It was further reported that, after the last planning application submitted by the Chinese Government was refused, the Chinese side made known to ministers that they would not appeal or apply again until assurances had been given.

10.67 It is therefore established that China is putting the UK under considerable pressure to permit the development, and, indeed, that the call-in may well have been a response to that pressure.

10.68 On 14 January a letter was sent to the Planning Inspector by the FCDO/HO, which effectively gave notice of the withdrawal of the objection

of the MPS.<sup>102</sup> Three days later, the MPS confirmed the withdrawal of their objection by letter.<sup>103</sup>

- 10.69 There is some reference buried in the documents to the MPS decision having been taken on 8 January. However, the formal communication of the MPS withdrawal to the Planning Inspector was 17 January - after the letter from the FCDO/HO.
- 10.70 We do not know why two SoS felt it necessary to give advance notice of the Police's withdrawal. The public understanding is that the MPS are operationally independent, and that their decisions regarding public safety ought to brook no interference. Whatever the true sequence of events here, it is clear that the government lost no time in communicating a decision to the Inspector which ought properly to have been communicated formally by the MPS.
- 10.71 It is believed that these two facts, taken together or separately, clearly indicate that the government is minded to permit the application for diplomatic reasons. The reasons for the call-in is difficult to sustain.<sup>104</sup> Diplomatic pressure is not a material planning issue, and ought not to feature in consideration of the merits of the application at any level - LBTH, the Planning Inspectorate, or Central Government.
- 10.72 It is noteworthy that MPS said publicly that the 2022 PCLA, on which the MPS objection turned, was provided by LBTH. We do not know why LBTH, would send a document from a previous application to the MPS. It is unknown why the MPS considered information from the applicant more credible than the MPS' own more recent assessment from Dec 2024. Who sent this information from LBTH, and at whose prompting is unknown.
- 10.73 LBTH is supportive of the application, despite the 7 February LBTH statement, which indicates that the December rejection stands.<sup>105</sup> So LBTH appears to have gone from unanimous rejection, to furnishing the MPS with obsolete documents from a previous application, to withdrawal of their opposition, to reiteration of their opposition to the application on 7th February. It appears that the 7 February statement by LBTH has had no impact on the their posture, which is rather confusing.
- 10.74 It is noted that LBTH's rejection relied entirely upon the MPS objection. Yet this is not what the LBTH said. On 10 December 2024, the LBTH press release, pursuant to the December extraordinary hearing said:  
*"The committee rejected the application due to concerns over the impact on resident and tourist safety, heritage, police resources and highway safety given the congested nature of the area."*
- 10.75 It is not known who was responsible for these decisions, or who advised the MPS that they could take into account a document from a previous application. But believe that the gaps in this knowledge, together with

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<sup>102</sup> CD12.02

<sup>103</sup> CD12.01

<sup>104</sup> CD3.01

<sup>105</sup> See INQ3a for a copy of the statement, PDF p1

erratic and contradictory statements from some of the key parties mean that there is at least a case to answer that these decisions were influenced by forces other than the merits of the application. Indeed, it remains unclear as to LBTH's position.

- 10.76 It is for this reason that many of the Members of Parliament are supportive of the letter to the Inspector on 6 February from the Rt Hon Robert Jenrick,<sup>106</sup> in which he requests that the power of summons is used, under s250(2) of the Local Government Act 1972. The ruling is noted. The fear which led to the letter was that there is correspondence between people who are not listed to appear as witnesses, and which is not published. It is felt that such correspondence would settle the question of whether or not the reversals of position were influenced by matters other than the merits of the applicants' proposal.
- 10.77 Connected to this, the matter of procedural regularity with respect to the consultation is raised. A group of parliamentarians wrote to the Planning Inspector on 9 January<sup>107</sup> to raise concerns about interference in the planning consultation process. Of the letters received in support of the application, 7 were from State-owned enterprises, 4 from large Chinese companies, heavily subsidised by the Chinese State, 3 from Overseas Chinese Organisations. In addition to these representations, there were 73 handwritten notes, collected at an exhibition hosted on the site by the Chinese Embassy, and then a further 32 responses which were entirely identical.
- 10.78 Many, if not all, of these responses should be discounted. It is improper for entities owned or subsidised by the applicant to be taken into account as legitimate expressions of support, and given equal weight to objections from actual residents.
- 10.79 In respect of three Overseas Chinese Organisations who made representations, it must be noted as a matter of serious concern that these are organisations linked to the United Front. The United Front Work Department and its affiliated organisations have been the subject of warnings from MI5, the former Security Minister, named in joint statements between the FBI and MI5 chiefs, and Parliament's Intelligence and Security Committee in their 2023 report on China. Individuals associated with the United Front are numbered in their tens of thousands and operate abroad to exert control over overseas Chinese and to influence UK institutions and individuals. Representations were made in favour of this application by United Front linked groups. This is a security concern and undermines the procedural propriety of this application.
- 10.80 Chinese State-Owned Enterprises will also be making in-person representations to the Inquiry; Petrolneos and China General Nuclear International are owned by the applicant.

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<sup>106</sup> CD12.185

<sup>107</sup> CD12.124

### *Space for Protest*

10.81 It is noted that the modelling done for the applicant, and included in the LBTHs SoC, makes no reference to most of the large anti-Chinese Communist Party protests organised by diasporic groups in London alone. Instead, we have a breakdown of just the protests which occurred outside the location of the current embassy, Portland Place.

10.82 It is important to state that local residents were not part of the organising committee of the protest at the site on 8th February.

10.83 Portland Place is also an inappropriate location for an embassy. It is not safe to protest there without blocking the road, which is why many of the larger protests have had to be held elsewhere. Although a list of protests, together with their size, was read out during the SDC meeting in December, those numbers have been excluded from the minutes for the meeting.<sup>108</sup>

10.84 In 2022, between 4-5,000 Hong Kongers congregated in parliament square. Also 2022, over 1000 congregated in the park near Tower Hill. In 2023, approx. 3,000 gathered in parliament square, and a similar number on Trafalgar Square in the same year. There have been numerous other 1,000+ protests in different parts of London.

10.85 When diasporic groups have gathered elsewhere, particularly Hong Kongers, they have done so in deference to local authorities, because they did not wish to cause unnecessary disruption in Portland Place. This good will has entirely evaporated, due to their frustration with current UK China policy, and with what they see as a diminution of their right to free assembly and speech.

10.86 Many believe the Chinese Embassy needs to move. Apart from anything else, the current Portland Place location does not support free protest, hence why demonstrators have had to meet and protest elsewhere. The omission of large anti- Chinese Communist Party protests from those who have produced expert analyses regarding pedestrian comfort is a serious deficiency.

10.87 But, given the huge increase in the number of people disaffected with the behaviour of the contemporary Chinese Communist Party, the Royal Mint Court location falls foul of this same criterion in a way that these groups find unacceptable. They were not around when Portland Place was designated for embassy use. They are here now, and, if the embassy has to move, they believe strongly that it should be somewhere they can freely assemble and express their fundamental rights.

10.88 On 8 February protestors gathered for a demonstration. IPAC estimate that around 4,000 - 5,000 people attended this protest, but the MPS estimate was lower.

10.89 For the sake of argument, IPAC have used the MPS' lower estimate. This happens to be around the same number of people that the MPS claims

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<sup>108</sup> CD9.05

can safely be accommodated at the site, based partly upon the PCLA. It thus provides a useful guide as to the accuracy of this assessment.

10.90 The protest brought considerable disruption to the area. For a period of around 30 minutes, no traffic was moving towards or away from any of the roads leading to Tower Hill junction. For a period of around three hours, the area suffered major road closures. Further, demonstrators found objectionable the efforts by the MPS to move them up Mansell Street, where they could not hear the speakers. At this stage of the protest, demonstrators filled a large portion of Mansell Street, which had been entirely closed for the protest. They could not be accommodated on the pavement, contrary to the PCLA modelling.

10.91 This demonstrates that:

- Protesters wish to congregate in an area opposite the embassy entrance, where more than a few hundred gathered necessitates disruption of the adjacent road network.
- Protesters do not wish to be kettled or separated from each other. Many had to balance on traffic islands, or even on the pavements surrounding the ToL to avoid threat of arrest by the police.
- These protests are difficult to police. When restrictions were imposed, nobody knew precisely where demonstrators could and couldn't stand. This resulted in the blockage of the entire area, and two arrests.

10.92 Those relying on non-objection may attempt to argue that the 8th February was a one-off, but further protests have been planned, including on 15 March. Further protests will take place on some, if not all, of the following dates, which carry meaning for various diaspora groups:

- 25 April, a day remembered by oppressed Falun-gong practitioners,
- 19 May, the anniversary of the Urumqi massacre,
- 4 June, the Tiananmen massacre anniversary,
- 12 June, anniversary of the million person march in Hong Kong,
- 29 September, Hong Kong Umbrella movement commemoration,
- 1 October, Chinese Communist Party's establishment of the People's Republic regime,
- 26 November, Commemoration of the Blank Paper Movement.

10.93 This is sufficient to rebut the assertion that there is no evidence that large protests are planned at the site, and, that 2,000 can comfortably be accommodated within the area for protest.

#### *Security Concerns*

10.94 Though some of these fall outside the remit of the Inquiry, at least one pertains specifically to this location, and IPAC are raising these to put these matters on record for consideration at a future stage.

10.95 In the letter<sup>109</sup> from the Former Security Minister and others to the Inspector, the presence of highly sensitive cabling running directly

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<sup>109</sup> CD12.124

underneath the Royal Mint Court building was raised. This cabling apparently feeds the City of London, the powerhouse of the UK economy.

10.96 In the past year alone, the PRC has been officially accused by the United States government of embedding malware in US critical infrastructure which had the ability to disable it, and hacking US telecommunications infrastructure leading to the compromise of sensitive data at the US treasury. It is worth placing on record, therefore, that the government of the PRC has shown itself willing to attempt to gain control over precisely the kind of critical infrastructure that is running directly under this site. This, we argue, is an obvious national security risk which pertains specifically to this application.

10.97 There is a body of evidence to suggest that interference and transnational repression activities increase with Chinese state resources and personnel. It is not an unreasonable assumption therefore, to conclude that hundreds more Chinese state employees operating from this site will bring an attendant increase in malign activities.

*Conclusion*

10.98 While the Vienna Convention does indeed require states with diplomatic relations to accommodate each other's embassies, it does not place a "special duty" upon host states to permit a huge status symbol development which poses credible security risks, which would disrupt and alter local communities, and which would preclude the exercise of the legitimate rights of those who wish to protest.

***Friends of St Katharine's Docks<sup>110</sup>***

*Introduction*

10.99 There has been extensive and considerable engagement by Friends of St Katharine's Docks (FOSKD) with the proposals for the redevelopment of Royal Mint Court over many years.

10.100 FOSKD strongly opposes the proposed redevelopment of Royal Mint Court to provide a new embassy. In summary the development for which permission is sought:

- Creates a serious safety and security risk for residents, tourists, and the public generally, contrary to Policies D11, SD6 and objective GG6 of the LP and D.DH2 of the THLP
- Will have a severe impact on the highways network, by virtue of the nature of the protests it is likely to attract, in combination with its location in very close proximity to a critical junction for arterial roads on the highway network, contrary to LP policies T1, T2, and T4 and THLP Policies S.TR1, D.TR2, D.TR4 and NPPT para. 115-116
- Fails to promote community cohesion and the equalities objectives under section 149 of the Equality Act 2010; and,
- Will cause harm to the significance of a range of designated heritage assets, including those of the highest significance, creating a strong

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<sup>110</sup> INQ5

statutory presumption against the grant of planning permission under section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and in conflict with London Plan policies HC1 and HC2, Local Plan policies S.DH3 and S.DH5, and the suite of policies in Chapter 16 of the NPPF.

*FOSKD*

10.101 FOSKD is a residents association whose objects are to promote, protect and enhance the area known as St Katharine's Docks.

10.102 It is important to be clear at the outset, FOSKD is not anti-development. Its members are not NIMBYs. Indeed, it has historically supported the redevelopment of the Royal Mint Court site, for example writing to the LBTH expressly to support a proposal by Delancey for an office/ retail redevelopment. Planning permission for that development was subsequently granted.

10.103 Rare as it may be for residents associations actively to support nearby development, that is the approach FOSKD takes, provided what is proposed is appropriate.

10.104 The problem is that the proposals before this Inquiry are not at all suitable or appropriate for the Royal Mint Court site.

*Engagement*

10.105 FOSKD has sought actively to engage with proposals to redevelop Royal Mint Court to provide a new Chinese Embassy in the UK since it was first proposed. In 2021, FOSKD wrote in objection to the previous (near identical) application for which permission was subsequently refused. FOSKDs Chair spoke in opposition to the proposals at the meeting of the SDC on 1st December 2022, when members resolved to refuse to grant planning permission, with the decision notice (which was not appealed) issued on 10 February 2023.

10.106 Subsequently, on 9 December 2024 FOSKDs Chair was the only local resident to speak at the SDC meeting at which LBTH resolved that it would have refused to grant planning permission for the proposal.

10.107 For the avoidance of doubt, the minutes<sup>111</sup> of that meeting do not fully record the contributions made by FOSKD and some of the other objectors, and FOSKD have written to LBTH asking them to explain this. For example, at that meeting, FOSKD did not read out the presentation which it had prepared on its own behalf. Rather, as was made abundantly clear at the time, because the Council had declined to permit the Chairman of the Royal Mint Tenants and Residents Association (TRA) to speak, FOSKD read out a statement drafted by and presented on behalf of TRA. The minutes omit this, and as a consequence misrepresent FOSKDs position. Indeed, those minutes omit many comments made by the objectors in the Q&A part of the meeting, and it would be wrong to

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<sup>111</sup> CD9.05

place any material reliance upon them without reviewing the recording of the hearing.

10.108 It should also be noted that those minutes include in the reasons for refusal as the adverse impacts on residents. Neither the Decision Notice issued by LBTH nor the summary of the reasons for refusal contained in 1.5 and 3.2 of their Revised SoC<sup>112</sup> and 3.26 of the applicant's SoC<sup>113</sup> make any reference to this important aspect of the Committee's reasoning, which may explain the applicant's failure adequately to address those impacts.

10.109 Despite the considerable attempts FOSKD has made to engage in relation to the proposals, it does not recognise the applicant's references to 'extensive' or 'comprehensive' consultation in relation to this application.

10.110 It is true that, on 16 July 2024, the applicant informed FOSKD that it had re-submitted the same plans to the Council and that representatives of the applicant have historically held meetings with FOSKD and the TRA. However, FOSKDs understanding is that the applicant has never met with anyone from the TRA, notwithstanding a written request from its Chair for such a meeting. At most, members of TRA received leaflets advising them of a consultation event on the afternoon of 15 September 2024. This was in fact a reference to the exhibition in Royal Mint Court which had been open for some days by that point (but the prior opening of which was not advertised to local residents). In order to participate, attendees were required to scan a QR code and provide personal data to enable attendance. The effect of this was that attendance by local residents wishing to object (who for obvious reasons did not wish to provide those personal details to the applicant) was discouraged. It is hardly surprising, therefore, that the outcome was receipt of just 13 completed comment forms.

10.111 Indeed, despite FOSKDs repeated attempts to engage, it has ended up in a position where it feels entirely disenfranchised. Twice, FOSKD has appeared before the democratically elected members of LBTHs planning committee to object to this proposal. Twice that committee has resolved to refuse to grant planning permission. And yet, there is now a situation where (without any further meeting of its planning committee) LBTH has performed a *volte face* and is no longer putting up any resistance to the grant of planning permission or listed building consent.

10.112 The reason given for that change in position is said to be the MPS own U-turn, communicated in an email of 8 January 2025 from its 'Head of Estate and Strategy Management.'<sup>114</sup> The MPS has gone from a position where they wrote a clear and considered letter of objection, dated 14 November 2024<sup>115</sup> identifying cogent concerns with the proposed development, endorsing the position in the Crilly Consulting Design Peer Review Paper and noting the objections raised by the residents of St Mary

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<sup>112</sup> CD9.07

<sup>113</sup> CD11.01

<sup>114</sup> See CD9.08, appendix 2 page 31

<sup>115</sup> CD4.27

Grace's Court, followed by Chief Inspector Dave Hodges speaking in opposition to the application before the SDC on the basis of significant operational concerns, to one in which MPS removed its objection.

10.113 What precisely has occurred is opaque. The correspondence raises more questions than it answers:

- a. As regards the MPS, its letter of 17 January 2025<sup>116</sup> suggests somewhat disingenuously that subsequent to the SDC meeting on 12 December 2024 a PCLA<sup>117</sup> which was not originally included within the planning application documents) was provided by LBTH to the MPS. To the extent this is intended to convey the notion that that report was new to the MPS it is wrong. The MPS says that it was advised to take that assessment into account as a material consideration. How or why this occurred, and what else was said or by whom, is unclear. Even following receipt of that assessment, the MPS position is that there remain some differences of opinion but what those differences are is left unsaid. All we know is that on balance it purports now to accept that there is sufficient space for future protests to be accommodated. The substance of that position (and why it is unsustainable) is addressed below but the reasoning underlying the change of position is unexplained.
- b. At or around the same time, the SoS for the HO and the SoS for the FCDO wrote a joint letter<sup>118</sup> in which they indicated in principle support for the proposal. In that letter they referred to being informed that the MPS had withdrawn their objection. The inference, of pressure mounting 'behind closed doors', is obvious. It is of such concern that, on 25 January 2025, the Shadow SoS for Housing, Communities, and Local Government wrote to the Prime Minister specifically on this issue, asking "*is this yet another example the police have been pressured by Ministers and special advisers?*" A similar question posed to Baroness Darlington (Parliamentary Under SoS in the FCDO) in the House of Lords, on 29 January 2025, also went without substantive answer. FOSKDs position is that the MPS change of position was the result of an improper process.
- c. As regards LBTH, what position it is in fact taking is unclear. In a statement issued on 7 February 2025,<sup>119</sup> LBTH has suggested that it is the timetable for the Inquiry that is preventing its active opposition, stating "*given the timescale for the Public Inquiry, the Council is not able to formally submit additional evidence about the removal of the Metropolitan Police's objection. However, the Committee's decision and its substantive reason stands, and it will be in front of the*

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<sup>116</sup> CD12.01

<sup>117</sup> CD1.33

<sup>118</sup> CD12.02

<sup>119</sup> INQ3a PDF p1

*Inspector so that she can see what stance the Council would have taken at the Inquiry had the Metropolitan Police felt able to maintain its objection".* That does not appear to be consistent with LBTH position in the PoE of their planning witness. Regardless:

- i. LBTH does not appear fairly to have considered the evidence in the round, including in particular the position of Crilly, who are experts in this area, and who have written further on 4 February 2024<sup>120</sup> rebutting the position taken by the applicant and re-iterating their original conclusions. Nor have they considered the recent protest which took place on 8 February 2025, the effects of which would appear only to support the RfR;
- ii. As LBTHs planning witness appears to recognise,<sup>121</sup> the reason for refusal was multifaceted. It did not relate solely to highways impacts or security concerns, but also to the nature of this particular *sui generis* use in this specific location, to the likelihood that this iconic and constrained location opposite the WHS would, with the development in place, become the focus for events and potentially large-scale protests and to the impact on the amenities/ enjoyment of Royal Mint Green as a local open space and the extended WHS setting within the public realm. These are matters which remain unchanged by the MPS U-turn, and which LBTH was clear it did not think could be adequately mitigated through planning conditions or other mechanisms. Why its approach to them has changed is entirely unexplained.

10.114 Overall, taking the above together, the clear impression is of a proposal which is being steamrollered to consent by government. It would appear that improper pressure has been and is being applied to secure the grant of planning permission for this development, in circumstances where FOSKD understands that the UK Government has historically written to the applicant stating, 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 PRC in London. All of this points, in essence, to an abuse of the powers arising under the Town and Country Planning Act 1990.

10.115 In those circumstances, and noting that the above simply cannot be cured through the Inquiry process, FOSKD has done the best it can to present its position on the relevant planning issues, within the constraints of its resources and in circumstances where objecting to this development requires considerable fortitude.

#### *Safety and Security*

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<sup>120</sup> CD10.02

<sup>121</sup> CD9.08 paragraph 5.3

10.116 FOSKDs concerns regarding safety and security are well-documented and long-standing. The issue was raised in FOSKDs letter of 16 November 2022, to which there has been no adequate response.

Protest

10.117 There does not appear to be any dispute that regular large-scale protests can be expected if an embassy on the scale proposed is constructed at Royal Mint Court. Even with an embassy on a much smaller scale, there were 47 protests at the PRC's site on Portland Place during 2023 and 2024, with 7 protests attracting in excess of 200 participants, and more than 20 protests in excess of 100 participants.

10.118 Indeed, as recently as 8 February 2025, a demonstration took place outside Royal Mint Court itself at which FOSKD understands in excess of 2000 people participated.

10.119 As that protest demonstrated, given the characteristics of the site's location, this level of activity results in considerable disruption:

- a. The effect of the protest was, as FOSKD had always predicted, and as both the Council and the MPS agreed until the their regrettable change of position, that the entirety of the Tower Hill junction (including Tower Bridge and other major arterial routes on the strategic highway network) had to be closed for approximately 1.5hrs. This had a knock on effect with roads to the south of Tower Bridge also being shut down. In short, the very 'severe' transport impacts FOSKD has always maintained will be caused, were demonstrated.
- b. Prior to the closure of the Tower Hill junction, there was a period of time during which conflicts between vehicles and pedestrians were frequent and unavoidable. Drivers were understandably frustrated by the number of pedestrians who could not help but intrude on the carriageway, resulting in an obvious highways safety issue, again – exactly as FOSKD expected.
- c. A substantial level of police resource had to be diverted to manage these issues, with large numbers officers not only from the City of London Police, but also from other forces visibly present.
- d. The protest could not be contained in the way the MPS would appear to have hoped. Where the designated protest areas were said to be was unclear, but what was obvious was that their capacity was totally insufficient for the number of protestors present. That is before there is even an embassy on the site. The position is only likely to be exacerbated when the large-scale protests are inevitably carried out at the gates of a working embassy.

10.120 The position to the contrary, now apparently taken by the MPS, simply is not tenable and has now been thoroughly debunked by the events of the 8 February.

10.121 The MPS change of position appears to rely upon the applicant's PCLA.<sup>122</sup> Dating from 2022, this is not a new document. Indeed, it was referred to at the SDC meeting, and it is disingenuous to suggest that it only came to light later.

10.122 The suggestion advanced, in reliance upon that assessment, that a protest of 2000 people could comfortably be accommodated in the area directly adjacent to the front of the Royal Mint Court site is erroneous and is obviously inconsistent with what occurred on 8 February. FOSKD does not believe that relevant Officers have visited the site, or properly understood its layout.

10.123 One particular error is that a slip road has been omitted for consideration in the applicant's abovementioned assessment. This is an area of TfL strategic highway and should not be mistaken for pavement. This appears to have been omitted from Figures 3 and 4 of Appendix D of the PCLA. The missing slip road is very important, as it will remain in situ and it allows vehicles moving southbound on Mansell Street, to turn right into East Smithfield in order to head towards the west bound Embankment. It also accommodates a taxi rank, and FOSKD is aware that the applicant has requested that TfL provide dedicated parking spaces on the slip-road for police vehicles.<sup>123</sup>

10.124 Once this is understood, the capacity of the area relied upon is much less than assumed in the PCLA.

10.125 In respect of protests to the rear of the site, the MPS suggest that these would be unlikely because they consider that protestors are unlikely to congregate at the rear of an embassy if there is no access and no ability to be seen or heard by those inside is entirely (and inexplicably) inconsistent with the MPS previous position.<sup>124</sup>

10.126 It also suggests a troubling lack of awareness regarding the 'on the ground' position. Half-way up Cartwright Street (a dense residential area) is the main pedestrian entrance to the embassy, to be used by staff working and living there, and by visitors other than the dignitaries granted access through the large gates fronting onto Tower Hill. This is what is referred to as the back of the site by MPS. To the north, on Royal Mint Street, is the exit for cars departing the embassy, including staff and visitors' cars. Larger vehicles such as lorries and vans, will exit the service lane via East Smithfield, the same way as they came into the site,

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<sup>122</sup> CD1.33

<sup>123</sup> For ease, the above have been highlighted in the FOSKD transcript (INQ5 Appendix 1). Image 3 shows a Google streetview image of the front of the site with red colouring. Image 4 is an annotated version of figure 3 which identifies the omission of the slip road.

<sup>124</sup> Image 5 of appendix 1 INQ5 shows the eastern perimeter of the Site, in particular where the main pedestrian entrance to the site is located on Cartwright Street, as well as showing the close proximity of the rear of St Mary Grace's Court flats to the start of the proposed diplomatic area marked by the wooden fence which would be replaced by another wooden fence according to the applicant's plans.

as Royal Mint Street is too narrow. FOSKD has safety concerns regarding these large vehicles trying to exit right or left out of the service lane onto East Smithfield as it is a very busy dual carriageway and the exit point is on a blind corner.

10.127 Those protesting on the eastern or northern sides of the site will be highly visible to embassy staff and visitors. This is not a case of there being "no access and no ability to be seen or heard" as the MPS now seeks to suggest. Indeed, local residents already have some experience of protestors (from Extinction Rebellion) using Cartwright Street and the small Council owned green space directly opposite the pedestrian entrance to the proposed embassy site to assemble.

10.128 Indeed, during the protest on 8 February 2025, the MPS themselves appear to have barricaded a large number of protestors on Mansell Street, to the north-west of the site.

10.129 These clear misunderstandings underlying the revised position of the MPS are the cause for significant concern by FOSKD.

10.130 FOSKD represents local people. It understands the local area. It knows that the effect of protests on the scale anticipated will be to cause widespread disruption, and the evidence to support that understanding is now overwhelming.

#### Terrorism

10.131 FOSKDs concerns about the potential threat from terrorism as a result of the development are backed up by cogent evidence, in the form of the Crilly Report and subsequent letter of 4 February 2025.<sup>125</sup> Indeed, as already outlined above, until very recently, FOSKDs concerns were supported by the MPS, before their inexplicable U-turn.

10.132 Crilly's evidence concerns security design and vulnerability. They are experts in security design and bomb blast engineering. They applied a risk assessment methodology based on ISO 31000, being the methodology advocated for individual site terrorism risk assessments by the Home Office Protect UK, MI5, the National Protective Security Authority, and RIBA. That was the assessment methodology used, in part, because the applicant's own consultants (Cundall) had used it, and the Crilly Report includes a peer review of the applicant's assessment.

10.133 Applying that methodology, Crilly has identified the vulnerability and flaws in the security design. It has identified that the development brings a very high threat of potential terrorist and activism attacks that was not previously present, and that local residents and their homes are within a collateral damage zone for the part of the embassy most vulnerable to attack, with a design that has focused on protecting embassy assets and occupants, rather than nearby residents, and with inadequate mitigation for the potential threats and scenarios identified.

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<sup>125</sup> CD10.02

10.134 By contrast, the applicant's security witness has applied the wrong methodology. The Crilly letter of 4 February<sup>126</sup> makes clear that the use of a 'Probability Yardstick' methodology is appropriate when considering the level or risk for the country as a whole, taking a broad-brush approach. It is not the correct methodology to apply when considering a specific site in a specific location with its own target profile, asset attractiveness, and vulnerabilities. This fundamentally undermines the applicant's evidence on this issue.

10.135 Applying the correct methodology, the result is that the proposed development would have a serious adverse effect of the safety and security of local residents. Appropriate steps have not been taken to reduce vulnerability, to increase resilience, or to maintain and ensure public safety and security.

10.136 These are not issues to which Article 22.2 of the Vienna Convention provides an answer. They relate to the intrinsic vulnerabilities and failings in the applicant's design, which should have been cured through appropriate design solutions. It is no answer to say that the fact is that protection and policing have to be provided. The embassy might benefit from that protection, but local residents will be placed at greater risk, for the reasons identified by Crilly.

### Conclusion

10.137 The proposed development would result in adverse impacts to safety and security, contrary to the THLP, policies D.DH2 and the LP, policies D11, SD6 and objective GG6.

### *Highway Impacts*

10.138 The impact of the proposed development on the strategic highway will be severe, not least given the likelihood of protests as identified above. As will be apparent from the images referred to, and from the Inspector's site visit, the pavements around the site are narrow, providing very little space for demonstrations without the risk of the protestors spilling onto the roads. If that were to happen outside the front of the embassy, the MPS would undoubtedly have to close the arterial road junction for the safety of the protestors.

10.139 This would have severe impacts on the surrounding road network. The site is adjacent to critical junctions between major arterial highways at Tower Hill. Specifically, it lies next to:

- a. The northern end of Tower Bridge approach road, which is a vital and well used river crossing;
- b. Tower Hill/ East Smithfield/ the Highway which is the arterial route for traffic coming from the Victoria embankment on the north side of the river and the City of London to access east London, Canary Wharf, and City Airport.

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<sup>126</sup> *Ibid*

10.140 These are extremely busy roads and although the applicant's transport report<sup>127</sup> suggests that traffic in this area has decreased over recent years, residents who have lived in the vicinity for many years, strongly dispute this assertion. Regardless, the effect of the proposed development on the highways network will be severe such that planning permission should not be granted.

10.141 Indeed, faced with this reality, the architects for the scheme, previously suggested (early in the consultation process) when local Councillors and residents raised their concerns about the impact an embassy on the site would have on the existing high levels of traffic, that the Council should simply consider diverting some of the existing traffic to other surrounding roads. This glib remark emphasised the lack of understanding of the local traffic problems by the architects from the outset, as rerouting traffic in that way is simply not possible.

10.142 The proposals are contrary to the THLP policies S.TR1, D.TR2, D.TR4 and LP policies T1, T2, T4. Indeed, this is a case in which the residual cumulative impacts on the road network resulting from the development would be severe, such that applying para. 116 of the NPPF planning permission should be refused.

#### *Community Cohesion*

10.143 Section 149 of the Equality Act 2010 requires public authorities to have due regard to the three equality objectives. That is a duty with which both the Inspector and the SoS must comply. It is an integral and important part of the mechanisms for ensuring the fulfilment of the aims of anti-discrimination legislation and requires rigorous consideration of the equality objectives with a proper and conscientious focus upon the relevant statutory criteria.

10.144 LBTH is the most densely populated local authority in England. It is a diverse Borough (with 69% of its population from Black, Asian and minority ethnic communities) where cohesion is celebrated and division resisted. The applicant has not identified how the proposed development would contribute to this cohesion. On the contrary, its proposal fails to promote the objective of fostering good relations between persons who share protected characteristics and persons who do not share them. Notwithstanding the lip-service paid to holding community events in the proposed Cultural Centre, what is proposed is a massive and inward-looking development which fails to consider, let alone promote, the objectives under section 149 of the 2010 Act. This too weighs against the grant of planning permission.

#### *Historic Environment*

10.145 Finally, the site is located in an area the historic character of which is, undoubtedly, highly sensitive to development. The site itself is in the ToLCA, as well as the buffer zone and setting of the ToLWHS which lies

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<sup>127</sup> CD11.07

immediately to the west and to the significance of which the site contributes.

10.146 The ToL is itself a Scheduled Monument (SM), and is comprised of a number of listed buildings graded as being of the highest significance (Grades I and II\*).

10.147 The site itself also contains numerous designated heritage assets, most notably the Grade II\* Royal Mint, and is located within an area of designated archaeological importance (Tier 1 Archaeological Priority Area: Tower of London, St Mary Grace's and Tower Hill) with the foundations of the Abbey of our Lady of the Grace's, built between 1348-50, the only Cistercian religious house built in an urban area, on the site. The transept of the Abbey was built across numerous plague pits where many who died in the black death are still interred.

10.148 In terms of the surrounding historic environment, this is a highly sensitive location in which to carry out development.

10.149 What is proposed does not, however, appropriately or sensitively respond to its historic context. Rather, the development will adversely impact upon the significance of the designated heritage assets identified above.

10.150 In particular, the ToL is a symbol of London. A building instantly recognisable across the globe, the extraordinary significance of which is beyond dispute.

10.151 The UNESCO inscription identifies concern that the wider setting of the Tower, an area that was created to dominate its surroundings, has been eroded, with new buildings eroding its visual dominance (a key aspect of its significance), and notes that development in its immediate and wider setting continues to be threatened by proposals for new development that is inappropriate to the context. Indeed, it states that "the most significant challenges to the property lie in managing the environs of the Tower of London so as to protect its Outstanding Universal Value and setting."

10.152 That there will be harm to these assets would appear to be reflected in the advice of HE, set out in its letter dated 20 September 2024.<sup>128</sup> What is proposed is precisely the type of development which UNESCO has identified as posing a particular concern in relation to the erosion of the OUV of the Tower of London WHS. It will erode the extent to which the Tower dominates its surroundings (which is a key aspect of its significance) and in doing so the legibility of key aspects of its OUV. Indeed, placing within an embassy, i.e. under the control of a foreign state, the building associated with the royal mint will obviously degrade the associational relationship between that building and the Tower of London's historic significance derived from its association with English coinage.

10.153 The inevitable harm from the development will also be especially acute given the nature of the development proposed. Locating an embassy (on the monumental scale of this one) adjacent to a landmark like the Tower

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<sup>128</sup> CD4.08

of London, the significance of which derives in part from the way in which its scale and dominance represents the power of domestic state institutions, and allowing it to be dwarfed by the physical manifestation of overseas diplomatic power in the UK, will erode the significance of that landmark. Its status will be visibly diminished.

10.154 This is an issue the relevance of which has, again, been brought into sharp focus by the events of 8 February 2025. An area of particular concern relates to the potential for protestors to spill over into the area around the Tower Gardens, including adjacent to the bus stop where tour busses drop tourists next to the Tower. Predictably, the demonstration on 8 February 2025 resulted in just such overspill, with police moving protestors to that very area. That plainly impedes access to and enjoyment of the WHS, especially for those with protected characteristics (a factor totally overlooked by the applicant) but obviously of considerable importance, not least given the duty in the Equality Act

10.155 Overall, there is no denying the harm to designated heritage assets this development will cause. Any harm to assets of this level of significance carries substantial weight. Indeed, harm to the OUV of a WHS, such as the ToL, carries the greatest possible weight against the grant of planning permission. That is in addition to the strong statutory presumption against the grant of planning permission pursuant to sections 66(1) and 72 of PLBCAA 1990 which arises as a result of the harm caused to the significance of listed buildings and the conservation area, as well as the conflict with relevant development plan policies including THLP policies 18 S.DH3, S.DH5 and LP policies HC1 and HC2. For this reason alone, planning permission should also be refused.

#### *Conclusion*

10.156 There are, therefore, a number of powerful objections to the grant of planning permission in this case.

10.157 The position in which FOSKD now finds itself is, however, unenviable.

10.158 It has always sought diligently to engage with any proposal for the redevelopment of this site, and it has participated appropriately in the planning process. It has supported acceptable forms of development, for which planning permission was later granted, and it has objected to proposals which are unacceptable.

10.159 It has placed trust in the relevant statutory bodies, like the MPS, and in the democratically elected members of its local planning authority.

10.160 It had hoped the planning regime would function as it should. At first, that appeared to be the case. The SDC resolved to refuse to grant planning permission, twice. The MPS objected, in writing and in person at the SDC meeting. But at the 11th hour, unseen pressure appears to have been brought to bear. Back-room deals have been done. The MPS has performed a U-turn. So has the LBTH. Evidence based decision making and good sense have been left by the wayside, and the result is a proposal for what is so obviously an inappropriate development on this site is set to proceed with little, if any, effective opposition, save for the voices of local residents.

10.161 Local residents know that this proposal will damage the safety and security of those who live in, work in, and visit this area. They know it will seriously impact the highways network at this crucial junction. And they know it will harm the significance of some of the UK's most important heritage assets, including the ToL. The events of 8th February have only demonstrated what FOSKD has always known.

10.162 On any fair appraisal, planning permission for this development should be refused. It is a proposal which does not accord with the development plan read as a whole, and where other material considerations also weigh decisively against the grant of planning permission.

10.163 Regardless of the fact that the MPS and the members of LBTH have been cowed into submission, it is respectfully requested that the Inspector recommends to the SoS that she refuse to grant planning permission.

***Royal Mint Tenants and Residents Association<sup>129</sup>***

*Introduction*

10.164 The TRA are an estate of 153 properties with approximately 400 residents on the east side of Cartwright Street. They are a multi-cultural estate, made up of social housing residents, leaseholders, freeholders and private renters. The estate is owned by LBTH. They have never been consulted by the applicant.

10.165 They live in an area made famous in the Battle of Cable Street, so its of no surprise that they stand against being the forced neighbours of an overseas outpost of repression, which targets people based upon their religion, race, and belief in democracy.

10.166 They have strong concerns about the integrity of the processes in this application, and the appearance that the MPS, who are supposed to be there to protect this community, appear to have changed their position based on the whims of the Government, rather than for any proper objective reason.

10.167 Was this done under pressure from the UK Government? Why were the MPS, who were originally so clear and strident in their opposition to an embassy at this site, so easily persuaded by China's word on security and protests, rather than looking at matters independently? Why did LBTH readily accept the applicant's evidence?

10.168 The Inquiry will have to be careful with the evidence placed before it by the Applicant. Professional witnesses say in their statements that there would be no problems with protests at the site, no risk of closure to the roads, however their evidence has proven to be wrong by the protests that took place on 8 February. All major arteries were closed around the proposed site including Tower Bridge Road and East Smithfield, and a traffic standstill stretched across the East End of London.

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<sup>129</sup> INQ6, 6a and 6b

*Amenity – including traffic and security*

10.169 TRA wish to make clear that whilst they have clear objections to the change of use of the site to an embassy which will result in the Chinese authorities moving into the site, they do not bear a grudge against the Chinese people, who have little say in the behaviour or actions of the Chinese regime.

Applicant's contention that cannot consider the nature of the occupier of the proposed embassy

10.170 The applicant submits that the proposed occupants – the PRC - has no bearing on the decision of this Inquiry.

10.171 The TRA can see why the applicant might want to steer away from this approach, but we submit that for obvious reasons the nature of the applicant is relevant to all aspects that this report will be considering. It touches on a number of relevant factors such as protest, traffic, and safety of the tenants. These matters cannot be discussed in a vacuum. Further, any embassy of this site would be occupied by one of the world's largest countries and therefore would attract protest and security risk and is therefore inappropriate.

10.172 Further, the applicant appears to be using the identity of the applicant to set out what they say are positive aspects to the application. They cannot 'have their cake and eat it.'

10.173 A number of examples of this can be found in their Planning witnesses PoE<sup>130</sup> at paragraphs 3.8-3.10 which talks about the Chinese economy, population in the UK and tourist/visitor markets. Paragraph 3.17 talks about China as a major international partner. Paragraph 11.13 makes reference to PRC as the world's second largest economy, the UK's fifth largest trading partner and the UK Government's stated desire to improve trading and diplomatic links. Substantial weight to be given in the planning balance is cited as the proposed development is of international importance and will enhance London's standing as an international city and support diplomatic and trading relations with the PRC. Other similar references in the applicant's SoC<sup>131</sup> are also given at paragraphs 5.46 and 5.47.

10.174 In terms of amenity, TRA are not against the right to protest, and indeed they took up this right when they turned out to protest against the plan on 8 February with hundreds of other Londoners. However, they are aware that the proposed Chinese Embassy will attract regular protests which will affect their ability to travel to and from their homes as well as the general atmosphere where they live.

10.175 The continuous actions of the PRC against a variety of different groups such as Uyghur, Tibetan, Taiwan, Jimmy Lai and others will ensure that protests against China will continue well into the future.

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<sup>130</sup> CD11.05

<sup>131</sup> CD11.01

### MPS Change of Position

10.176 TRA wish to draw attention to the way in which the MPS have arrived at their conclusion not to oppose the application; the TRA call this the 'Met Police Hokey Cokey' as they appear to change their position on the command of the Government, who themselves seem to be influenced by the PRC.

10.177 Is the change of position, purportedly based on a 2022 pedestrian study the MPS happened to stumbled across, a politically expedient decision influenced by Government pressure or private advocacy from the applicant? The TRA suggests that the operational independence of the MPS is in question.

10.178 The timeline is as follows<sup>132</sup>:

14 October 2024 – Call in of the applications by the SoS.<sup>133</sup>

15 October 2024 – Letter from LBTH Director of Community Safety<sup>134</sup> which notes the residential nature of the surrounding area. This letter also raises concern regarding a significant level of potential protest which in turn may impact adversely on the surrounding strategic road network, arterial roads, residential neighbours, local business community and public space near the ToL and Tower Gardens.

18 November 2024 – the Prime Minister addresses PRC at the G20 meeting in Brazil, referencing the call-in and stating that 'we have to follow the legal processes and timeline.'

14 November 2024 – Letter from Deputy Assistant Commissioner of the MPS<sup>135</sup> citing concerns on the proposed site potentially attracting significant protest activity. The letter also states:

- There is nowhere at the location that would accommodate more than approximately 100 protestors. The rear of the site is almost entirely residential. Any protest would cause serious disruption to the local community.
- In the event that more than 100 protestors attend the location they will either spill into the road or have to move across towards the Tower of London.
- The close proximity of the proposed site to key arterial roads that would be affected by any of these outcomes would have a significant impact.
- An analysis of data held by the MPS MO6 Public Order unit to identify the number of protests that have been held outside the current Chinese Embassy for 2023 and 2024, showed that 47 protests have taken or are due to take place. Of those, 14 protests were planned

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<sup>132</sup> Please note that the document references given in the timeline are all included in INQ6b, however for consistency where these are core documents, the CD references have been given.

<sup>133</sup> CD3.01

<sup>134</sup> CD4.22

<sup>135</sup> CD4.27

with over 100 protestors, 7 of which were planned with 200 protestors or more and a further 7 with between 50 to 100 protestors. This is a significant number of protests with over 100 attendees.

22 November 2024 – Letter from LBTH Housing Management Division<sup>136</sup> which is responsible for overseeing the management of the Royal Mint Estate and associated green space at Royal Mint Green. This letter makes reference to the significant number of gatherings at the existing PRC Embassy and concerns regarding the increased costs of caretaking and maintenance.

9 December 2024 – SDC met to resolve how they would have determined the applications and held that they would have objected on three issues – raised likelihood of terrorist activity, scale of protestor activity and excessive demand on MPS resources that the MPS is not able to resolve. The transcript of the MPS Chief Inspector<sup>137</sup> highlights the concerns of the MPS stated at the SDC including stating that there is nowhere that would accommodate more than 200 protestors and that protesters would likely spill onto the road of a major arterial junction which would have significant impacts and the attractive nature of the site for protestors.

8 January 2025 – MPS reversal of the decision on this date to LBTH in an email from the Head of Estate Strategy and Engagement.<sup>138</sup> This was not communicated to the Planning Inspectorate or to other parties at this time.

12 January 2025 – LBTH issue their revised SoC<sup>139</sup> referencing the change in MPS position on 8 January at paragraphs 5.4-5.6. This calls into question the change of position and the reasons behind it.

14 January 2025 – letter from FCDO and the HO to the Planning Inspectorate<sup>140</sup> which stated that the MPS had removed their objection on the basis of further technical evidence.

This is an example of political pressure being placed on the Planning Inspectorate to recommend the application. The matter had already been called in and the MPS should have communicated their change of stance, rather than the Ministers making that communication.

17 January 2025 – I-Transport Report<sup>141</sup> is produced. The conclusions relating to the extent of likely protest activity is wrongly precepted on the applicant's PCLA.

17 January 2025 – MPS letter from Deputy Senior National Co-Ordinator (Protect and Prepare)<sup>142</sup> which sets out the MPS revised position and

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<sup>136</sup> INQ6b p5

<sup>137</sup> INQ6b p9

<sup>138</sup> See CD9.08, appendix 2 p31

<sup>139</sup> CD9.07

<sup>140</sup> CD12.02

<sup>141</sup> See CD9.08, appendix 3 p33

<sup>142</sup> CD12.01

details regarding the review of the PCLA stating that there is sufficient space for future protests to be accommodated without significantly impacting the adjacent road network. The letter also states that the rear of an embassy is unlikely to be used to protest.

It is unclear why LBTH provided the report and whether the MPS had understood from LBTH that it was not objective evidence but from the applicant's. It is also unclear what pressure was placed on the MPS to ensure there was no objection?

17 January 2025 – LBTH Planning PoE<sup>143</sup> sets out their revised position in light of the MPS withdrawal and I-Transport review at paragraphs 5.12-5.14. The importance of the MPS decision can be seen as it precipitated the change of heart of LBTH.

23 January 2025 – the PCLA dated 7 February 2022 is made publicly available.<sup>144</sup> This document highlights key findings that:

- Larger sized protests of 500-800 people may occur 3-4 times a year at the new embassy.
- Using the Fruin Level of Service the area to the front of the site and East Smithfield can accommodate around 2250-4500 people. The area to the front of the site can accommodate 960-1960 people.

The argument that this document is what led the MPS to change their mind does not appear to be persuasive. No workings have been provided and it is in stark contrast to the MPS previous estimates of the protest capacity at the site. This also brings into question whether there has been political pressure on the MPS to change their stance.

25 January 2025 – Letter from Kevin Hollindrake MP (Shadow Secretary for Levelling Up Housing and Communities) to the Prime Minister.<sup>145</sup> This letter calls into question the propriety of decision making and the evidence before the Inquiry.

7 February 2025 – LBTH Statement on the application.<sup>146</sup> This notes that the SDC substantive reason stands and it will be in front of the Inspector so that she can see what stance the Council would have taken at the Inquiry had the MPS felt able to maintain its objection.

10.179 For the reasons set out above, it is respectfully submitted that the evidence of the MPS that they do not object should be treated with some caution. There is also clear evidence that the evidence on which the MPS made their determination is wrong.

#### The Applicant's Evidence

10.180 The transport witness for the applicant sets out an updated assessment of the PCLA at paragraphs 6.4.8-6.4.11.<sup>147</sup> At 6.4.13 that evidence

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<sup>143</sup> CD9.08

<sup>144</sup> CD1.33

<sup>145</sup> INQ6b p26

<sup>146</sup> See INQ3a for a copy of the statement, PDF page 1

<sup>147</sup> CD11.07

concludes that there would be sufficient space around the perimeter and that the chance of protestors moving onto the carriageway due to insufficient footway space is unlikely. It is also stated that the MPS position aligns with the professional judgment of the witness that there would be sufficient space for protests to be accommodated within the surrounding public realm without significantly impacting the adjacent road network.

10.181 The design witness and planning witness also reiterate similar points.<sup>148</sup> These witnesses are wrong, as has been demonstrated.

#### Submissions on the available evidence

10.182 The protest which took place on 8 February caused all arterial roads to be closed to traffic. There are photos and videos which demonstrate that there is no traffic at all running on roads around the proposed site, including across Tower Bridge and along East Smithfield.<sup>149</sup> The MPS can also confirm this. The heat map<sup>150</sup> shows that not only did traffic stop around the proposed site, but that problems stretched into the surrounding areas of London, up to Whitechapel Road.

10.183 This is important as this is evidence as to the effect of protest at the site and it shows that the applicant's expert evidence, including the pedestrian report, were wrong.

10.184 The evidence of the effect of protest is clear. These effects would fall on the TRA, who would be stuck not being able to access their properties by car, for long periods on a regular basis, and would be beset by traffic problems. The application for a mega embassy, in such a sensitive location, should be refused.

10.185 The claims of the MPS that they don't know how often protests will take place is farcical.

10.186 The nature of the occupants is vital in this regard. Over 300,000 Hong Kongers have escaped the PRC repression which means that protest such as this will be a regular occurrence.

#### Security

10.187 The MPS have failed to consider security. TRA have no confidence that the security of them or their families have been properly considered by anyone in relation to the application.

10.188 The presence of such a high-profile diplomatic mission in a densely populated area obviously creates an increased risk of terrorist attacks and other security threats. Given China's global standing and ongoing political tensions, this embassy will be a prime target for those seeking to cause harm.

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<sup>148</sup> CD 11.03 paragraph 29 and CD11.05 paragraphs 2.29 & 9.4, 9.10-11, 9.19, 9.22-27, 10.13 and 10.36

<sup>149</sup> INQ6a and INQ6b, p32-35

<sup>150</sup> INQ6, page 36

10.189 The TRA submit that, given that the applicant's security witness was able to be so confident, yet provably wrong in relation to protest activity, this causes doubt on his evidence in relation to terrorist incidents occurring in the area. How can the TRA have any faith in what he says about terrorism, especially given the importance of this to them and their families safety?

10.190 Further, the applicant does not properly consider the threat of attacks from within the embassy. This is especially relevant given the attack upon a protestor at the Manchester Consulate, and the dragging of that protestor into the embassy, away from the safety of English law by a group of Chinese diplomats including the consul general.<sup>151</sup> Such incidents demonstrate a disregard for UK laws and the safety of individuals exercising their democratic rights.

10.191 It is submitted that protests, counter-protests, and potential acts of violence will become a regular occurrence, putting bystanders and locals at risk. The suggestion that protestors will not want to protest at the back pedestrian gate is farcical.

10.192 TRA submit that in all the circumstances, the Crilly Report is to be preferred to the evidence of applicant's security witness. The Inquiry may find the fact that the Crilly Report was been produced on a pro bono basis means that it is more compelling.

10.193 Further to the above, the area is not designed for high-security diplomatic premises, and the heightened security measures will only serve to create an oppressive environment for those living nearby. At the protests on 8 February, residents were faced with large number of private security guards around the perimeter of the site creating a distrustful and unpleasant atmosphere.

10.194 Increased surveillance and policing, barriers, and armed personnel create an environment of tension and unease rather than community integration.

10.195 Further, in November 2022 the LBTH own Bomb Blast Assessment for the previous Chinese Embassy application PA/21/01327 said: "... successful blast events in selected locations would result in injuries and deaths to passers-by as well as structural damage and potential building collapse." (London Plan Policies GG6, D11). The full LBTH Blast Assessment has never been released to the public and my clients have grave concerns that this has not been properly considered in the rush to push through the application for political reasons.

10.196 Further, the residents have no faith that the embassy would stick to any planning conditions applied to them given that they have flouted planning law in at their Consulate in Belfast by building the 'Not so Great Wall' of Belfast with no planning permission. This incident involved '*A row over the construction of a wall at the Chinese consulate in Belfast*' whereby an

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<sup>151</sup> INQ6b p41

individual obtained an injunction to prevent unlawful building yet China said it would ignore the legal order to temporarily halt the work.<sup>152</sup>

10.197 A letter from lawyers for the Chinese Embassy in London to residents objecting to the security wall said diplomatic staff did not recognise the jurisdiction of courts in Northern Ireland. The same people in charge of that debacle and refusal to follow the law will be in charge or running the embassy site if permission is granted.

*The Vienna Convention on Diplomatic Relations*

10.198 The Vienna Convention has been cited in the evidence as a material reason why permission should be granted. In particular, articles 28 and 30(1) and 30(2) have been quoted.

10.199 Lee & Quigley, Consular Law and Practice (3rd Edition) at p345 provides that "*local building, zoning and town planning regulations can operate to frustrate the opening or functioning of consulates, If local zoning and other requirements are overridden, a sending State runs the risk of generating hostility from the local community.*"

10.200 Satow's Diplomatic Practice Seventh Edition at page 232 provides that "*For the character of the building as an embassy premises does not exempt it from local building or planning laws.*"

10.201 There seems to be a two-stage process. First, the acquisition and use of the land by a foreign nation is subject to all local planning laws and the foreign nation does not have any special rights nor should special regards be paid to their status. Second is that the SoS should approve the use of the premises as diplomatic premises. It is argued that second part is what should be facilitated by the state and there is no special force in the application by nature of it being an application for use as an embassy.

*Conclusion*

10.202 The TRA, a diverse group of tenants from all religions and backgrounds, are up against powerful opponents:

- a. Their local Council who they thought that would be supporting its residents;
- b. The MPS changing their evidence in a way which can only call into questions their operational independence;
- c. A powerful authoritarian state with huge funds to spend on 'expert evidence'; and,
- d. Their own Government which appears to be acting for their own political purposes and paying no heed to what the people want, The residents who have to live next door to an instrument of oppression which will affect their lives every day.

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<sup>152</sup> INQ6b p42

10.203 TRA are left with the Inspector to properly scrutinise the evidence which is especially important given that the applicant's witnesses' evidence has been proven to be wrong by the protest on 8 February. Further, consideration as to whether the MPS is behaving independently in this process should be given. Their initial strong statement at the SDC, followed by a complete retreat from that position based on the applicant's evidence, gives rise to concern. Their new position, 'well maybe we were wrong about protests but they won't happen often' is farcical.

10.204 The applicant will have heard the representations from all of the neighbouring resident's groups. Their positions are quite clear.

10.205 There are many locations in London which can properly host a mega embassy. The Royal Mint Court is not the rights site, and the Inspector is invited to refuse to recommend the application to the SoS.

### ***HongKongers in Britain<sup>153</sup>***

10.206 The proposed relocation of the Chinese Embassy to Royal Mint Court is an unacceptable planning decision that threatens public safety, strains local infrastructure, and undermines fundamental democratic freedoms. This historic and central London site will inevitably become a flashpoint for large-scale protests against CCPs human rights abuses, creating ongoing crises in policing, traffic management, and community stability.

#### *A Site of Constant Protest and Unrest*

10.207 This is not a hypothetical concern; it is an inevitability. London has long been a battleground for demonstrations against the CCPs oppression. If this embassy is approved, Royal Mint Court will become the epicentre of protests on a monthly, if not weekly-basis, leading to continuous disruption for local residents and businesses.

10.208 Deploying a full force of police officers to control thousands of protesters at an explosive site like this should not be used to justify rolling out the red carpet for autocracy into an excessively grand palace. The restricted protest space has already put both police and protesters at risk. More disturbingly, it threatens the UK's reputation as a safe haven for those fleeing political persecution.

10.209 Protesters should not be forced into an impossible position where, in order to resist the growing foothold of autocracy, they must first "win over" UK law enforcement. Such a scenario would send an alarming and chilling message to the world, that human rights defenders now find themselves at odds with the UK police and government. This is the last thing protesters want. Many are political refugees or holders of British National (Overseas) visas, and for them, the stakes are even higher. If arrested, they lack the same legal protections as British citizens and could face deportation back to Hong Kong or China, where they would be at risk of severe political retaliation.

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<sup>153</sup> INQ7

10.210 Rather than prioritising short-term diplomatic convenience, planning authorities must consider the long-term damage this decision could inflict on the integrity of UK democracy and national security.

10.211 At the protest against the plan on 8 February, a MPS representative confirmed that 3,000 protesters attended. The event resulted in two arrests, one person falling unwell, and a major central London junction being blocked by police. Given the high likelihood of frequent protests and rallies in the future, how much disruption, noise, and public backlash will this cause? What will be the economic impact of inevitable gridlock? The consequences are glaringly obvious.

*A fatally flawed traffic and security plan*

10.212 The traffic assessment used to justify this embassy (the PCLA), funded by the Chinese authorities and submitted to the MPS, has been exposed as deeply flawed. Initially, the MPS opposed the plan, citing the limited protest space and the immense strain on their capacity to manage demonstrations. However, after receiving the PCLA, funded by the Chinese government, the police made an abrupt U-turn, withdrawing their objection. This sudden reversal raises serious concerns about the integrity and reliability of the decision-making process.

10.213 The risks are undeniable:

- Severe traffic congestion at an already overburdened junction.
- Emergency access issues that could endanger lives.
- A permanent drain on local policing, diverting resources away from crime prevention and public safety.

10.214 The fact that the MPS reversed their stance after reviewing a CCP funded report exposes a deeply problematic planning process. The Planning Inspectorate must reject this flawed assessment and recognise the overwhelming security risks posed by this proposal.

10.215 The MPS initially cited low protest data outside the incumbent Chinese Embassy as a justification for their assessment. However, this analysis failed to account for the increasing pattern and scale of future demonstrations, particularly as the number of exiled communities, especially from Hong Kong, continues to grow due to escalating authoritarian aggression both domestically and overseas.

10.216 Additionally, the police report and statement overlooked large-scale protests against the Chinese authorities that have taken place in other key locations, such as Parliament Square and Trafalgar Square, further underestimating the frequency and magnitude of opposition that will inevitably arise outside the proposed embassy at Royal Mint Court.

*Planning Hearings and the silencing of human rights concerns*

10.217 Planning hearings follow a strict "no politics" impartiality rule, which often means that human rights perspectives are ignored or silenced. The moment we mention China, or even the Chinese state, we risk being labelled as biased, political, one-sided, or even discriminatory. But let me be clear: we stand for human rights universally, including the rights of

Chinese people, which is why we stand against the state's oppression of them.

10.218 The assertion that we can separate the embassy development from China itself is unapplicable, especially when it is evident that China has imposed diplomatic pressure to push for government approval. This issue is fundamentally about the Chinese state, and that is precisely why this site is inadequate. The scale of protests that will inevitably take place, as well as the security concerns that have been raised, are a direct consequence of the regime seeking to establish this embassy in London.

*A human rights risk for protestors and dissidents in the UK*

10.219 This embassy will not simply serve as an administrative centre, it will be an extension of China's authoritarian reach into Britain. There is mounting evidence that Chinese diplomatic outposts are used for:

- Surveillance and intimidation of exiled activists.  
Hongkongers, Tibetans, Uyghurs, and Chinese dissidents in the UK already face harassment, surveillance, and threats from pro-Beijing agents. A massive embassy presence will intensify their vulnerability.
- Transnational repression.  
China has been accused of operating illegal "overseas police stations" to silence political opponents and even force them back to China. Approving this embassy risks legitimizing and enabling such activities on British soil.
- Censorship and influence operations.  
The CCP has a record of pressuring businesses, universities, and institutions to align with its interests. A large diplomatic hub in London could further embolden efforts to control narratives and suppress open debate.

10.220 The UK has a duty to protect those who sought refuge here from persecution. Approving this embassy would send a dangerous message: that economic ties with China take precedence over human rights and democracy.

*A question of national values*

10.221 This is not just a planning decision; it is about Britain's moral and political stance.

- The UK has sanctioned Chinese officials over human rights abuses in Xinjiang.
- Parliament has recognised the atrocities against Uyghurs as genocide.
- British courts (and the HO) have ruled in favour of Hongkongers fleeing persecution.

10.222 How can these actions with approving a grand diplomatic fortress for the very regime responsible be reconciled? Rejecting this embassy is not just

a local planning issue, it is a moral stand. Britain must not roll out the red carpet for a government that suppresses free speech, crushes dissent and commits human rights violations on a massive scale.

10.223 Hongkongers in Britain protest because there is no choice, because other voices are silenced, imprisoned, disappeared. Banners and candles are carried because in China to do so is to risk everything.

10.224 The UK government is being asked to approve a fortress of oppression at Royal Mint Court, a towering embassy for a regime that has built concentration camps for Uyghurs, erased Tibetan culture, crushed Hong Kong's freedoms, and massacred students in Tiananmen Square. Its presence would serve as a chilling reminder to every exiled activist, every refugee, every survivor of persecution—that even here, in Britain, China's power looms over them.

10.225 The CCP does not stop at its borders. This embassy will not just be an office of diplomacy—it will be a centre of surveillance, intimidation, and control. Every time there is a protest against China's human rights abuses, protestors face harassment. If this embassy is approved, protestors will be there—again and again, month after month, year after year.

#### *Conclusion*

10.226 The relocation of the Chinese Embassy to Royal Mint Court poses an unacceptable risk to public safety, democratic freedoms, and the UK's commitment to human rights. This deeply flawed proposal should be rejected. The cost, both in human rights and public safety, is far too high.

#### ***Cllr Peter Golds CBE***

10.227 Councillor Peter Golds has served on Tower Hamlets Council since May 2006. I object to this application which has twice been rejected by LBTH after extensive consultation and deliberation.

10.228 The application is for what will be the largest embassy building in any country in Europe. This has twice been considered by LBTH and on both occasions was rejected by members, the second occasion being 9 December 2024.

10.229 Significantly, the application remained unchanged at both applications with the applicant claiming, on the second occasion, that there was no merit in the initial rejection. If that be their view, then why did they not appeal a decision which they regarded as having no merit rather than wait almost two years to resubmit the same application and then rely on a controversial government call in with regard to the second, unchanged, application. Following the rejection of the first application, neither the Mayor of London or the government sought to call in the application.

10.230 After consultation and discussion within the Borough and indeed beyond, as this application has national implications, the application was unanimously rejected by the SDC for the reasons cited. In particular, the strain on local police resources was explained in detail by the MPS to the SDC.

10.231 Importantly in a statement issued by LBTH on the 7 February 2025, it reiterated that it stood by the objections of the committee, minus that which had been withdrawn by the police.

*The site*

10.232 The local, regional and national implications of this application are enormous. The LP refers to "embassy sites" as does the THLP. However, this is far more than an embassy as it includes an official residence for the ambassador and many residential properties for embassy employees. As this is located adjoining an iconic WHS, then this surely requires very serious consideration.

10.233 The location is truly historic. It includes the foundations of the Abbey of our Lady of the Grace's, built between 1348-50, and uniquely is the only Cistercian religious house built in an urban area. It was founded by King Edward III and the transept was built across a number of plague pits where many who died in the black death are interred. Arial photographs show how extensive the foundations of the Abbey remain.

10.234 Following the dissolution of the Monastery in 1538 the main buildings were gradually demolished, although extensive and well preserved foundations remain. Between 1805-1809 a new building to house the Royal Mint was erected and remains today. The Mint itself was re-located although the main building was still in use by the Royal Mint until 2000, after which it was sold in increasingly controversial circumstances to a number of buyers. The 1809 Johnson Smirke building , which is a classic Regency construction remains and is listed. It could and should be complementary to the ToL and London Bridge as part of the WHS.

10.235 The LP itself is clear that any development proposals in WHS and their settings, including buffer zones, should conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. This application, to locate a controversial development on the remains of a 776-year-old historic monastery adjoining the ToL and Tower Bridge, scarcely enhances OUV.

10.236 The proposed visitor centre within the complex, will show just a tiny section of the foundations. Watching the Olympics on the streets and historic locations of Paris this summer just shows how damaging this application could be. No French government would permit a building of this size this on or near any of their heritage sites.

10.237 UNESCO have commissioned a report on the ToL last year to be debated this year. This will examine the setting of the Tower. It would be little short of catastrophic for London, were the Tower to be downgraded because of an ill-suited development proposal.

10.238 Significantly, HRP submitted a letter regarding this application expressing concerns regarding security and safety. As the application is unamended one can also add the reservations of HE which were included in the rejected application.

*Traffic and Communication*

10.239 Between London and Dartford Bridges, there are just three crossings of the Thames: Tower Bridge and the Rotherhithe and Blackwall tunnels. A new tunnel is to be opened in May 2025. The closure of any of them can and does cause gridlock potentially affecting tens of thousands of people, north and south of the River Thames. To the front of the development site is Tower Bridge Approach, to its south is East Smithfield, leading to the Limehouse Link and both the Rotherhithe and Blackwall tunnels.

10.240 On the 28 August 2024 a fire in the southbound Blackwall tunnel in the late afternoon caused a massive gridlock on both sides of the river which resulted in traffic jams lasting until midnight. I was caught up in this for hours. On Tuesday the 10 September 2024 an incident in the Rotherhithe tunnel again caused jams on both sides of the river. Both of these incidents received press coverage.

10.241 An embassy will attract controversy and there is little in the original or the current application to indicate how demonstrations on these vital roads will be handled by the MPS and other relevant authorities. The MPS state that demonstrators can be contained by moving them from the front of the location to East Smithfield. In fact demonstrators will congregate at the front of the building.

10.242 At the SDC meeting the MPS indicated that they had been involved in embassy demonstrations since October 2023. In particular these are the embassies of Israel, America and Egypt. The policing costs have been enormous, these demonstrations adding £41million to London's policing bill. These demonstrations involving embassy locations over the past year have shown how London streets and indeed the local economy is vulnerable to such events.

10.243 On 8 February a demonstration was held at Royal Mint Street, in front of the proposed embassy. It resulted in Tower Bridge, East Smithfield, Tower Bridge Approach, Lower Thames Street and other City approaches being closed by order of the police. There was again gridlock on both sides of the river. Were this application to succeed it is likely that closures on this scale would be a regular occurrence, affecting the economy of the city and visitors to the Tower as well as residents in east and south east London. The American Embassy is located at Battersea and demonstrations do not affect anything like as wide an area as this proposed location.

10.244 I attended the protest and on arrival via DLR, walking along Cable Street and then through the Royal Mint Estate to East Smithfield, police cars and vans were stacked up.

*Security*

10.245 When the application was considered in 2022, speakers referred to security cameras, surveillance of people and the protection of people. Aside from crash barriers there were no significant reports or explanation as to this problem.

10.246 In 2024 detailed evidence was given to the SDC by dissidents as to the regularity of demonstrations at the current embassy and at other locations relating to the Chinese Government.

10.247 These will be transferred to Tower Hill, with the consolidation of the Chinese Government and the Chinese Communist Party to a single venue with the potential for continual disruption.

*Local people*

10.248 Residents of St Mary Grace's Court expressed concerns regarding the overwhelming density of the housing attached to the application and their concerns as to discover that the Chinese Government had become their ground landlord.

10.249 There is a real issue for residents on the Royal Mint and Peabody estate which is social housing who were not consulted because the consultation boundary is on the border of their estate. They have concerns regarding traffic and security which would affect their lives. 40% of Tower Hamlets residents follow the Muslim faith and these nearby estates have many Muslim residents of Bangladeshi origin, a number of whom have fled oppressive governments in that country. They are deeply worried of surveillance by the embassy. They are concerned at being captured on security cameras which will surround the site.

10.250 There are letters from residents of St Katharine's Dock expressing their concerns at the implications of this application.

10.251 Other local groups which work to protect this extraordinary area as a precious asset for London have not been consulted and have concerns about the wider implications of this application. Again, these are not covered in detail in the application or report.

10.252 The consultation exercise, managed by agents for the most recent application was unusual to say the least as those wishing to attend had to submit personal details, via a QR code and then complete a form of application which required proof of identity such as passport or driving licence. Unsurprisingly few people were prepared to hand the Chinese government such information and equally unsurprisingly, just a handful attended.

*Government intervention*

10.253 The extraordinary withdrawal of the police objection, following a discussion between the Prime Minister and the Chinese President which was overheard by journalists resulting in an intervention by the Foreign and Home SoS is unprecedented. The result is the police being publicly seen to be in a "hokey cokey" situation of changing their mind. Furthermore, the "evidence" for this withdrawal is based on a survey produced by consultants commissioned by the applicant and being part of the planning bundle for the first application. Called the PCLA, this was available to the MPS in 2022, before representations were made by the MPS at the SDC in December 2024 and only appeared after the ministerial interventions, resulting in a complete about turn by the MPS.

10.254 This survey was proved to be completely wrong by the demonstration last weekend. The original concerns raised by the MPS must stand – not least as they have the evidence of their own management of the demonstration held last weekend which contradicts the applicant's survey.

10.255 LBTH is a remarkable Borough with an amazing population who in their diversity get on well. At the SDC a strict three minute limit on speeches is enforced and speaker numbers limited. The chair of the St Katharine's Docks Group abandoned her speech and delivered a speech prepared by the social housing Royal Mint Tenants, who had not been permitted to speak.

10.256 For these reasons, this application should be opposed.

***Peiqing Ni<sup>154</sup>***

10.257 Peiqing Ni is a resident of Tower Hamlets. He raised serious objections to the proposed Chinese Embassy at Royal Mint Court as both a local resident and as the executive director of the China Dissent Network (CDN).

10.258 The CDN is a London-based Chinese diaspora organization dedicated to amplifying dissenting voices against China's authoritarian regime. CDN is committed to creating a "safe space"—a crucial concept in our work—where those persecuted by the CCP can freely express their views, seek refuge from surveillance and intimidation, and build solidarity without fear of reprisal.

10.259 For Chinese, Hong Kong, Tibetan, Uyghur, and Taiwanese dissidents in the UK, a "safe space" is not just physical—it is the ability to exist without fear of being followed, harassed, or silenced by agents of the regime they oppose.

10.260 The proposed Chinese Embassy threatens to erase that space by turning Tower Hamlets into a hotspot for surveillance, repression, and fear.

10.261 There are four key reasons why this application must be rejected:

**1. Royal Mint Court is Not a Safe or Suitable Site for Large-Scale Protests**

10.262 As other speakers have outlined, the 8 February protest provided real-world evidence that Royal Mint Court is unsuitable for large-scale demonstrations.

10.263 Protests at Chinese embassies are frequent and inevitable and they are not one-off events. The CDN have organised several protests outside of Chinese Embassy over the past 2 years, ranging from hundreds to thousands, and this is Chinese diaspora alone.

10.264 Past protests in London alone include:

4 June 2021 – 1,000+ protesters for Tiananmen Square Massacre anniversary.

1 October 2020 – Hundreds protesting against China's crackdown on Hong Kong.

16 October 2022 – A major protest following a Hong Kong activist being assaulted by Chinese consulate staff in Manchester.

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<sup>154</sup> INQ9

10.265 On 8 February 2025, we estimate that around 4,000 people gathered at Royal Mint Court, forcing police to shut down roads and reroute traffic.

10.266 The MPS had to make real-time changes to their policing plan, and additional officers from City of London Police were called in, proving the area is completely inadequate for handling protests of this scale.

10.267 If this embassy is approved, these demonstrations will not stop—they will become more frequent and more disruptive, further straining local resources.

## 2. Personal Evidence of Surveillance and Transnational Repression

10.268 Beyond logistical concerns, this proposal raises serious questions about freedom of speech, safety, and the Chinese government's intimidation tactics.

10.269 Peiging Ni personally attested to this having been followed after attending the Urumqi Fire protest outside the Chinese Embassy in London, in 2022.

10.270 Many dissidents, activists, and journalists have reported being watched, followed, or harassed after speaking out against the CCP—not just in China, but also in the UK.

## 3. Permanent Security Burden and Strain on Public Resources

10.271 The extensive policing challenges this proposal would create are summarised as follows:

- The MPS would need to create an entirely new security framework—one that is constantly reactive, rather than proactive.
- Unlike Whitehall, Westminster, or Kensington, where embassies are clustered together, this embassy would be an isolated diplomatic stronghold, requiring separate, specialised policing efforts.
- Protests will be regular and unpredictable, requiring a dedicated police unit for diplomatic security and constant road traffic management for emergency response and security protocols.
- A permanent police presence outside the embassy.

10.272 This is not sustainable in the long term. If approved, this will be an ongoing security crisis, not just a temporary challenge.

## 4. Approving this site contradicts the UK's commitment to human rights

10.273 As already detailed, the Chinese government has been widely condemned for human rights issues.

10.274 There have been several crackdowns on Chinese dissents. Over the past two years, we have seen an unprecedented wave of resistance against China's authoritarianism, led by ordinary citizens, young people, and activists who refuse to remain silent. These movements have been met with violent suppression, and this embassy would serve as an extension of that repression on UK soil.

10.275 The Urumqi Fire & Zero-COVID Uprising in 2022 shook the country. For the first time in decades, a generation raised under censorship began questioning the system.

10.276 What message does approval send?

- That the UK tolerates transnational repression on British soil?
- That a government accused of genocide and human rights violations can build its largest overseas diplomatic base in London?
- That local residents and human rights defenders can be ignored in favour of economic diplomacy?

10.277 The UK has sanctioned Chinese officials for human rights abuses—yet this proposal would reward the same regime with a prime London site.

10.278 This Inquiry must not allow repression to take root in Tower Hamlets.

*This Inquiry must reject the embassy proposal*

10.279 This is a planning decision with long-term consequences. If approved, this site will become:

- A permanent security flashpoint.
- A drain on local policing resources.
- A source of regular, large-scale disruption for residents.
- A diplomatic stronghold for a government engaged in human rights abuses and transnational repression.

10.280 This is not just about diplomatic relations—it is about what Tower Hamlets stands for. On 15 March, we will return to protest once again. This is not the last time this issue will be raised.

*Conclusion*

10.281 Please consider the evidence. This embassy is a risk to public safety, a burden on policing, and an unacceptable disruption to local life.

10.282 For these reasons, the Inquiry is asked to reject the planning application.

***Kit Chan<sup>155</sup>***

10.283 Kit Chan spoke on behalf of fellow Wapping residents to object to the planning application for the new Chinese Embassy at the Royal Mint Site.

10.284 Kit Chan has lived Wapping for over 25 years and worked in the City of London for the same length of time. The Ward of St Katharine's and Wapping has a population of approximately 10,000-11,000 residents, though no separate census data exists for Wapping alone. Wapping is a strong local community. The community does not have the resources to pay for a barrister to represent us and all the changes are difficult to keep up with. The community care passionately about the local area which compared to other areas in the Borough, is considered to be a relatively safe place to live, although it does have some crime and anti-social behaviour to deal with.

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<sup>155</sup> INQ15, INQ15a and INQ15b

10.285 Second, despite repeated assurances that this is purely a planning matter, residents are deeply troubled by evidence of political interference. The Prime Minister's decision to call in the application followed a conversation with President Xi. The SoS subsequently called in the application. This coincided with the Foreign Secretary's visit to Beijing, timing that raises serious concerns about political motivation.

10.286 Of particular note is the intervention regarding the MPS original objections which had detailed significant policing and security concerns about the Royal Mint site becoming the new Chinese Embassy. However, the FCDO/HO, not the MPS themselves, wrote to the Planning Inspectorate to advise of the withdrawal of their objection. That this occurred immediately after the Chancellor's visit to Beijing strongly suggests inappropriate political influence.

10.287 The applicant's position further reinforces these concerns, as they have explicitly stated they would not resubmit the application without government guarantees of approval. This unprecedented condition appears to bypass normal planning procedures.

10.288 Third, upon reviewing the LBTHs Statement of 7th February on their website, there remains uncertainty around its implications. It has been impossible to locate any documentation on the planning portal indicating whether the Councillors who voted to object to the Application on 9 December were consulted about the Council's apparent change in position.

10.289 Furthermore, we cannot understand why the Council has withdrawn its objections that were raised during the SDC meeting, which extended beyond the Police's concerns and included:

- Adverse impacts on the heritage assets
- Adverse impacts on tourism
- Adverse impacts on residents
- Concerns over the effects of potential protests, acts of terrorism and related security mitigation measures on highway and pedestrian safety
- Contravenes THLP Policies S.TR1, D.TR2, D.TR4, and LP policies T1, T2, T4.

10.290 LBTH Statement of 7 February does say that these reasons still stand, despite the decision of the Police to withdraw their objection.

10.291 Fourth, it is unclear where the MPS stand after reading the MPS letter of 17 January. How could the MPS have a proper plan in place about whether they can deal with demonstrations which may be held at the site on the basis of that letter when they don't know how large the demonstrations will be? It leaves residents fearing that things could get out of hand.

10.292 Fifth, over the years, the steadily worsening traffic and the increasing gridlocks in and around the City of London including the main arterial roads leading into the city have been witnessed. Already, tradespeople from areas as near as Islington decline work in Wapping due to access difficulties. The regular demonstrations at an embassy at the Royal Mint

site would exacerbate these problems, affecting not only residents but also commuters from East London.

10.293 Sixth, Wapping's unique geography makes it particularly vulnerable to disruption from events along The Highway/East Smithfield corridor. The Highway (A1203) transitions into East Smithfield as one approaches Royal Mint Court.

10.294 Bordered by the River Thames in the south and the north by the Highway/East Smithfield, our community is regularly landlocked during sporting events such as the London Marathon, the Big Half, the Triathlon and Ride London. The situation is exacerbated by the lack of step-free access at Wapping Station and the absence of Thames Clipper piers between Tower Bridge and Canary Wharf. These particularly impact disabled residents, elderly people and parents with prams.

10.295 The area hosts three nurseries, two primary schools, one secondary school and a children's activity centre. The secondary school borders The Highway, situated at the junction of East Smithfield and Vaughan Way. The location is marked on the map provided. With The Highway/East Smithfield providing the sole vehicular access route out of Wapping, any embassy related demonstrations would severely compromise access to and from the area, potentially creating gridlock and endangering residents.

10.296 Seventh, the security concerns are profound. The extensive network of sensitive communication cables beneath the site, linking the City of London and Canary Wharf, and indeed residential homes, makes this location particularly sensitive. The findings of the Crilly Report are deeply alarming. While Wapping may not be in immediate proximity to the site, any major security incident there would have far reaching consequences for the entire community.

10.297 Eighth, this prestigious 5.4 acre site, adjacent to the City of London, Grade I listed Tower Bridge and UNESCO World Heritage Site of ToL, is inappropriate for any embassy, particularly of this scale. While we respect the Vienna Convention on Diplomatic Relations 1961, its provisions would effectively grant exclusive access to this significant historical site to the embassy, denying the public access, except by invitation. Also it is not believed that the Vienna Convention requires the UK Government to deliver exactly what the applicant wants, if despite its best efforts, such as the difficulty of policing protests, make it impossible to do so.

10.298 Ninth, it is a struggle to identify any local benefits from this development. It will cause immense harm to the residents and the area, caused by increased traffic, regular demonstrations thereby exacerbating security concerns. This development risks will deter tourists, negatively impacting local businesses reliant on the tourist trade.

10.299 Tenth, it must be emphasised that our opposition is not directed at Chinese people, and the East End has a proud history of welcoming diverse communities. Rather, this location is simply unsuitable for an embassy.

10.300 Finally, as residents who live, work, raise families and retire here, the right to peaceful enjoyment of homes and the neighbourhood should not be sacrificed for political expediency. For these reasons the rejection of this application is recommended.

***Andy Ng Siu-hong<sup>156</sup>***

10.301 Andy Ng Siu-hong is a former District Councillor in Hong Kong and currently UK local Borough Councillor from Liberal Democrats and also a Hong Kong activist. While the Liberal Democrats spokesperson also opposes the 'super embassy,' he spoke to represent himself.

10.302 On 8 February, many thousands of Hong Kongers and other people who opposed the super embassy peacefully protested outside the site. Soon, the space became insufficient, and people had to stand on the road. The police first eased the blockade and stopped the cars for us, but as more people arrived, the MPS attempted to limit the expansion of our standing area, and the tension started to escalate.

10.303 In the end, Tower Bridge was completely blocked, causing major traffic disruptions at the iconic site. Many protesters fell down due to police pushing and the chaotic situation. Two protesters were arrested and the situation was tense.

10.304 The protest space is simply not enough. The report is wrong. Many people believe that the Arup report, which the police rely on, is wrong. The report is incorrect in claiming that the space is sufficient. Arup, who were behind the report, has many projects related to the Chinese and Hong Kong governments. Is the report truly objective, and is there a conflict of interest? Should the MPS really be relying on this report?

10.305 The scale of protests will continue to grow in the future because tens of thousands of Hong Kong people move to the UK every year. Hong Kongers are very active in protests to preserve the values of freedom, human rights and democracy. The Hong Kong people and politicians who are imprisoned in Hong Kong for democracy will not be forgotten, and protestors here speak for those who can no longer protest under the Hong Kong national security law.

10.306 The Hong Kong national security law restricts anyone in the world. Even if you went to the 4 June rally in the UK, you may be arrested if you go to Hong Kong later.

10.307 Because of this, the number of people showing up this time is just the beginning. Some Hong Kongers are afraid of the Hong Kong national security law and worry about being arrested if they visit Hong Kong, especially when their family members haven't all left yet. However, in the coming years, more Hong Kongers will come over and even more will join the protests.

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<sup>156</sup> INQ16

10.308 Unless China becomes a democratic country and respects the will of the people, Hong Kongers will continue to protest more and in larger numbers.

10.309 Regarding the residential area, reports may not have fully considered the impact of such large-scale protests. Police cars were deployed about a 15-minute walk from the protest location, and the atmosphere was tense. Some police officers or security personnel even shouted at people passing near the residential area.

10.310 Protesters arrive from areas near London, such as Reading and Wokingham. Many may drive and park for the protests, which could lead to parking issues and increased congestion, affecting local residents.

10.311 Why does China need such large-scale development, including a tunnel, buildings, and other facilities? Are there any restrictions imposed by our authorities? Would it still be acceptable if an additional million square feet of floor space were added, given that it functions as an embassy with diplomatic privileges?

10.312 The Hong Kong government has constantly emphasized that it will take action against those who violate the Hong Kong national security law, whether overseas or in Hong Kong. Will this super embassy assist in enforcing China or Hong Kong's national security law investigations in the UK? Will it collect information of Hong Kong people who oppose the CCP in the UK? How many Chinese armed personnel will be stationed in this super embassy? How many external CCTV cameras does this embassy have to monitor public spaces, and what is their coverage? Does it have a facial recognition function similar to those commonly used in Muslim-populated areas in Xinjiang? If so, would our authorities approve of such a system being used in London?

10.313 There are many more reasons to oppose the plan, including concerns about national security and the relationship with China. However, it is understood that the focus of this Inquiry is mainly on planning issues.

10.314 This Inquiry is special. On the opening day of the Inquiry, many residents were unable to get in. Some elderly residents, who have lived here for most of their lives, waited a long time in 3°C weather just to express their concerns about their own community, unable to get in. Some people suspect that many Chinese people in the queue were organized, and a news report even discovered that some of the people communicated through a 'February 11 activity group' in a communication app. Many support letters and speakers were from employees of state-owned Chinese companies. This would not be a surprise. As a current UK local councillor, it is my duty to point this out. Would this be acceptable here? Would it be misleading about public support?

10.315 Regarding the site visit, it should not be limited to a quiet Wednesday morning with the embassy's representative. The Hong Kong people will hold another rally against the embassy at this location on 15 March.

10.316 The Inspector should witness the situation to truly understand this important issue. This will allow an understanding of how challenging it is to maintain comfort and safety for the many thousands of people present,

including protesters, journalists, and police, in such an unsuitable area. The impact on traffic in the surrounding area can also be observed.

10.317 No matter where you come from, no matter what language you speak, no matter what colour of your skin, we all enjoy freedom in this country. Freedom of protest is an important element in a free society. Freedom of protest includes providing reasonable space for protest.

10.318 This area simply does not meet the demand. The report may not only affect simple planning, the report may affect how much chaos may happen in the heart of our capital. It affects how many protesters standing for British values may be arrested, and how many police officers carrying out their duty may be injured.

10.319 Please accept the fact that thousands of people spoke on 8 February at the protests. This place simply does not provide enough space for protests. Lastly, because the protest area is insufficient. Because the interests of residents' matter. Because of the values of freedom, human rights, and democracy of this great country. Because this place is home. The Inspector and SoS must say no to this application.

### **Supporters of the proposals**

#### ***Vivienne Xu<sup>157</sup>***

10.320 Vivienne Xu has lived in London for almost 30 years, half of which within LBTH. The streets of Tower Hamlets are considered to have developed into one of the most diverse and dynamic demographics in the UK.

10.321 Despite over 69% of this Borough's population belongs to an ethnic minority group, only 3.2% are Chinese residents. In contrary to what has been suggested by the opposition, the voice of Chinese people who live in LBTH is relatively small.

#### *Political attacks from the opposition*

10.322 The opposition have iterated so many theories, presumptions, self-acclaimed analysis on the intricacies of politics between China and the UK. Unfortunately, the opposition have deliberately steered the discussion into political attacks.

10.323 There is no factual basis to indicate that the Chinese Government will carry out the so-called 'suppression', 'surveillance' and 'persecution' in the UK by simply relocating an embassy. Throughout their time here, the Chinese Government has respected laws and regulations. China and the UK have comfortably maintained friendly cooperation under a healthy diplomatic framework for decades. Despite differences, both sides have remained mature in their exchanges. Such matters should not be iterated during a discussion revolving around the symbol of diplomacy.

10.324 We are residents who care about our community and we care less on who plays politics, but more on how our everyday lives will be affected by this decision.

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<sup>157</sup> INQ17

### *Local problems*

10.325 Many of the concerns raised regarding the actual planning, security, traffic, and other issues are not unique to Tower Hamlets and would most likely apply regardless of where the embassy is relocated. These concerns, while valid, often shift the focus away from the fundamentals. Change itself should never be an issue, a new embassy coming to a fast-developing Borough in one of the most international global hubs in the world should not be an issue. We should be asking ourselves how we can improve our systems to effectively address these issues.

10.326 Traffic is awful everywhere in London, no matter where you go, a new embassy will not bring any more traffic to the area, which can be for many reasons, such as tunnel closures.

10.327 Security challenges also exist across London, not just in Tower Hamlets. The American Embassy transformed the area, attracting investment and increasing property values. A similar effect could happen here.

10.328 Protests do not happen every day. Boycotts do not happen every day. Hopefully an embassy would reduce general criminal activity in the area. Protection of heritage does not come from rejecting renovation projects.

10.329 Keeping an embassy away is hardly a solution to any inherent problems.

### *Supporting Arguments*

#### Social Cohesion

10.330 The embassy will play a pivotal role in enhancing social cohesion within LBTH. Embassies are symbols of exchange and inclusivity. An embassy of whatever country will help to bridge divides and create a sense of belonging for residents of all backgrounds – small or large, superpower or not. Through engaging with local leaders, organising community outreach programs, and supporting inclusive initiatives, the embassy will contribute to stronger, more connected communities. In an area as diverse as LBTH the embassy will bring together individuals from various cultural, ethnic, and socio-economic backgrounds, creating a shared sense of purpose and unity.

#### Strengthening Society

10.331 All embassies bring enhanced security infrastructure, which can be beneficial for the local area. LBTH is a poor area. The enhanced perimeter security, reinforced surveillance systems, security personnel, emergency shelters, potential public awareness campaigns and even collaboration with local authorities may all indirectly contribute to improving safety for our surrounding communities.

#### Economic Growth

10.332 Hosting the Chinese Embassy in LBTH also presents a significant opportunity for economic advancement. A major diplomatic presence of this scale will most likely elevate the Borough's profile and attract new investments. Through major events hosted by the embassy – including high-profile receptions, cultural exhibitions, business forums and many

more, the Borough will have the opportunity to welcome an influx of high-profile visitors, delegations, and business leaders.

10.333 The presence of a major embassy is often a magnet for real estate interest, as diplomatic missions typically stimulate demand for high-quality office spaces, residential properties, and commercial developments. As businesses, NGOs, and other diplomatic entities seek proximity to the embassy, property values in the surrounding areas could very well see a notable rise in value. This could also encourage infrastructure improvements and urban renewal projects, further enhancing the Borough's appeal to investors and residents.

10.334 Multinational corporations, international organisations, and financial institutions could also be drawn here through the opportunity to engage in diplomatic and economic activities with China. Law firms, trade consultancies, and advisory firms specialising in international relations may also gravitate toward the Borough, increasing its reputation as a global business hub. This influx of professional services could lead to job creation and economic diversification, strengthening the local economy.

10.335 With diplomats, government officials, business leaders, and international visitors attending events and meetings at the embassy, local businesses also stand to gain significantly. Hotels, restaurants, conference centres, and retail establishments will benefit from increased foot traffic, driving demand for hospitality and entertainment services. Luxury brands and high-end retailers may also be incentivized to establish a presence in the area, catering to visiting dignitaries and business executives.

10.336 By welcoming the Chinese Embassy, LBTH has the opportunity to harness these economic benefits, solidifying its status as a prominent diplomatic, business, and cultural hub on the global stage. The long-term impact could lead to sustained economic growth, increased employment opportunities, and a more vibrant and prosperous community.

#### *Conclusion*

10.337 The proposals are more than just a strategic decision— they are an opportunity for LBTH to grow stronger and build lasting connections among the hundreds of ethnic communities that have long taken root here.

10.338 The application is supported, as is a future where LBTH continues to grow as a place that welcomes opportunity, security, and cultural vibrancy.

#### **Zugang Long<sup>158</sup>**

10.339 LBTH stands at a pivotal moment in its development. The planned relocation of the Chinese Embassy to Royal Mint Court presents a unique opportunity to drive forward urban renewal, enhance local infrastructure, and strengthen the Borough's economic potential.

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<sup>158</sup> INQ18

*Protecting and preserving cultural heritage*

10.340 A key concern that has been raised is the potential impact of this relocation on the historic character of Royal Mint Court and its proximity to the ToL. However, the relocation and restoration plans will not only preserve but actively enhance the cultural heritage of the site. The proposal includes protective measures for the Cistercian Abbey ruins and the restoration and maintenance of both Grade II and Grade II\* listed buildings within the site, ensuring their long-term conservation.

10.341 Furthermore, the establishment of a diplomatic mission at Royal Mint Court will not diminish the historical significance of the ToL. The development plans fully comply with the UK's heritage protection regulations, ensuring that any necessary modifications are carried out without compromising the cultural integrity of the surrounding area. Concerns regarding potential harm to heritage are therefore unfounded. Instead, this project presents a valuable opportunity to restore and protect Royal Mint Court and its surroundings for future generations.

*Enhancing local infrastructure*

10.342 Beyond heritage preservation, the relocation of the Chinese Embassy will bring much-needed infrastructure improvements. Upgraded roads, improved traffic management, and enhanced public transport links will make daily commutes smoother and more efficient for residents and visitors alike. Enhanced security measures will also contribute to the overall safety of the area, benefiting the wider community. Public spaces will be revitalised to create a more pedestrian-friendly environment, ensuring that the area remains welcoming and accessible.

*Catalysing modernisation*

10.343 This project represents more than just a relocation—it is a catalyst for modernisation. The presence of a state of the art diplomatic facility will attract further investment, leading to the development of high-quality commercial spaces, public amenities, and community hubs. A well-connected, modern Borough naturally draws businesses, generating employment opportunities and contributing to long-term economic stability.

*Economic growth*

10.344 The embassy's presence will elevate LBTHs status on the international stage, reinforcing its reputation as a key business and cultural hub. This will, in turn, attract investors and businesses across various industries, from retail and hospitality to professional services. It will foster a dynamic and prosperous economic environment that benefits the entire community.

*Promoting sustainable and green development*

10.345 Sustainability must remain at the heart of urban development, and this project aligns with LBTHs environmental commitments. The embassy's architectural plans incorporate eco-friendly initiatives, including energy-efficient designs and the integration of green spaces. These

enhancements contribute to a healthier, more sustainable urban landscape, reducing carbon footprints while improving the overall quality of life for residents. Future generations will inherit a cleaner, more vibrant community.

*A shared vision for progress*

10.346 This project is about progress—progress that balances modernisation with community well-being. By embracing these developments, LBTH stands to benefit from enhanced infrastructure, increased economic activity, and a more sustainable urban environment. At the same time, the relocation and restoration plans will ensure that the cultural heritage of Royal Mint Court is protected and preserved.

10.347 The concerns regarding these proposals are unfounded. The project fully complies with the UK's heritage protection regulations, ensuring that the cultural assets of Royal Mint Court, including the Cistercian Abbey ruins and Grade II/Grade II\* listed buildings, are preserved and restored for future generations. Moreover, the relocation and construction of the new diplomatic mission will not affect the historical integrity of the ToL.

10.348 This development will enhance the area, contributing positively to both cultural heritage conservation and the public's experience. This project offers a unique opportunity to restore and protect Royal Mint Court and its surroundings, benefiting future generations while advancing the Borough's growth and development.

**Xu Ke<sup>159</sup>**

10.349 Xu Ke is the representative of General Nuclear International. The company is working closely with EDF Energy on the Hinkley Point C project, one of the most significant energy projects in the UK. The close collaboration with EDF to ensure the successful completion of this project, which will generate electricity for around 6 million homes and contribute significantly to the UK's net-zero carbon targets.

10.350 Previous speakers have never addressed the economic, cultural, and educational benefits from this project. General Nuclear International believe this significant development of the new embassy presents economic, cultural, and diplomatic opportunities that will benefit not just LBTH but London and the UK as a whole.

10.351 The UK and China share a long history of diplomatic engagement, trade, and cultural exchange. The new embassy will serve as a bridge between two great nations, facilitating stronger relations, increased investment, and deeper collaboration.

*Economic and Infrastructure Benefits*

10.352 One of the most immediate advantages of hosting the new embassy is the economic benefit. The construction phase alone will generate jobs across multiple sectors, from architecture and engineering to security and

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<sup>159</sup> INQ19

administrative roles. Once operational, the embassy will create long-term employment opportunities, benefiting local businesses, service providers, and the real estate market.

10.353 LBTH has a strong but uneven employment landscape, shaped by its financial sector dominance and socio-economic challenges. The unemployment remains above the London average, especially among lower-income and ethnic minority communities. The poverty rate in LBTH was 41%, higher than the London average of 25.93% and the England average of 22.01%. As of the period from October 2023 to September 2024, Tower Hamlets had an economic inactivity rate of 24.6% among individuals aged 16 to 64. This rate is higher than the London average of 20.0% and the UK average of 21.6% for the same age group.

10.354 LBTH is the local governing authority responsible for providing a wide range of services to the Borough's residents. One of the key duties and responsibilities of LBTH is economic development, and they should support the local economy by creating conditions for growth, encouraging business investment, and enhancing employment opportunities. This includes supporting initiatives to revitalize areas within the Borough, like Canary Wharf and other key commercial districts.

10.355 LBTH is responsible for maintaining the infrastructure, services, and overall quality of life for the people who live and work within the Borough.

10.356 Infrastructure improvements will also play a critical role. As part of the planning process, investments in local transport, road systems, and public amenities will be necessary, ensuring smoother connectivity and accessibility for residents and visitors alike. This development of the new embassy will benefit the entire community.

#### *Cultural and Educational Exchange*

10.357 Beyond economics, the new embassy will bring more cultural and educational exchange opportunities. The UK is one of the most popular destinations for higher education among Chinese students due to its world-class universities, cultural diversity, and academic opportunities. In recent years, more than 100,000 Chinese students have been studying in the UK annually, contributing significantly to the UK's higher education sector.

10.358 LBTH hosts several educational institutions that attract Chinese students including Queen Mary University of London, London Metropolitan University, and University of the Arts London.

10.359 Educational institutions in the Borough, including schools and universities, can forge partnerships with the embassy, leading to scholarship programs, language-learning initiatives, and student exchange opportunities. Cultural festivals, exhibitions, and community engagement programs will foster mutual understanding and appreciation between our communities, strengthening social cohesion.

### *Security Measures*

10.360 Security is a top priority for any diplomatic mission. While embassies require robust security protocols, it is essential to ensure that these measures do not disrupt the daily lives of residents. The embassy, along with UK security agencies, would implement state-of-the-art security measures while minimizing inconvenience to the community. Open dialogues with residents would ensure transparency in security planning.

10.361 In recent years, there have been no large-scale protests at the current site of the embassy, and the majority of the large demonstrations mentioned by opponents took place at the previous location during the tenure of the previous embassy, not at the current address. Therefore, opposing the relocation of diplomatic institutions on the grounds of the scale of protests is a matter of national sovereignty. Any country's diplomatic institutions could potentially become the target of protests, but this should not be a reason to obstruct their normal operation. As a mature rule-of-law country, the UK is fully capable of managing demonstrations through legal and administrative measures, rather than using this as an excuse to prevent the relocation of China's diplomatic institution.

10.362 Regarding the risk of terrorist attacks, all diplomatic institutions worldwide could be potential targets, but that does not mean diplomatic missions should not exist. The UK police have long had strict counter-terrorism measures and security systems in place, which can ensure that the new location does not pose an additional threat to local residents or public safety.

10.363 According to the Vienna Convention the host country has the responsibility to ensure the safety of foreign diplomatic missions and provide necessary protection measures. This means that ensuring the safety of the new site is not only a reasonable request but also a duty the host country must fulfil under international law. Therefore, the investment in security at the new site is not a special privilege but an international standard enjoyed by all diplomatic missions in the UK.

10.364 The MPS would provide the necessary external security measures as required, and the security resources may need to be increased. The MPS must continuously adjust security plans in real-time and may need to mobilize additional personnel to ensure adequate protection. Royal Mint is not the only location facing security demands, so using security concerns as a reason to oppose the relocation of the embassy lacks justification.

10.365 The opponents have clearly overlooked international diplomatic practices and lack a basic understanding of the Vienna Convention. International diplomatic security is a duty that the host country must fulfil.

10.366 The UK Embassy in Beijing is located in one of the best and most strategic areas in the capital city of China. The journey from the UK Embassy in Beijing to the Forbidden City typically takes around 15 minutes.

### *Conclusion*

10.367 In conclusion, this project is more than just a diplomatic mission—it is an opportunity to build stronger international relationships for two great nations and it will be fostering local development. With strategic planning, open communication, and working together to fix the problem, the new embassy can be a symbol of progress for LBTH.

#### ***Yin Wang<sup>160</sup>***

10.368 Yin Wang is from China Chamber of Commerce in the UK (CCCUK). CCCUK aims to establish close relations with appropriate UK government departments, companies and business associations, to promote China-UK cooperation and assist the establishment and future growth of Chinese enterprises in the UK.

10.369 The project is primarily supported by considering the important role cultural exchange and diplomacy play in strengthening the bonds between China, the UK, and, most importantly, the residents of LBTH. In today's world, countries are increasingly interconnected, fostering understanding across cultures is not just an aspiration but a necessity.

10.370 All the discussions in this meeting should focus solely on the technical, legal, and environmental aspects of the proposed project, rather than being sidetracked by unrelated political issues. The purpose of such meetings is to evaluate whether the construction plans comply with local zoning laws, building regulations, and environmental standards. Introducing political considerations risks diverting attention from the core objectives of ensuring safety, sustainability, and adherence to legal requirements.

10.371 The Chinese Embassy, like any other diplomatic mission, is entitled to develop its facilities in accordance with local laws and international norms. This meeting's role is to assess the application based on its merits, such as architectural design, environmental impact, and community considerations. Political issues, while potentially significant in other contexts, are irrelevant to the technical evaluation of a construction project and should not influence the decision-making process.

10.372 By maintaining a clear focus on the construction application, the jury can ensure a fair, transparent, and objective review. This approach not only upholds the integrity of the planning process but also reinforces the principle that diplomatic missions are entitled to develop their facilities within the framework of local laws, free from unnecessary politicization.

10.373 The applicant operates strictly in accordance with local laws, regulations, and international diplomatic norms. As a diplomatic mission, its primary role is to foster bilateral relations, promote cultural exchange, and provide consular services to Chinese citizens abroad. There is no evidence to suggest that the embassy functions as a supervision tool in the UK, and such claims are unfounded and lack credibility.

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<sup>160</sup> INQ20

10.374 First and foremost, the Chinese Embassy adheres to the Vienna Convention on Diplomatic Relations, which outlines the framework for diplomatic conduct between nations. This international treaty ensures that diplomatic missions operate within the legal boundaries of their host countries while maintaining mutual respect and cooperation. The applicant has consistently demonstrated its commitment to these principles, engaging in transparent and lawful activities that align with its diplomatic mandate.

10.375 The embassy's primary functions include facilitating communication between the Chinese and UK governments, promoting trade and investment, and supporting educational and cultural exchanges. These activities are conducted openly and are aimed at strengthening the relationship between the two nations. For example, the embassy frequently organises events such as cultural festivals, business forums, and academic exchanges, which are publicly announced and attended by a wide range of participants. These efforts underscore the embassy's role as a bridge for mutual understanding and cooperation, rather than any form of surveillance or oversight.

10.376 Moreover, the Chinese Embassy places a strong emphasis on providing consular services to Chinese nationals in the UK. This includes issuing passports and visas, offering legal assistance, and ensuring the safety and well-being of Chinese citizens abroad. These services are carried out in full compliance with UK laws and regulations, reflecting the embassy's commitment to operating within the legal framework of its host country.

10.377 It is important to distinguish between the lawful operations of a diplomatic mission and unfounded accusations that can harm bilateral relations. The Chinese Embassy has repeatedly emphasized its dedication to transparency and cooperation, and any suggestion of misconduct is inconsistent with its demonstrated track record.

10.378 Some opponents have also objected to the new premises project on the grounds of human rights violations by China. While this has absolutely nothing to do with planning policy considerations and is purely political posturing, as a Chinese citizen who frequently travels between China and the UK, I must point out that such claims are entirely baseless.

10.379 China's progress in human rights is widely recognized, and the country is nothing like what these opponents portray. Since the founding of the PRC, China has grown from a state of extreme poverty to the world's second-largest economy. Average life expectancy has risen from 35 years in 1949 to 78 years in 2021. Over the past 40 years, China has lifted 800 million people out of poverty. A decade-long survey conducted by Harvard Kennedy School has consistently shown that public satisfaction with the Chinese government remains above 90% each year.

10.380 Today, China boasts a thriving economy, social stability, ethnic harmony, and rapid advancements in new technologies and industries. Many foreigners who visit China in person find that their previous misconceptions, shaped by Western media narratives, are completely overturned.

10.381 China is not perfect—just as the UK is not a perfect country—but its progress is undeniable. Some individuals, driven by political motives, seek to vilify and demonize China without any factual basis. Using such arguments to oppose the construction of a new Chinese Embassy is clearly untenable.

10.382 Overall, the existing embassy operates in full compliance with local laws and international diplomatic norms. Its activities are focused on fostering positive relations between China and the UK, promoting cultural exchange, and providing essential services to Chinese citizens. There is no proof to support the claim that the embassy functions as a supervision tool, and such assertions should be dismissed as baseless. The embassy's commitment to transparency and legality underscores its role as a responsible and constructive diplomatic entity.

10.383 The current building which hosts the Chinese Embassy could not accommodate the growing needs of the embassy's work. The establishment of the new Chinese Embassy will serve as a comprehensive cultural base between China and the UK. In LBTH, local residents are fortunate to live in one of the most diverse communities in the country. By hosting exhibitions, language courses, and cultural festivals, the embassy can provide opportunities for residents to immerse themselves in new cultural experience, perspectives, and ideas. These interactions will not only enrich London's cultural landscape but also create meaningful connections between individuals and communities.

10.384 Through outreach programs and community initiatives, the Chinese Embassy aims to promote inclusivity and ensure that everyone, regardless of background, feels welcome and valued. The new embassy will incorporate elements that celebrate local history and heritage, ensuring that the development is in harmony with its surroundings. Upon completion, it will provide a platform for the exchange of diverse and distinctive cultures. This will further strengthen the rich heritage and potential of the significant historical building while stimulating creativity within the Borough and beyond.

10.385 Furthermore, by maintaining an active and comprehensive diplomatic presence, the government of both sides can facilitate high-level discussions between governments, universities, businesses, and local institutions. These exchanges would open doors to new trade opportunities, educational collaborations, and sustainability initiatives—directly benefiting the people and businesses of Tower Hamlets. When encourage dialogue is encouraged, it creates opportunities for growth, investment, and shared progress.

10.386 Global diplomatic precedents suggests that the embassy's presence will not significantly disrupt the daily lives of residents or the Borough's transportation network. Diplomatic institutions worldwide, including those in major metropolitan areas like London, are designed to coexist with their urban surroundings while adhering to host country laws and regulations.

10.387 In addressing the concerns about the potential traffic issues caused by protests, it's important to underscore that peaceful protest is a core

democratic right. By engaging in dialogue with community leaders and protest organizers, authorities can both respect free expression and address residents' concerns proactively. This balanced approach helps build trust and reassures residents that measures are in place to protect their property and well-being. Open dialogue will solve misunderstandings and reduce protests. The new embassy presence would provide better opportunities to engage and communicate with local communities and beyond.

10.388 At the present and in the past, the daily running of the Chinese Embassy never caused any road closure or traffic issues. The number of cases of protest are also very limited. As a diplomatic organisation the Chinese Embassy has always strictly complied with the laws of the UK, ensuring that there is no impact on road traffic and infrastructure. There is no evidence to suggest that relocating the embassy to a new site would inevitably lead to road closures or traffic disruptions. With regards to the difficulties that protests may cause for local residents, everyone has experienced more daily disruptions caused by ongoing roadworks, failure of public transportation, vandalism, and public events.

10.389 There are several factors will ensure that traffic in Tower Hamlets remains manageable:

- a. Strategic Entrance and Exit Points: The embassy's design will include well-planned entry and exit routes that minimize congestion. By optimizing access points and ensuring efficient internal vehicle circulation, the likelihood of external disruptions will be significantly reduced.
- b. Coordination with Local Authorities: The Chinese Embassy, like all foreign missions, will coordinate closely with LBTH and the MPS to establish effective traffic flow measures. If needed, adjustments to street usage and parking regulations can be made to accommodate diplomatic operations while preserving normal traffic conditions.
- c. Public Transportation Accessibility: There is an extensive public transportation network, including bus routes, London Underground stations, and cycling lanes. Many embassy staff members and visitors will rely on these services, reducing the number of private vehicles traveling to the site.
- d. Minimal Impact on Residential Areas: Unlike commercial developments, an embassy does not generate high foot traffic or daily large-scale deliveries. As a diplomatic mission, its operations will primarily involve administrative functions, meetings, and cultural engagements, none of which would significantly contribute to congestion.

10.390 London already hosts multiple embassies in its central areas. The UK government and police have long-standing experience in managing the coexistence of diplomatic missions and traffic planning, and we should trust that they can ensure the new site does not disrupt normal traffic. Additionally, the security measures and entrance/exit planning for the embassy can be designed in a way that minimizes the impact on

surrounding roads. Any necessary traffic adjustments can be addressed through urban management and planning rather than serving as a reason to oppose the relocation.

10.391 Modern embassy designs prioritize urban integration. The Chinese Embassy's security features will be implemented in a way that does not interfere with local movement. In addition, any temporary security adjustments—such as minor road diversions during high-profile diplomatic visits—will be coordinated to minimize disruptions, as is done for other embassies and government institutions across London.

10.392 Evidence shows that everyday hazards—such as traffic congestion, waste management issues, public misbehaviour, and even fire accidents—occur on a daily basis and tend to cause more harm to the public than isolated protest events and terrorist attacks. In the past 20 years, all terrorist attacks in London have mainly targeted on public spaces.

10.393 According to Vienna Convention, any state should guarantee the inviolability of diplomatic premises. Therefore, the embassy area should be a very safe area. Embassies are subject to security protocols designed to protect staff and the surrounding community. Some residents may be concerned about increased police presence or restricted access, but these measures are standard for all diplomatic missions. The UK government ensures that embassy security is balanced with public convenience.

10.394 Additionally, the Chinese Embassy will put in pre-assessed risk management measures. After the Chinese Embassy moves in, the MPS will include the new premises within its protection scope, which would help enhance the overall security of the surrounding area and reduce the possibility of terrorist attacks. The swift deployment of security personnel and rapid-response teams means that any damage and attacks would be quickly repaired and contained, reducing long-term impact on the area.

10.395 A key example is the American Embassy in Nine Elms, London. Before its relocation, there were similar concerns about traffic and security. However, after its establishment, the area continued to thrive, with local businesses and residents coexisting peacefully with the diplomatic mission. The Chinese Embassy's relocation follows a similar model, ensuring minimal interference with the local community while contributing positively to the Borough's economy and global standing.

10.396 The Chinese and UK economies are highly complementary, offering great potential for cooperation and promising prospects. China is the UK's fifth-largest trading partner, with bilateral trade in goods exceeding £110 billion for several consecutive years. The total stock of two-way investment surpasses £130 billion, and exports to China support nearly 500,000 jobs in the UK.

10.397 In 2023, China's direct investment in the UK reached \$1.665 billion. Chinese companies in the UK have expanded beyond traditional sectors such as finance and energy into high-end manufacturing, cultural and creative industries, and information technology. As of 2023, more than 800 Chinese enterprises had established operations in the UK, directly creating over 100,000 local jobs, enhancing workforce skills through

technology transfer, and driving growth across the supply chain. In the field of artificial intelligence alone, joint UK-China R&D projects have attracted over £500 million in venture capital. The two countries also engage in practical cooperation in clean energy, green transition, public health, and biopharmaceuticals.

10.398 China is the UK's fifth-largest source of inbound tourists, making a significant contribution to the UK's tourism, hospitality, retail, and dining industries. According to the latest data from VisitBritain, Chinese tourist arrivals in the UK are steadily recovering, with an estimated 647,000 visits in 2024—up 76% from 2023. By the end of 2025, China is expected to become the UK's third most valuable tourism market, contributing around £2 billion to the UK economy.

10.399 The number of Chinese students in the UK has also continued to grow in recent years. Currently, over 200,000 Chinese students are studying in the UK, making China the largest source of international students. Following China's easing of market access for UK educational institutions, the number of UK university partnership programs in China is expected to increase by 15% in 2025, boosting UK education export revenue by approximately £200 million.

10.400 In conclusion, the relocation of the Chinese Embassy to LBTH should not be seen as a disruption but rather as an opportunity. With careful urban planning, collaboration with local authorities, and adherence to strict traffic management protocols, the embassy will integrate smoothly into the Borough. The UK government's experience in hosting diplomatic missions ensures that any potential challenges will be addressed proactively.

10.401 Rather than causing inconvenience, the embassy has the potential to enhance LBTH's international profile, bring economic benefits, and strengthen cultural ties. As with other embassies across London, its presence will be managed in a way that maintains the normal rhythm of local life, ensuring that residents, businesses, and visitors continue to enjoy the area without unnecessary disruption.

***Peitong Liu<sup>161</sup>***

10.402 Peitong Liu is a resident as well as the principle of a local architectural practice in LBTH.

10.403 London is an extraordinary city. It is a place filled with remarkable architecture.

10.404 London is a place where almost any project is possible. Architects engage deeply in the planning process. This not only enhances the functionality and aesthetics of the built environment but also makes architectural practice more strategic and contextually responsive.

10.405 The historical and cultural significance of the Royal Mint Court site, as part of London's identity and a WHS naturally invites discussion and

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<sup>161</sup> INQ21

debate. Comparisons have been made with China's Forbidden City, the French Louvre and the US White House. However, Tower Bridge is not Buckenham Palace. The embassy district in Beijing is located directly behind the National Museum of China, right next to Tiananmen Square and the Forbidden City.

10.406 The design of the proposals is one of the most sophisticated and well-executed public projects. David Chipperfield Architects represents the highest standards in the industry. In particular, the Cultural Exchange Building would allow previously inaccessible historic ruins to be explored again, making a positive contribution. The ceramic façade of the building will bring an international touch to the entire heritage site.

10.407 LBTH is a welcoming and inspiring place through its vibrant culture and diverse heritage. Residents come from different places with different cultural backgrounds and we all build our lives and careers in this diverse and international city. Multicultural festivals, community art projects and heritage events transform everyday spaces into vibrant hubs. The sense of belonging is what makes LBTH feel like home.

10.408 The new embassy would reinforce those values and would also bring tangible benefits to local residents.

10.409 Overall, as local architects involved in the planning of several listed buildings in London, it is firmly believed that the best way to protect heritage is to keep it alive. The proposals respects the historic context of the WHS and also introduces a contextual, contemporary and elegant aesthetic.

10.410 The embassy would bring people together, contribute cultural and architectural value to both the historic site and LBTH, and enhance the global profile of London.

#### ***Mark Lahiff<sup>162</sup>***

10.411 Mark Lahiff is a developer with over 35 years' experience who has secured over £1b pounds of investment into the UK, primarily in LBTH and the City of London in the last decade. The office and staff are based in Royal Mint Street and they have family who lives next to the application site in 1-20 Royal Mint Street, a building that is now owned by the PRC.

10.412 Since 2008, he has been working on a large, complicated over railway development directly opposite the applicant's site. The project is one of the largest development in the immediate area ultimately delivering 354 apartments, a 460 room aparthotel and a range of retail space. A new entrance to Tower Gateway Station which includes step free access (a new lift and stair core) will also be created. Overall, the ward of LBTH, is being transformed and regenerated.

10.413 The first phase, was delivered at the end of 2019, consists of 265 apartments and a retail food store. The second phase, being the hotel and

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<sup>162</sup> INQ22

an additional 79 residential units, is currently under construction. As part of the scheme 36% affordable housing, both on site and within LBTH is being delivered.

10.414 Not a single owner of the 265 apartments has objected to this application. In fact, many of the buyers and commercial tenants have sent in letters of support. There is a general feeling of disappointment with the dilapidated condition of the subject site and the delays brought about by the planning processes within LBTH.

10.415 This site is perfect for an embassy, especially for a country with a population of 1.4 billion people. As to the scale of the site, China is a huge country with a large population. It is not dissimilar in scale to the new American Embassy but unlike the American Embassy, accommodation will be provided on site for the staff.

10.416 The timeline of this application is as follows:

- PRC acquired the site in 2018.
- The site has been empty and redundant since 2013. It has become a blight on the area and a blight to the UNESCO world Heritage site being the Tower of London – one of the most popular tourist attractions in the UK.
- HE have not objected to the application stating they have no concerns or objections. Indeed, HRP have spoken about the improved backdrop to the listed buildings and Tol.
- This application involves the refurbishment of several listed buildings and the creation of a new cultural exchange building as very positive factors.

10.417 The first planning application was submitted following 3 years of intense work and engagement with consultants and the Borough's professional planning team - recommended by the case officer for approval in 2022. This was turned down unanimously by the committee members.

10.418 This latest application, being almost a replica of the original application was presented to Tower Hamlets committee back in December. Officer's not only once again recommended this application for approval but informed the committee members that there were no valid reasons as to why the original application had been refused. Contrary to the Officer's second recommendation, the committee members once again voted unanimously to refuse the application.

10.419 The vast majority of local businesses and residents are in support of this application but many have voiced concerns about coming forward. There has been a concerted and vociferous campaign to see this application refused. Leaflets have been regularly placed on any parked cars, handed out and shoved through letter boxes. These leaflets provide a QR code and the link takes to you several articles outlining China's political regime and seeking letters of objection.

10.420 LBTH is the most diverse Borough within London – and yet this very same diverse Borough is not welcoming this application because of the credentials of the applicant. LBTH is also one of the most deprived

Borough's in London and yet the significant socio and economic benefits are ignored. The site is in zone 1, the highest PTAL rating of 6B.

10.421 Neither TfL or the MPS are objecting – it has been established that there is ample room outside the embassy for any protests. Moreover, the main road is closed off to traffic every year for the London Marathon and the police have had to deal with Just Stop Oil campaigners who have sought to close off the main road on a number of occasions.

10.422 In relation to the immediate area surrounding the application site, particularly Royal Mint Street, Chamber Street and Cartwright Street, this area is beset by drug addicts, drug dealers and transients – the police are called on a regular basis. Any improved security brought about by a new embassy should be welcome.

10.423 It has been almost 7 years since the PRC acquired this site. This application, which has become a political football, should have been consented at the outset and in line with the planning departments recommendation. After all this time, LBTH have now decreed that they have no legitimate grounds for refusal and in reality, nothing has changed from the original application which is a waste of time and resources.

10.424 Without question, this application should be supported.

***Martin Collard<sup>163</sup>***

*Introduction*

10.425 There are many opportunities that the proposed embassy redevelopment will bring to our community. While this project has sparked discussions and debates, it is important to separate misconceptions from facts and focus on the tangible benefits it will deliver to local businesses, job creation, and economic growth.

*Concerns About the Independence of Chinese Enterprises*

10.426 It has been claimed that all supporters of this project are linked to state-owned enterprises, suggesting a lack of independence in their stance. This is a fundamental misunderstanding of how businesses operate. Chinese enterprises, like all UK enterprises, operate in accordance with the laws and regulations of local countries. They are subject to the same scrutiny, oversight, and regulatory frameworks as any other entity conducting business in the UK. Many Chinese firms have been active in the British market for decades, contributing to the economy and engaging in meaningful exchanges with local communities.

10.427 Moreover, support for this relocation comes from a diverse range of voices, including business leaders, academics, and local stakeholders. To suggest that every supporter is controlled by the Chinese government disregards the legitimacy of their perspectives and the principle of free expression. The Chinese government has long advocated for mutual respect, non-interference, and win-win cooperation. Overseas Chinese

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<sup>163</sup> INQ23

communities and enterprises are diverse and independent, and it is neither accurate nor fair to misinterpret their participation in business and community affairs as part of a coordinated strategy of political control.

10.428 Furthermore, it is important to highlight that many global corporations, including UK and EU-based firms, have state ownership or government-linked investments, yet they continue to operate in a competitive, market-driven economy. The same standard should be applied when evaluating Chinese enterprises, rather than singling them out based on their country of origin. Economic engagement should be based on performance, compliance, and contributions to local prosperity rather than ideological bias.

*Job Creation and Economic Growth*

10.429 The redevelopment of the embassy will be a major infrastructure project that will generate substantial employment opportunities. From architects and engineers to project managers, the project will create jobs supporting local businesses.

10.430 This initiative will also create demand for local suppliers, from construction materials to office equipment, generating indirect employment and growth opportunities for local enterprises. As the embassy establishes itself as a key diplomatic centre, long-term employment prospects will also expand, including positions in administrative support, translation services, logistics, and event management.

10.431 Moreover, major infrastructure projects such as this redevelopment bring long-term benefits by enhancing local transportation networks and utilities, benefiting not only businesses linked to the project but also the broader LBTH community.

*Boosting Local Businesses*

10.432 Once completed, the embassy will become a hub of diplomatic and business activity. Increased diplomatic functions will bring a steady influx of business delegations, investors and international visitors to LBTH. This means more business for hotels, restaurants, cafés and retail stores. Local businesses will see a rise in customers and revenue as international visitors seek accommodation, dining, and shopping options in the area.

10.433 Additionally, major events, conferences, and official receptions hosted at the embassy will further boost demand for event planning, catering, and transport services, creating more business opportunities for local entrepreneurs. This increase in economic activity will support small and medium-sized enterprises, many of which form the backbone of the local economy.

10.434 Further, the presence of a major diplomatic institution will elevate the area's reputation as a commercial and business-friendly hub, attracting more professional services such as legal, accounting and consulting firms to set up offices in the vicinity.

*Strengthening Trade and Investment Links*

10.435 A diplomatic presence fosters business ties. With the new embassy, LBTH will become an important venue for trade and business exchange between the UK and China. By organizing trade missions, business networking events, and industry-specific forums, the embassy will provide local companies with unique access to one of the world's largest markets. This will enable small and medium-sized enterprises in the Borough to explore partnerships, expand exports and establish direct connections with Chinese firms.

10.436 Additionally, trade forums hosted by the embassy will facilitate dialogue between UK entrepreneurs and their Chinese counterparts, helping to remove barriers to market entry and fostering deeper commercial collaboration. As a result, businesses in LBTH will benefit from access to Chinese supply chains and investment opportunities.

*Attracting Chinese Investment to Tower Hamlets*

10.437 London is already a leading destination for Chinese investment, and a modern diplomatic facility will further encourage investors to explore opportunities in LBTH. Sectors such as finance, technology, green energy, and creative industries will benefit from increased engagement with Chinese firms looking for investment and collaboration opportunities.

10.438 By strengthening diplomatic and commercial ties, the embassy relocation will create a more predictable and transparent environment for investors. The establishment of new trade links will directly benefit Tower Hamlets by increasing job opportunities, boosting commercial real estate demand, and enhancing the district's status as a gateway for UK-China economic relations.

10.439 Additionally, infrastructure improvements accompanying the redevelopment will provide long-term benefits to the Borough, creating a more attractive business landscape for both local and international enterprises.

*Conclusion*

10.440 The embassy relocation and redevelopment are not just about diplomacy; they are about growth, opportunity, and community development. By creating jobs, attracting investment, strengthening business ties and supporting local businesses this project will be a catalyst for economic prosperity in LBTH.

10.441 Engagement should be in constructive dialogue based on facts, not fears. This opportunity to make the Borough a thriving centre for global business and investment should be seized.

## **11. WRITTEN REPRESENTATIONS**

11.1 There were a number of consultation responses made to the planning application.<sup>164</sup> Over 200 written representations were also made following

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<sup>164</sup> These are contained within CD4.

the call in of the applications by the SoS, the majority of which were made in objection to the proposals.<sup>165</sup>

11.2 A summary of the representations is given below.

***Foreign, Commonwealth and Development Office/Home Office<sup>166</sup>***

11.3 The letter, dated 14 January 2025, seeks to bring two matters to the attention of the SoS in respect of public access areas and the consolidation of premises.

11.4 The first relates to a request that any grant of consent be subject to a condition. This in respect of the proposed Cultural Exchange Building and Exchange Square requiring a hard perimeter in front of the paved forecourt at the boundary with the public highway and security provision before accessing the area and the removal of unregulated public access to the pavilion and temporary exhibitions.

11.5 The second relates to the consolidation of Chinese diplomatic premises and a request that planning permission is not granted until a plan is in place for this.

***Metropolitan Police Service***

11.6 The MPS have made a number of representations which have evolved as they reviewed their position. These are set out below:

- 27 September 2024  
Kevin Hook, Designing Out Crime Officer at the Designing out Crime Group. This sets out general comments and requests conditions relating to secured by crime measures.<sup>167</sup>
- 14 November 2024  
Jon Savell, Deputy Assistant Commissioner, Specialist Operations at Counter Terrorism Policing. This letter sets out objections to the proposals, including in respect of protest activities.<sup>168</sup>
- 17 January 2024  
Elisabeth Chapple, Deputy Senior National Co-Ordinator. This letter states that the MPS have reviewed the PCLA which addresses their concerns in relation to protest activity and capacity of the site.<sup>169</sup>
- 10 February 2025  
Elisabeth Chapple, Deputy Senior National Co-Ordinator. The letter sets out a timeline of MPS involvement in the application proposals and sets out further details of the MPS changed position. It also provides commentary in terms of the impacts of the 8 February 2025 protests. This letter was produced at my request.<sup>170</sup>

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<sup>165</sup> These are contained within CD12.

<sup>166</sup> CD12.02 and CD12.02a

<sup>167</sup> CD4.12

<sup>168</sup> CD4.27

<sup>169</sup> CD12.01

<sup>170</sup> CD12.186

11.7 The MPS also attended a round table session at the Inquiry. I will come to this later in my conclusions, however I would recommend that the SoS reads these letters in full so as to understand the timeline and position of the MPS.

### ***Greater London Authority***

11.8 The Greater London Authority (GLA) issued a Stage 1 report, dated 23 September 2024.<sup>171</sup> This concludes that LP policies on Opportunity Areas, Central Activities Zone, urban design, heritage, sustainable infrastructure and green infrastructure are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land Use Principles:**  
The proposal is supported in strategic land use terms in line with LP Policies SD1, SD4 and SD5.
- **Heritage and Strategic views:**  
No harm would be caused to the significance of heritage assets or the composition of strategic views and as such the proposed development complies with LP Policies HC1, HC2, HC3 and HC4.
- **Urban design:**  
Broadly supported and though there is non-compliance with LP Policy D9B, with the identified mitigation secured, the application would comply with LP policy D9C and a tall building would be acceptable, on balance.
- **Sustainable and green infrastructure:**  
The energy strategy, circular economy statement and biodiversity should be updated to reflect the latest guidance and further information on whole life-cycle carbon, water and trees as requested.
- **Transport:**  
Supported, subject to securing a suite of management documents (including an Event Management Plan) to mitigate potential development impacts on the surrounding highway network and a comprehensive package of highway and public realm works.

11.9 GLA also provided other comments via a series of memos relating to water, energy, greening infrastructure and whole life cycle carbon.<sup>172</sup>

### ***Transport for London***

11.10 The letter sets out a number of detailed comments, particularly in relation to the provisions within the EMP. It also reiterates comments made as part of the GLA Stage 1 Report. TfL consider that highways impacts can be mitigated against. They also raise no objections in terms of trip

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<sup>171</sup> CD4.07

<sup>172</sup> CD4.18-4.21

generation, vehicle access, car and cycle parking and public realm proposals.<sup>173</sup>

11.11 A separate email from TfL Safeguarding states that there is no objection in principle, but requests conditions relating to construction due to potential effects on nearby railway infrastructure.<sup>174</sup>

***Historic England***

11.12 Two letters were received from HE in respect of above ground heritage, and archaeological impacts.

11.13 In respect of the first, they note that they raised no concerns or objections to the original applications. They also flag that the applications are not supported by a Heritage Impact Assessment (HIA), which is necessary following the publication of updated guidance in respect of WHSs.<sup>175</sup>

11.14 On archaeology, the HE Greater London Archaeological Advisory Service (GLAAS) state that the application is supported by an authoritative archaeological assessment and appropriate mitigation proposals. A low level of less than substantial harm is identified while providing offsetting benefits relating to the conservation of the abbey ruins and the proposed HIC. Conditions are also recommended.<sup>176</sup>

***Historic Royal Palaces***

11.15 HRP make a number of comments on the applications.<sup>177</sup> They consider that the proposals for Embassy House would offer a better backdrop of the listed buildings within the site. They do not find there is significant or harmful impact in key views from the ToLWHS and they welcome the inclusion of a HIS as part of the proposals.

11.16 Comments are made in respect of concern regarding the boundary and edges of the site in order to recognise the importance of the setting to the ToLWHS. Concerns are also raised regarding public safety and security, noting that the Tower Gardens area has potential for protestors to congregate.

***London and Middlesex Archaeological Society***

11.17 London and Middlesex Archaeological Society (LAMAS) express severe reservations about the use of the site as an embassy in respect of adverse impacts on heritage assets from the effects of protests. They also consider that the application details are incorrect in respect of the level differences of the HIC and Exchange Square with East Smithfield. Finally, they consider that the new basement walls to the HIC would be too close to the medieval remains.<sup>178</sup>

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<sup>173</sup> CD4.25

<sup>174</sup> CD4.15

<sup>175</sup> CD4.08

<sup>176</sup> CD4.09

<sup>177</sup> CD4.10

<sup>178</sup> CD4.11

### ***LBTH Internal Consultees***

11.18 A number of internal consultation responses from other LBTH Officer's were also made. This included comments on design and conservation,<sup>179</sup> arboriculture,<sup>180</sup> planning policy,<sup>181</sup> growth and economic development,<sup>182</sup> CIL,<sup>183</sup> sustainability,<sup>184</sup> community safety,<sup>185</sup> environmental health<sup>186</sup> and transport and safety.<sup>187</sup>

### ***Other Consultation Responses***

11.19 Other consultation responses were made to the applications in terms of general comments from the Environment Agency,<sup>188</sup> Active Travel England,<sup>189</sup> Cadent Gas,<sup>190</sup> and UK Power Networks.<sup>191</sup>

### ***Other Written Representations to the Inquiry***

11.20 A joint letter from **Sir Ian Duncan Smith MP, Tom Tugendhat MP, Blair McDougall MP, Alex Sobel MP, Phil Brickell MP and Connor Rand MP**,<sup>192</sup> sets out a number of national security objections. The embassy would be one of the world's largest and would represent a significant upgrade in size and operational scope. PRC represents a strategic threat.

11.21 The site sits over sensitive communication cabling, power lines and is positioned next to a key motorway artery. These are important given a series of attacks on US telecoms which has been attributed to China.

11.22 The proposals include 225 flats for staff. The placement of hundreds more state employees operating from the embassy in central London raises the likely prospect of associated interference activity. China has successfully penetrated every sector of the UK economy and even academic and cultural exchanges are liable to be co-opted into espionage and interference operations.

11.23 The United Front Work Department, which plays a central role in community outreach has been involved in the planning process in an attempt to manufacture support. This organisation is implicated in recent national security cases. United Front linked organisations and state-owned enterprises have sought to support the applications.

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<sup>179</sup> CD4.04

<sup>180</sup> CD4.03

<sup>181</sup> CD4.06

<sup>182</sup> CD4.05

<sup>183</sup> CD4.26

<sup>184</sup> CD4.24

<sup>185</sup> CD4.22

<sup>186</sup> CD4.02

<sup>187</sup> *Ibid*

<sup>188</sup> CD4.13

<sup>189</sup> CD4.14

<sup>190</sup> CD4.16

<sup>191</sup> CD4.17

<sup>192</sup> CD12.76

- 11.24 A further joint letter from **Sir Ian Duncan Smith MP, Tom Tugendhat MP, Blair McDougall MP and Robert Jenrick MP**<sup>193</sup> addressed to Sir Mark Rowly, the MPS Commissioner is also included as an Inquiry representation. This letter seeks to request a formal reinstatement of the MPS previous objections as the protest on 8<sup>th</sup> February comprehensibly disproves the reasons given for the retraction by the MPS.
- 11.25 The **Global Alliance for Tibet and Persecuted Minorities**<sup>194</sup> express deep concern regarding the proposals for the largest embassy in Europe. Inadequate space at the site to accommodate protests and demonstrations could obstruct vital routes and threaten access to essential services. The location of the embassy is near highly sensitive areas, including tourist attractions making it an attractive site for potential protests that could disrupt the local community, businesses and safety.
- 11.26 The proposed embassy site has become symbolic of the Chinese government's authoritarian practices. Approving the embassy would signal tacit approval of these grave human rights violations and embolden China's repressive regime. Approval of the applications would directly undermine the UKs commitment to human rights and democracy.
- 11.27 By blocking this embassy project, the UK will send a strong, principled message that it will not tolerate Beijing's human rights abuses and will stand in solidarity with oppressed minorities, including Tibetans, Uyghurs and Hongkongers.
- 11.28 The **Metropolitan Thames Valley Housing Association** write as leasehold owner of neighbouring land at 14-33 East Smithfield, 1-125 St Mary Grace's Court and 1-20 Royal Mint Street. They reiterate their comments in respect of the original applications in 2021. These related to support for proposed boundary treatments and the shared access via Cartwright Street, with appropriate HVM measures.
- 11.29 The letter makes a number of comments on neighbourly matters. On privacy, the separation distances from Embassy House are commensurate with the existing separation distances and a betterment on the previously consented scheme. In terms of privacy, the previous use was of a commercial/office nature, with the proposed redevelopment of Embassy House providing residential accommodation with new balconies and an assessment of impact of direct overlooking is requested.
- 11.30 The impact of proposed lighting should be fully assessed in respect of habitable rooms of neighbouring dwellings. On noise, consideration of hours of access, location of security stations, security equipment, security patrols, access/gate mechanism closures, are relevant.
- 11.31 **Aspasia Begum MP**<sup>195</sup> forwarded representations from her constituents in objection to the proposals relating to infrastructure and public safety, security and public order, heritage and conservation, public interest

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<sup>193</sup> CD12.200

<sup>194</sup> CD12.44

<sup>195</sup> CD12.07

considerations, transparency, environmental impact, economic implications and community feedback.

11.32 Similarly, **Esther McVey MP**<sup>196</sup> forwarded an objection from a constituent in respect of safety concerns from protest activities, and in respect of spying and surveillance activities from the Chinese Government.

11.33 A significant number of **other individual representations** were received in objection to the proposals. The principal concern is security/safety and related highways implications. Other concerns relate to heritage impacts, residential amenity and other environmental impacts. Objections to the proposed occupants as a Chinese Embassy are also cited.

11.34 A **petition** has also been submitted which has 181 signatures in objection to the proposals.<sup>197</sup> The development will create negative mental health impacts on the residents and all visitors to LBTH and reduce the inclusivity of neighbourhoods. The proposals have no consideration of 'Martyn's Law' security, protests or resilience to terrorist activity against the embassy. A hostile environment would be created around the ToLWHS damaging its OUV. Previous objections have had no consideration. The bomb blast assessment for the previous application said "*....successful blast events in selected locations would result in injuries and deaths to passers-by as well as structure damage and potential building collapse.*" The Chinese Embassy should not be built in LBTH.

11.35 Written letters in support for the scheme has also been received. This includes from:

- BYD (UK)<sup>198</sup>
- China Book International<sup>199</sup>
- China Development Bank (London Office)<sup>200</sup>
- China Merchants Bank<sup>201</sup>
- China Mobile<sup>202</sup>
- China Taiping Insurance<sup>203</sup>
- China Travel Service<sup>204</sup>
- ICBC Standard Bank<sup>205</sup>
- NVC Lighting Ltd<sup>206</sup>
- PowerLink Energy Tech (UK)<sup>207</sup>

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<sup>196</sup> CD12.197

<sup>197</sup> CD12.128

<sup>198</sup> CD12.15

<sup>199</sup> CD12.22

<sup>200</sup> CD12.23

<sup>201</sup> CD12.24

<sup>202</sup> CD12.25

<sup>203</sup> CD12.26

<sup>204</sup> CD12.27

<sup>205</sup> CD12.54

<sup>206</sup> CD12.105

<sup>207</sup> CD12.111

- Shanghai Pudong Development Bank<sup>208</sup>

11.36 There are also **other individual representations** in support. The general theme of the representations in support relate to economic benefits from construction, increased business and tourism, along with community and heritage benefits.

## **12. CONDITIONS AND PLANNING OBLIGATION**

### *Conditions*

12.1 Conditions were discussed at the Inquiry for both of the applications. It must be said that, while LBTH and the applicant are broadly aligned in their support for the proposals, there was much between the parties in terms of the proposed conditions.

12.2 A final version<sup>209</sup> was submitted following the close of the Inquiry. Regrettably, there are still outstanding areas of dispute. These are depicted in red within the schedule, with suggested alternatives depicted in yellow. There is also a separate schedule justification which sets out the parties respective positions over the disputed conditions.<sup>210</sup> I will discuss these further, later in my report.

### *Planning Obligation*

12.3 The applicant and LBTH have entered into a S106 Agreement, dated 1 May 2025.<sup>211</sup> The obligation is accompanied by a CIL Compliance Statement.<sup>212</sup>

12.4 Similar with the conditions, there are parts of the obligation which are disputed. These relate to:

- Construction Phase Employment and Training Contribution
- Employment Skills Training and Enterprise and Apprentice Payment in Lieu
- Energy and Sustainability

12.5 The applicant and LBTH have agreed to include the majority of the disputed points within the s106 agreement in italics and leave for myself and the SoS to determine in their decision letter as to whether they are satisfied that each of the above obligations are CIL compliant and should therefore be retained. Clause 25 of the S106 Agreement gives effect to this arrangement.

12.6 I return to an assessment of this later in my report.

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<sup>208</sup> CD12.135

<sup>209</sup> INQ31

<sup>210</sup> INQ32

<sup>211</sup> INQ34

<sup>212</sup> INQ33

### **13. INSPECTOR CONCLUSIONS**

13.1 I set out my considerations below based upon the evidence before the Inquiry, the written representations and the visits to the site and wider area, using [x] to cross-refer to earlier paragraphs in this report.

#### ***Introduction***

13.2 In the lead up to, and in opening the Inquiry, and mindful of what the SoS particularly wished to be informed about, I set out the main matters to be considered.

13.3 Accordingly, and combined with other matters raised, the main considerations in these appeals are the effects of the proposed development and works upon:

- the significance of heritage assets
- healthy and safe communities
- highway safety

13.4 The analysis will also consider other matters raised and the planning and heritage balance for all appeals.

13.5 Due to the nature of the main issues, there is considerable overlap between healthy and safe communities and highway safety. This report is therefore structured with these topics together under protest activity, and then an assessment in respect of other highways and security matters.

13.6 Before dealing with the main considerations, however, it is necessary to deal with a number of issues relating to the handling of the applications, allegations of political interference and identity of the proposed occupants in light of a number of representations made to the Inquiry. These matters are not specific planning issues in themselves, but they relate to the conduct of parties and the handling of the applications.

13.7 It is thus important that the SoS is cognisant of these issues, as part of ensuring that proper process has been followed, which is fundamental to a robust planning system.

#### ***Application Handling***

13.8 As can be seen from Chapters 10 and 11 of this report, there has been significant criticism of the handling of the application, particularly in respect of the change in the position of the MPS and LBTH. Linked to this are allegations relating to political interference in the planning process.

#### ***MPS***

13.9 Beginning with the MPS, as a statutory consultee, they have had involvement not only in these current applications, but as part of the applications as originally submitted in 2021.

13.10 There is a clear timeline in terms of the correspondence related to the applications [11.6]. The MPS have explained in writing the reasons for the change in position which occurred in January 2025.

- 13.11 Four members of the MPS also participated at the Inquiry, answering questions put to them by myself. This included Deputy Assistant Commissioner (DAC) Jon Savell who wrote the letter of objection on 14 November 2024.<sup>213</sup> As part of the RTS, I went through the timeline of events, in order to further examine how the MPS had arrived at their revised position.
- 13.12 The MPS were willing participants to the Inquiry at my request, answering my questions in full. From what I have seen and heard there is nothing to suggest that there has been anything improper in their approach. I will come to their evidence later in respect of highways and security.

*LBTH*

- 13.13 Having departed from the recommendations of their Officer's, the SDC members sought to give a PRfR in respect of security/highways matters which relied upon MPSs objections, including their appearance at the SDC committee itself [9.7]. This was confirmed at the first CMC where LBTH confirmed that they would be calling witnesses from the MPS.
- 13.14 LBTH and MPS were clearly liaising as part of developing their case for the Inquiry and in early January, when the MPS informed LBTH of their removal of their objections, LBTH duly sought to review their own position [9.12]. LBTH engaged an independent planning witness for the Inquiry and also commissioned a transport report to further review the proposals. LBTH were also active participants in the Application process in the weeks preceding as well at the Inquiry itself.
- 13.15 The date of LBTHs formal communication of their change in position came after other communication to PINS from the FCDO/HO which noted that stance [10.68-69, 10.178 & 11.3]. However, given the short timeframe involved, this does not suggest any improper process.
- 13.16 The statement which appeared on the LBTH website on 7 February presents a different position to that of LBTH as stated at the Inquiry [10.73, 10.113(c), 10.178, 10.231 & 10.291]. This was unfortunate and has clearly given rise to much confusion and concern by IPs. However, its authorship and provenance is unclear and those involved at the Inquiry were unaware of it. In addition, LBTH, led by Kings Counsel, put their case before the Inquiry and allowed proper scrutiny by myself as an independent Inspector. Their case was clearly set out in evidence and submissions and was unambiguous.
- 13.17 There is a significant strength of feeling from IPs in respect of these applications and it is appreciated that the change in position in these applications was a significant blow to those who remain in objection.
- 13.18 Nonetheless, it is a long-established principle in planning that parties are expected to review their cases, as a part of sensible on-going case

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<sup>213</sup> Should the SoS wish to review this, a copy of the livestreaming for this session can be found here: [Royal Mint Court Inquiry - 13.02.25 PM - Thursday 13 February 2025, 1:00pm - Tower Hamlets Council webcasts \(1:11 onwards\)](https://www.gov.uk/planning-inspectorate)

management. I am thus satisfied that LBTH and indeed the MPS fulfilled this responsibility. They also fully fulfilled their duties to the Inquiry itself.

*Call-In Process*

- 13.19 It is believed that this is the first case for an embassy which has been dealt with in this way. In line with the standard procedure for call-in applications, I was appointed to conduct the associated Inquiry and to write this report which contains my conclusions on whether planning permission and listed building consent should be granted.
- 13.20 The Inquiry was held in accordance with the Town and Country Planning (Inquiries Procedure) (England Rule 2000. I have taken into account:
  - the material submitted to the LBTH as the local planning authority;
  - the Core Documents and Inquiry Documents;
  - any relevant legislation and policies, including changes to legislation, any new Government policy or guidance and any new or emerging development plan policies; and,
  - any other matters that are material to the case.
- 13.21 As is standard in any such call-in case, the recommendations made are based on the planning evidence before me in my professional capacity as an independent Inspector. I consider that proper process has been followed and that I am able to come to a reasoned recommendation based on my professional judgement.

***Chinese Embassy in the UK***

- 13.22 In making these applications, permission is sought for the change of use of Royal Mint Court to an embassy use, which is classified as *sui generis*. The applicant is not pursuing a personal permission and indeed do not consider it to be legitimate to restrict permission on the basis of the future occupants [8.11-8.13].
- 13.23 Any grant of planning permission to develop land shall enure for the benefit of the land and of all persons for the time being interested in it as per s75 of the Town and Country Planning Act 1990 (TCPA 1990). This is a longstanding principle. PPG also advises that it is rarely appropriate to provide a personal permission, other than in exceptional circumstances where development that would not normally be permitted may be justified on planning grounds because of who would benefit from the permission.<sup>214</sup>
- 13.24 This is also reflected by the Vienna Conventions<sup>215</sup> and in the development plan [6.7, 6.47-50]. National planning policies are silent specifically in terms of embassies.
- 13.25 A significant number of the objections received focus on moral, ethical and cultural issues in respect of the PRC. On questioning from myself, the legal principle of a use as outlined above was accepted by many of the

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<sup>214</sup> Reference ID: 21a-015-20140306

<sup>215</sup> In giving reference to these in the plural, these relate to the 1961 Vienna Convention on Diplomatic Relations and the 1963 Vienna Convention on Consular Relations.

IPs. However, many also have also drawn upon site specific issues related to the proposed occupants:

- 13.25.1 First, reference was made to the fact that the size of the site itself would house one of the largest embassies in Europe [10.228, 11.25]. It was held that this would only realistically be occupied by a 'superpower' country or state; its very scale would simply preclude smaller countries who require an embassy use in the UK.
- 13.25.2 Second, it was also argued that the identity of the occupants cannot be wholly discounted due to the increased likelihood of mass protests specifically against the PRC [10.170-175] and evidence was presented in this regard in terms of security and highways matters.
- 13.25.3 Third, the proposals are also not speculative and have been specifically designed for the occupants, rather than on a generic end user basis.
- 13.25.4 Fourth, evidence has been given by the applicant supporting the proposal on the basis of specific occupants of the site and their own planning witness made reference to the impact of a major international partner such as the PRC investing in the site.<sup>216</sup> In citing economic and diplomatic benefits, specific reference was made by the applicant to the PRC as the world's second largest economy and the UK's fifth largest trading partner and the proposal supporting improved diplomatic and trading relations with the PRC.<sup>217</sup> The applicant does not seek to rely on this to justify the application scheme, nonetheless evidence has been put before the Inquiry in support of the proposal based on the occupation by the PRC.
- 13.25.5 Fifth, there were also IPs who appeared in support of the proposals, precisely because of the specific occupants at the site [10.320-441].

- 13.26 Within the land use planning regime, the broad principle that planning permission runs with the land clearly must stand; the applications are for an embassy use and should be judged on a 'nation-neutral' basis in accordance with the development plan. The Vienna Conventions are also an important material consideration in terms of the duties it places on facilitating premises [6.47-6.50].
- 13.27 In this regard, any ethical or similar objection to the provision of an embassy for a specific country cannot be a material planning consideration. It would not be lawful to refuse permission simply because it would be for a *Chinese Embassy* (my emphasis). The same would hold for any other specific country seeking an embassy use through the planning system.

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<sup>216</sup> CD11.05 paragraph 3.17

<sup>217</sup> Ibid paragraph 11.13

- 13.28 However, all sides were in agreement that the occupier would be the PRC. This may, therefore, give rise to specific planning implications for the main considerations of these applications.
- 13.29 A clear line can be drawn; PRC is not a material consideration in itself, nor are any ethical/moral considerations which may or may not arise from the PRC as occupants. But the detailed proposals and site-specific planning evidence relating to the effects arising from the proposed occupants and the main considerations I have identified are relevant. This goes both to assessment of harm and benefits, as well as to the assessment of conditions and recommendations.
- 13.30 In adopting this stance, I will structure my report to reflect a two-step approach; firstly relating to the broad use, and secondly consideration of the planning implications arising from the specific occupants. If the SoS was to take a different view, and not agree that the second step is relevant, the matters are thus clearly separated out.

### ***Heritage Assets***

#### *Introduction*

- 13.31 As set out in section 2 of this report, the site contains a number of heritage assets. Royal Mint Court has seen much change over the years, which brings about complexity in its heritage. It is also part of the Tower Conservation Area (CA) and forms part of the setting of internationally significant heritage assets, including the ToLWHS.
- 13.32 It is important to note that there has been very little objection in terms of the works to the heritage assets. The broad consensus, including from HE, is that the development and works would represent an improvement to the site within the sensitive backdrop to the ToLWHS and other important heritage assets [11.8, 11.13].

#### *The Royal Mint Site*

- 13.33 Having outgrown the space at the Tower of London, and due to a need to modernise production, the site was selected to house the Royal Mint due to its proximity to the ToL so that it could be protected. The site has a long history before it was cleared in the early 1800s [2.4].
- 13.34 The Royal Mint was opened in 1810 and, in addition to the listed buildings I will assess below, also contained factory buildings, housing, offices, stabling and stores. It was bounded by a tall wall and was a guarded site with 24hr patrols. It was later adapted in the 1880s as the industrial revolution took hold and technology and capacity advanced. Further rebuilding took place at the turn of the century. Its later history has been previously described elsewhere in this report [2.6].

#### *Johnson Smikre*

- 13.35 Named after its architects, this Grade II\* listed building dates from 1805-11 and formed part of the original phase of development of the Royal Mint. Located in a prominent central location within the site, it was built as a grand palace which accommodated a number of apartments. The

building is of 3-storey stone construction, with a central pediment, doric columns and a balustraded parapet.

- 13.36 The radical interventions of the late 1980's removed most of the interior<sup>218</sup> and parts of the bays to the exterior at the rear. The roof was wholly replaced. The front and side façades remain the most in-tact.
- 13.37 Accordingly, the architectural interest of the building has been much affected but what remains of the fire Georgian elevations is strong and its prominent 'palace' stature remains. It also has considerable historic interest; this relates to its architects who were responsible for other notable buildings such as the British Museum and other country houses. Its historic interest is also firmly founded in its use and status in terms of what would have been originally a largely industrial site as the Mint.
- 13.38 Given the large-scale losses to the interior, this building represents something of a blank canvas in terms of adaptions and thus it is unsurprising that a significant number of works are proposed [4.7].
- 13.39 Commendably, the proposed works are underpinned by a clear understanding of the heritage attributes of the building. In particular, the Johnson Smirke Building would remain a focal point as part of the embassy campus through its use for ceremonial diplomatic receptions and gatherings.
- 13.40 Physical works would seek to reinstall a series of reception rooms from the surviving entrance hall and would reestablish a sense of cohesion to the plan-form. Upper floors would house administrative functions. There would not be a true reinstatement of the lost historic plan form, but nonetheless the works would be entirely consistent with the formality and prominence of historic state rooms behind the Georgian palace façade.
- 13.41 Works to the exterior would be sensitive to its architectural significance, subject to conditions which would ensure that the detailed approach is appropriate.

#### *Seamans Registry*

- 13.42 This Grade II listed building has a long history of intervention and adaption. Originally designed by Johnson in 1805 as five houses for Officers of the Royal Mint, this building was altered in 1906-1910 for use as the Registry of Shipping and Seamen, hence its name today. It was also expanded, and use altered for offices and silver stores during the 20<sup>th</sup> Century.
- 13.43 Historically, it was of brick and stone construction, in an irregular block formation 4-stories in height with basement. Its design was that of a Georgian Palladian building with typical architectural treatments such as cornicing, parapet and stepped bays, but a much simpler treatment than that of the Johnson Smirke building.

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<sup>218</sup> With the exception of the hall and stairs to first floor

13.44 Seamans Registry was even more of a victim of the drastic interventions in the late 1980's, due to its altered and decayed state at that time. This involved the large scale demolition of the registry with the retention of the courtyard facing elevations, which were also extended to the east and north, adopting the Georgian idiom. The remainder of the building was enlarged and redeveloped in an entirely different architectural language, in brick with stepped heavily glazed façades above the perimeter wall to Mansell Street.

13.45 In light of this, today the retained southward-facing stepped façade constitutes the only remnants of architectural interest, and even this is somewhat diminished by the replica extensions to it. The 1980s extensions also dominate. It does, however, retain historic interest as part of the Royal Mint site, particularly in terms of the front shared courtyard area between it and the Johnson Smirke Building.

13.46 Minimal refurbishment works are proposed to the remaining historic facades and these would be sensitive to the remaining historic fabric [4.11]. Of benefit would be the removal of a modern 1980s wall which would allow Seamans Registry to again be a freestanding structure within the forecourt area of the site.

13.47 The proposed refurbishment works would reuse the existing 1980's structure but would replace and reconfigure the stepped facade to Mansell Street. The materials would be brick metal and glass and would overall have a simpler architectural treatment. While this would remain distinct from the historic façade, it would be more austere and less competitive than the 1980's treatments.

#### *Entrance Lodges*

13.48 The entrance lodges were built as part of the original development of the Royal Mint site. Designed by Smirke, the two lodge buildings form part of the stately entrance into the site, reinforcing the palace-like status of the Johnson Smirke Building.

13.49 The symmetrical lodges incorporate rendered facades, and tall white piers to square headed entrance arches. They are connected by a brick wall and railings, although today only the lodges and plinth wall pre-date the Edwardian era. Again, the lodges were changed and adapted as the Royal Mint site evolved, including the building of a curved extension to the northern lodge to house a substation, which is a somewhat incongruous incursion. The railings are of an Edwardian design (as opposed to Georgian) but are believed to be replicas, installed in the 1980s.

13.50 This grade II listed building has architectural significance as the lodges themselves are generally intact. The historic interest relates to the lodges being part of the original design and in particular as part of the security and protection of the site, their architect, and their group value with other listed buildings.

13.51 Works to the lodges is limited to repair and minor alterations [4.28]. The increase in height of the later railings would make no discernible change to the significance. The replacement of the substation building with a new

entrance pavilion has been carefully designed to ensure its subservience to the northern lodge with a simple architectural treatment and form.

13.52 Although something of a folly, the relocation of the Seamans Registry portico represents a good reuse of this feature [4.27]. It would not detract from the status of the lodges.

*Boundary Wall*

13.53 It was agreed that the large stock brick boundary wall is a curtilage listed structure. It has been the subject to much rebuilding over the years, and for the most part, the fabric dates from the early 20<sup>th</sup> century onwards. However, it has architectural and historic interest as it forms part of the historic 'fortified' perimeter around the Royal Mint.

13.54 The proposed works to the wall involve refurbishment and retention with some rebuilding and alterations along East Smithfield and Mansell Street [4.30-4.31]. These would be sympathetic and appropriate to this structure.

*Archaeology*

13.55 While there are no SMs within the site, it lies in an area of designated archaeological importance within the development plan. The known archaeology within the site relates to the remains of the Black Death Cemetery and St Mary Grace's Abbey. It is common ground that the remains are of comparable significance to a SM. There is also significant potential for other medieval, post medieval and modern finds.

13.56 An extensive programme of archaeological works was undertaken across the study site during the later 1980s, prior to the construction of the existing office buildings. This revealed the cemetery to the north behind the façade of Seamans Registry where around 420 burials were excavated when the 1986 works and extensions were undertaken to this building.

13.57 The Cistercian Abbey is located in a central position within the site, leading down towards East Smithfield. Uncovered remains include the Lady Chapel, Chapter House, walls, dining room, kitchens and chapel. The 1986 building of Murray and Dexter House preserved the upstanding remains but placed concrete foundations within these. Fragments are covered by the basements of these buildings as well as by the raised courtyard garden. There is an area of wall towards the site boundary with East Smithfield which is uncovered and has vegetation growth around it.

13.58 The setting of these assets is currently minimal, there are no public views of these at all. Even from within the site, the appreciation of these is limited due to them being within the basement areas of the current buildings.

13.59 The proposals would conserve the full extent of the ruins. The conversion works for Dexter and Murray House would reuse the structural elements of the buildings, and thus the ruins will be preserved within the existing basement envelope. As part of the development of the Cultural Exchange building to the southwestern extent of the remains the slab would be

extended at ground level and piling works would take place, in accordance with the piling plan submitted with the application.<sup>219</sup>

- 13.60 The former Abbey kitchen area, along with the ruins currently exposed to the elements would form part of the HIC, which would be visible and accessed via Exchange Square. In accordance with the Archaeological and Heritage Outreach and Interpretation Strategy (AOIS) material which was archived following the 1980's excavation would be displayed, along with information regarding the history of the site and other artifacts. This would be secured by condition. While works for the creation of Embassy House would be in proximity to the remains, this would be consistent with the conservation of these assets and would be managed through the relevant conditions. It is also noted that Exchange Square, which would allow for public views of the remains, would be set at basement level in order to facilitate this [11.17].
- 13.61 In terms of other development at the site, the remains of the Black Death burials are thought to remain within the western part of the site, beneath the courtyard west of the Johnson Smirke Building. Unexcavated remains of the Abbey are also anticipated to survive beneath the western part of the site fronting Tower Hill. For both, I am satisfied that there is likely to be limited physical impacts as a result of the proposals. However, due to the significance of the remains and their potential, conditions would be secured to ensure survey work, assessment and mitigation (if necessary).
- 13.62 In terms of impacts, HE GLAAS and LBTH identify a low level of less than substantial harm, but state this would be mitigated and offset by benefits from the conservation of the ruins and the HIC. The applicant adopts this insofar as they acknowledge the *potential* for harm, and thus ascribe that level *if* it occurred. They also consider that the HIC is a substantial benefit [8.7, 11.14].
- 13.63 This is clearly a very sensitive site and there is significant potential for further finds. However, on the basis of the evidence before me, I do not consider there would be harm. There is a clear and detailed archaeological record at the site which has helped inform the application proposals. The nature and scope of the conversion works would entail limited physical impacts which can be carefully controlled. I thus consider that those who ascribe harm have taken an excessively precautionary approach. I agree with the applicant that should any harm occur, which would be during the construction phase of the development, this could only ever be a very low level.
- 13.64 The Cistercian Abbey ruins and their setting would be improved by the HIC as this would reveal their significance to the public for the first time and allow for their appreciation. This would represent a substantial enhancement to these assets and a benefit of the scheme.

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<sup>219</sup> CD8.04 Figure 30

*Setting*

- 13.65 As a purpose-built site to house the Royal Mint, the assets set out above also have a distinct group value which has a shared setting within Royal Mint Court. This contributes to their significance.
- 13.66 Murray and Dexter House are located to the rear of the Johnson Smirke with a U-shaped formation around a raised courtyard area. Dexter House is located behind the flank wall of Seamans Registry while Murray House with its wide floorplate extends across part of the southern flank elevation of the Johnson Smirke Building. They are taller than both of these listed buildings and are poor quality with a barrage of materials and external design 'features' from an impoverished period in architectural design. In this regard they are somewhat invasive as they compete for attention and, in particular crowd the Johnson Smirke Building to its south side.
- 13.67 While Murray and Dexter House would be retained, they would be extensively reimagined and there is much to commend the design approach of the proposed scheme in general, and in terms of its historic character, context and significance. To aid the understanding of the genesis of the site design, evidence was presented to the Inquiry by the scheme architect [4.3].
- 13.68 Embassy House would have an elegant composition which would represent a simplification and a considerable improvement on the current poor-quality facades. The set back of external glazing and the creation of balconies would offer visual relief. Its height would be increased but that would be mitigated through its design.
- 13.69 The Cultural Exchange building would have a distinct quality in the proposed architectural language and the treatments of the facades with high quality materials. It would present a much-improved arrangement, which will retreat back from the Johnson Smirke Building to the southern end. Its use would also be subservient to that of the Johnson Smirke Building as part of the embassy campus.
- 13.70 Landscaping proposals within and around the perimeter of the site would also enhance the setting of these assets. Specifically, the proposed Exchange Square would be a significant enhancement on what is currently unattractive 'dead' space. The pavement works outside the lodges would improve the public realm. HVM measures would be discrete in that they form an integral part of landscaping. These are sympathetically designed.

*ToL WHS*

- 13.71 This WHS contains multiple highly graded designated heritage assets within it, including the White Tower (Grade I) and the Inner Curtain Wall (Grade I), which includes the Queens House, a SM. The nature of any impacts on all these assets would be the same and therefore my analysis is set out in terms of the impact upon the WHS, in order to avoid repetition.

13.72 As part of their PoE, the applicant's heritage witness produced a Heritage Impact Assessment<sup>220</sup> for the ToLWHS in order to address comments made by HE [11.13]. This has also informed my evaluation.

13.73 It is impossible to do any justice to the significance of these heritage assets in a few short sentences but in brief, the ToL is an internationally famous monument and one of England's most iconic structures. William the Conqueror built the White Tower as a demonstration of Norman power, siting it strategically on the River Thames to act as both fortress and gateway to the capital: it is the most complete example of an 11th century fortress palace remaining in Europe. A rare survival of a continuously developing ensemble of royal buildings, from the 11th to 16th centuries, the ToL has become one of the symbols of royalty. It also fostered the development of several of England's major state institutions, incorporating such fundamental roles as the nation's defence, its recordkeeping and its coinage. It has been the setting for key historical events in European history, including the execution of three English Queens.

13.74 There are seven attributes that express the OUV of the ToL, which are: internationally famous monument, landmark siting, symbol of Norman power, the concentric defences (around the White Tower), physical dominance (of the White Tower), medieval remains and physical historical associative evidence.

13.75 Of these attributes, many relate to its setting in terms of physical location, as appreciated through visibility, and symbolic attributes which rely on how the ToL relates to its setting.

13.76 The application site has a clearly demonstrable historic and symbolic relationship with the ToL, given that the Mint was previously housed within it, and then moved to the application site purposefully in proximity to it. These assets have a shared setting which adds to their significance.

13.77 In terms of visibility, my extensive site visit along with the visuals within the Townscape and Visual Impact Assessment (TVIA)<sup>221</sup> readily confirmed the preservation and enhancement of views, including strategic views in the LVMF. In particular, the reimagining of the existing buildings into Embassy House and the Cultural Exchange building would represent a marked improvement to the Royal Mint site and would present a better backdrop when looking out from the ToL towards it.

13.78 It is clear that the OUV of the WHS and special interest of the buildings are vulnerable to development in their setting distracting from its dominance and by undermining the symbolic expression of power and landmark attributes. This is not the case for these proposals; overall the significance of ToLWHS as derived from the setting would be enhanced.

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<sup>220</sup> CD11.04

<sup>221</sup> CD20.3 and CD8.03

*Tower Bridge*

13.79 An internationally recognised Victorian icon, the Grade I listed Tower Bridge was opened in 1894. Built in the gothic revival style with French chateau influence, it is a bascule bridge with huge stone towers and cast iron balustrades. While its primary setting relates to the River Thames, it is an important part of the strategic highway network, connecting routes along Tower Hill, East Smithfield and other roads, along Tower Bridge Road across the River Thames to Southwark. It is also a tourist attraction in its own right.

13.80 In terms of setting, there is a functional relationship between the application site and the Bridge through the strategic highway route, and a historic relationship as part of the development of this area related to the ToL. However, these assets do not figure prominently in the visual experience of each other. There would thus be no effect of the proposals upon this listed building.

*ToLCA*

13.81 Finally, I come to the area-based designation of the ToLCA. Naturally, the ToL forms the heart of the CA, but the CA boundaries are broader and encompass the application site, St Katharine's Dock's and Tower Bridge. There is a complex pattern of overlapping developments in the CA, founded in the strategic importance of the ToL. The historic association and positioning of the Royal Mint site with the ToL is a hugely important part of the character of the CA. The architectural and historic attributes of the listed buildings within the application site, as previously described, along with the powerful expression of security contained in the encircling walls helps define the uniqueness and special quality of the site within the CA.

*Embassy Use*

13.82 Some concern was also raised about the use of the site as an embassy affecting the experience and appreciation of the archaeology, Tower Bridge, the ToL and the CA through disruptive protests.

13.83 I deal with protest/security matters later, however in relation to archaeology, the remains would be better revealed than at present as part of the proposed use, and this would be a clear benefit.

13.84 The use would be consistent with the historic fortified use of the site. I do not consider that it would compete for power with the ToL. The ToL would remain the 'jewel in the crown' of England's heritage; the change of use of the Royal Mint site into an embassy campus would not threaten that value. I consider this would be consistent with the symbolic attributes of the ToLWHS.

13.85 I am also mindful that this is a busy, thriving part of London for all: for residents, for employment, for traffic and for tourists. Even if the embassy use were to attract more people to this area for protest activities, the significance of all of these assets would not be harmed.

### *Conclusion*

- 13.86 It is my strong view that in design terms, this is an exemplary scheme. This is in terms of architectural design and heritage which promotes sustainable adaptive reuse while making considerable positive enhancements correcting the failures of a poor quality, damaging, 1980's scheme. The proposals would fully accord with LP Policies D1-5, D8, D10 [6.24-6.28] and THLP Policies S.DH1, D.DH2, D.DH6, and D.DH7 [6.29].
- 13.87 Strictly speaking, the proposed development does not comply with LP Policy D9b as the site has not been specifically identified as suitable for a tall building and a height specified [6.27]. However, the proposal would accord with the impact assessment under D9c and with the policy emphasis as a whole.
- 13.88 Because of the diligence taken in its design and the thorough appreciation of its historic context, the special interest, the OUV and the character and appearance of all of the heritage assets as discussed above would be preserved and enhanced.
- 13.89 The proposals would therefore fully accord with the suite of heritage policies within the LP, including HC1-HC3 and S.DH3 and S.DH5 of the THLP. The statutory duties enshrined in the PLBCAA 1990 would also be fully met [6.14-6.22].

### ***Healthy and Safe Communities and Highway Safety***

#### *Protest Activity*

- 13.90 The predominant concern which goes to the heart of both healthy and safe communities and highway safety relates to protest activities associated with the proposed embassy use.
- 13.91 At over 52,000sqm, the proposals would create one of the largest embassy sites in the UK [4.1]. Comparisons have been made with the American Embassy at Nine Elms [10.31]. That site is around 48,000sqm but does not include any staff accommodation.<sup>222</sup> In this regard the scale of the site is comparable with that which may be sought by another major power and is not out of the ordinary in that respect.
- 13.92 In considering this matter, there are important key principles to set out; the first being the Vienna Conventions. These set out overarching legal obligations on the UK Government. Their requirements are clear and in particular, in the event of a threat to an embassy premises in the UK, there is a duty to provide intelligence to support the protection of diplomatic premises as well as the reduction of risk, regardless of the location [6.47-6.50]. These obligations enure regardless of the size of the embassy and regardless of the country who occupy the premises [8.13].
- 13.93 In respect of objections related to national security concerns levelled at the specific occupants at the site, there is limited evidence to back up such claims. Should these be found to be true, they would be dealt with

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<sup>222</sup> CD 11.05 p16 paragraph 3.12

through other means, via other legal processes and by various agencies, as per the Vienna Conventions. That is not something which could be controlled through the planning system.

13.94 Second, there is broad consensus that there is the right to protest. This is accepted by the applicant [8.27], and the MPS made extensive reference to this in their oral evidence. Indeed, London as the capital city is a prime location for large scale protests and these occur on a reasonably regular basis, for a number of different reasons, such as on environment grounds.

13.95 It is accepted that embassies attract protests [8.28]. I was able to witness this at my site visit which included a visit to the American Embassy environs where there was a protest camp in place. I also am mindful that the geo-political landscape for any country can readily change at any time, and thus new protest activity may arise at an embassy where historically there has been none. This could occur regardless of the size of the premises. The creation of an embassy at the application site would therefore give rise to the realistic proposition that protest activities could take place.

13.96 However, the MPS have a duty to police embassies and protest activities and it was confirmed at the Inquiry that the MPS would facilitate lawful protests and police them as necessary to make them safe for all involved. This evidence was given directly by the Deputy Assistant Commissioner and is clear and compelling.

13.97 In respect of the proposed occupier, evidence suggests that protests have historically taken place outside the current embassy site.<sup>223</sup> In addition, other larger protests against Chinese authorities have also taken place in other areas of London including Trafalgar Square and Parliament Square [10.84].

13.98 Considerable caution needs to be taken in attributing the protest which took place on 8 February with around 3,000 people in attendance (based on MPS estimates given in oral evidence) as a typical example going forward [8.27 and 8.34]. Not least because part of the reason for the protest was in relation to these application proposals and the Inquiry [8.45]. Notwithstanding this, I do consider that there is a significant likelihood that protest activities would occur against the PRC in this location. It is impossible, however, to quantify the scale of any such future protests.

13.99 It should also be noted that, in confirming their position, the MPS have clearly considered the proposed occupants of the embassy and the protest which took place on 8 February [11.6 – 4<sup>th</sup> bullet point].

13.100 Having established the above, I now turn to my analysis of the effects of such protest activities on highway safety.

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<sup>223</sup> The MPS confirmed that 47 protests were held outside the current Chinese Embassy in 2023 and 2024, 14 had over 100 protestors, 7 had over 200 protestors - see CD12.186

## Highway Safety

13.101 The PDCA was submitted a part of the original applications in 2022. This has been used to determine the number of people that can be accommodated within the streets surrounding the site, based on densities of between 1.076-2.153 people per sqm in an area to the front, outside of the lodges and railings, along Mansell Street, and along East Smithfield at around 2107sqm. A smaller area of 892sqm to the site frontage and part of Mansell Street was also assessed.

13.102 This was updated for the Inquiry<sup>224</sup>, where the areas were refined further. The largest area encompassing the full extent of the front of the site was refined to 2,180sqm, the original smaller area extent was amended to 1062sqm, with an additional smaller area to the front of the site which takes into account HVM along the kerb edge of 801sqm included in the assessment.

13.103 A further clarification note was also provided.<sup>225</sup> This was produced on my request, following the evidence given by the MPS to the Inquiry.

13.104 The MPS clearly stated that they considered a density of 2 people per sqm to be the appropriate standard. They also clarified that they had visited and measured the front of the site to be around 272sqm as a realistic area where protest activities would occur as they consider that protestors would wish to congregate to the front of the site, rather than the wider areas assessed by the applicant. Based on this the MPS considered that the space would be able to hold around 500 protestors without spilling out into the surrounding streets.

13.105 The applicant's clarification notes takes this figure and maps it to the front area of the site. The applicant also states that had the 272sqm area been presented by the assessments, it would have shown that this area could accommodate around 500 protestors, which accords with the MPS.

13.106 My position is that the 2022 PDCA and updated Inquiry assessment appear extremely optimistic in the numbers of people that could be accommodated in the respective areas. For example, the second assessment concluded that at an upper density of 2.153 people per sqm, around 4600 people could be accommodated at the whole of the site frontage area (2180sqm), and 1725 people to the smaller front area (801sqm) without spilling out onto the road.<sup>226</sup>

13.107 It was confirmed by the applicant's witness that the assessments do not take into account human behaviours. For example, protestors would not be likely to stand up directly next to the perimeter walls. Moreover, having visited the site and having walked around its perimeter, there are constraints in the size of pavement area and it is difficult to understand how the figures arrived at presents a realistic assessment of the available space.

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<sup>224</sup> CD 11.07 p30-40 paragraphs 6.3.1-6.3.16

<sup>225</sup> INQ25

<sup>226</sup> See Table 2, p38 of CD11.07

13.108 While I am again somewhat cautious of relying on the protests of 8 February as an accurate gauge, in terms of pure numbers, at the round table session, the MPS estimated attendance of around 3000 at this event, and this did spill out onto the road. The MPS also commented that while the protest was safely policed, protestors stated that they are unlikely to use the whole of the pavement space identified by the report and are most likely to base themselves closer to the front of the site by the main entrance.<sup>227</sup> These matters provide at least some evidence that the PCLA and updated assessment overestimates the capacity at the site for protests.

13.109 The MPS are the authority who are experienced in protest management and are best placed to give a realistic evaluation. Thus, I agree with their position in terms of the site area, density and resultant capacity as a credible assessment. In any case, the applicant accepted this position, as confirmed by their clarification note.

#### Traffic

13.110 The site is located on a very busy part of the strategic highways network which carries high volumes of traffic. As such, protest activity which spilled onto the streets could cause significant disruption. The protests on the 8 February disrupted vehicular traffic, bus services, cyclists and pedestrians at Tower Hill, Mansell Street and East Smithfield and resulted in road closures and diversions [10.24]. TfL advised that there was a serious impact [8.49 & 11.6 – 4<sup>th</sup> bullet].

13.111 The MPS note that the location of the site means that it may require more police resource than other similar embassy locations. In particular this is in order to manage the potential for serious disruption to the road network as evidenced by TfL and the action needed to keep traffic flowing.<sup>228</sup>

13.112 They also express concerns should there be an escalation of the scale of protest activities in terms of impacts upon policing resources and traffic management.<sup>229</sup> However, the MPS are clear that the protest of the 8 February was policed safely and balanced the rights of protestors with the local community and road users.

13.113 The claims of the objectors that future protests will occur at this site are noted as is the sentiment that large scale protests which took place not outside the existing embassy, but at other locations in London, would now be drawn to the application site instead [10.85, 10.92, 10.175, 10.215, 10.307].

13.114 I also share the reservations of the MPS and should there be large scale protest activities occurring, the location of the site would have potential to cause severe disruption to the highway network.

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<sup>227</sup> CD12.186

<sup>228</sup> *Ibid*

<sup>229</sup> *Ibid* and CD12.01

13.115 However, as previously stated, it would be impossible to predict the scale and frequency of any future protests at the site and certainly the recent protest at the site could not be taken as an example of the scale of any such future protest activities in the future.

13.116 On balance, I consider that the ability of the site to accommodate around 500 protestors with no undue effect on the highway network is reasonable. Should any larger protests occur, these would be policed and managed by the MPS, as per their legal duty to and as confirmed by the MPS at the Inquiry.

#### Protests activity at Cartwright Street/Royal Mint Gardens

13.117 Turning to the risk of protest activity occurring to the rear of the application site, and causing disruption to the local residents who live in this area [10.23-24, 10.127], the MPS clarified their position in January<sup>230</sup> citing that experience demonstrates that protestors are unlikely to congregate at the rear of embassies if there is no access and no ability to be seen or heard by those inside.

13.118 In support of this position, it was also noted in oral evidence at the Inquiry that the 8 February protest occurred at the site entrance and not to the rear.

13.119 By their very nature, protest activities are designed to disrupt and as such the concerns of those to live directly adjacent to the site are appreciated. That said, I consider the risk would be limited.

#### Disruption of local residents

13.120 I accept that protest activities could disrupt the day to day lives of local residents more broadly, including those at St Katharine's Docks. This would be in respect of road or pavement closures in the vicinity. However, in light of the ability of the site to accommodate up to 500 people and based upon historic frequencies of protest activities, I consider that any disruption would likely to be occasional and not at a level which would justify the refusal of the proposed use at the site on such grounds.

13.121 Again, the MPS were clear in their duty to police for the safety of all.

#### Mitigation

13.122 A package of mitigation measures to assist in the management of protests has been included as part of the applications. This includes the storage of portable barriers so that these could be quickly installed should any protest activities occur which necessitate their use.

13.123 An EMP would also be secured via planning condition. This would set out details of how large gatherings would be managed, including arrangements for protests. A financial contribution to public realm would also secure improvements which would improve the local pedestrian experience and there would be a specific contribution to Royal Mint Green which would achieve 'secured by design' improvements to improve safety

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<sup>230</sup> CD12.01

and perception of safety for pedestrians and other users through landscaping.

#### Conclusions on protest activities

13.124 Based on the above, while it is accepted that protest activities would be likely to occur at the site, the impacts would be appropriately managed to reduce their effects on the highway network as well as on the local residents. There would be no policy conflict arising from the proposals in this regard.

#### *Other Highway Safety Considerations*

13.125 Turning now to other highways matters, firstly, it is important to note that TfL are in support of the applications, subject to conditions [11.10-11.11]. LBTH as a highways authority also support the proposals [9.14].

13.126 The site is extremely well located in terms of public transport [2.11]. The site is also accessible for pedestrians and cyclists. In particular, the subway entrance at East Smithfield which links the site to St Katharine's Docks, Tower Hill and ToL would be much improved from its current poor state.

13.127 In terms of trip generation, the proposals would likely generate a total of 18 vehicle trips in the AM peak hour and 12 vehicle trips in the PM peak, for both car driver trips and delivery and servicing trips. This equates to a vehicle every 3-5minutes.<sup>231</sup> Even from a baseline of zero trips, given that the site is vacant, TfL considered that this is unlikely to generate any significant impacts on the road network, subject to on-going site management.<sup>232</sup>

13.128 Amendments to vehicular access arrangements include the egress of vehicles onto East Smithfield from the rear service road [4.33]. This would be for service vehicle and cars parked in the basement at Embassy House. This is a high-trafficked road and the proposals have been subject to a Stage 1 Road Safety Audit which highlighted visibility issues for vehicles and pedestrians. This change was of particular concern to RMCRA [10.40].

13.129 Although my visit to the site was only a 'snapshot' in time and was not representative of the traffic conditions, I appreciate that this access and its relationship to East Smithfield and the pavements appears to be a difficult one.

13.130 However, TfL made no objections on this matter. Egress would be naturally slow due to the 'air lock' security arrangements proposed on the service road and would be for the service vehicles only; cars would use Royal Mint Street to exit the site. Delivery and service trips would only make up a small proportion of overall vehicular movements at 4 AM peak hour trips and 2 in the PM peak hour. Surface materials at the cross-over would also delineate the pedestrian route/footway through the access.

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<sup>231</sup> CD 11.07 p47 paragraph 6.5.20

<sup>232</sup> CD 4.25

13.131 On car parking, all of the proposed 84 spaces would be provided with an electric vehicle charging point (EVCP). The need for all spaces to have such a provision is queried, although not objected to, by the applicant<sup>233</sup> but I consider this would be entirely appropriate as the site is within an Ultra Low Emission Zone, and as part of encouraging more sustainable vehicles.

13.132 Cycling provision would be in the form of 413 long-stay cycle parking spaces within the basement of Embassy House, in accordance with LP standards for staff accommodation, when compared against Class C3 residential use standards set out in LP Policy T5.

13.133 Again, this level of provision is queried by the applicant<sup>234</sup> and in this instance I agree this would be a significant over-provision. The use of the site as an embassy is *sui generis* and table 10 in Policy T5 considers that the most relevant standard should be used. I consider the standard for Class C3 to be most appropriate to the embassy use which would amount to the provision of 180 long stay cycle parking spaces.<sup>235</sup> This is because the accommodation at Embassy House would be for staff and their families. These would reside for a time-limited period. The area is also well provided give a choice of sustainable transport options, in addition to cycling. A lower provision would in my view, accord fully with Policy T5.

13.134 Other conditions and obligations on highways matters, such as the requisite highways works, the delivery and servicing plan, construction logistic plan, and public realm improvements, would also secure mitigation and improvements.

#### Conclusions on other highways effects

13.135 Overall, I am satisfied that there would be no harm arising from the proposals in respect of highway effects. There would be no policy conflict arising from the proposals in this regard. In particular, LP Policies T1-T7, T9, LBTH Policies S.TR1 and D.TR2-4 and NPPF paragraph 116 would be met [6.38-40].

#### *Other Security Considerations*

##### Terrorism

13.136 RMCRA, FOSKD and TRA all raise significant concerns in respect of the potential threat from terrorism arising from the proposed embassy use and the safety of the neighbouring residents in which they represent [10.14, 10.131-10.136, 10.188].

13.137 In particular, RMCRA commissioned the Crilly Consulting: Security Design Peer Review (referenced as the Crilly Report)<sup>236</sup> to assess the application proposals in terms of security impacts. This document was effectively adopted by FOSKD and TRA. This document concludes that the site would

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<sup>233</sup> CD 11.07 p18 paragraph 4.1.23

<sup>234</sup> *Ibid* p19 paragraph 4.1.27

<sup>235</sup> CD11.01 p23 paragraph 4.42

<sup>236</sup> CD10.01 and CD10.02

be attractive to terrorists as an iconic and symbolic site and that the estate will be located within a 'collateral damage zone.' It also identifies a number of specific vulnerabilities in the sites security design.

13.138 The evidence within the Crilly report is challenged by the applicant's security witness, and each have sought to discredit the other in terms of expertise and the methodology of assessment of the likelihood of a terrorist attack. At the heart of this is a disagreement in terms of the level of threat that the proposed embassy poses and the resultant effects on neighbouring residents.

13.139 Whether or not a specific threat would arise from the proposed use of the site, both in terms of an embassy, or a Chinese Embassy is somewhat academic; the threat to the UK from terrorism is currently assessed as being 'substantial', meaning an attack somewhere in the UK is 'likely.'<sup>237</sup> Terrorist attacks are serious, devastating the lives and communities affected by them and in light of the terrorist threat level, it is right to consider this matter seriously.

13.140 For planning, the NPPF requires appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security [6.33]. It is also recognised by the LP [6.28]. Fundamentally, the policy basis relates to design matters and designing out crime and reducing risk.

13.141 The site has a particularly close relationship with neighbouring residential properties at St Mary Grace's Court, not least as this actually forms part of the wider site [10.3-10.4]. However, in terms of neighbouring residential properties being in a collateral damage zone, terrorist attacks are indiscriminate in their nature and have far reaching and deadly consequences. It is an unfortunate and unfathomable truth that if such an attack were to happen, residents would be vulnerable. But residents would be vulnerable should any attack take place in this location, regardless of its use.

13.142 I agree with the applicant that planning permission should not be blocked simply on the basis of a potential terrorist threat; if that was the case then nothing would ever be approved [8.19].

13.143 It is important to note here that the MPS have not objected in respect or terrorism concerns; even their original objections did not make any specific response on this, although I note that the MPS letter of 14 November 2024 notes the Crilly report and states that the vulnerability of residents at St Mary Grace's Court should not be discounted. In making their comments on the applications, FCDO/HO have also not raised any objections relating to terrorist activities.

13.144 Nonetheless, in line with planning policy, it is important that appropriate and proportionate steps are taken to secure mitigation for terrorist related threats. It is also important to assess other general security impacts, as part of considering matters of healthy and safe communities

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<sup>237</sup> CD11.06 p18 paragraph 60

in the round. The detailed security design was not within the scope of the applicant's security witness' evidence. This was covered by the scheme architect's evidence, principally because it was all considered as an integral part of the scheme design process, which is how it should be.<sup>238</sup>

### Crime

13.145 Similarly, the planning policies relating to crime and fear of crime [6.28 & 6.33] seek to address this through design means, rather than preventing a particular use [8.14]. I am also mindful that the Designing Out Crime Officer for the MPS did not, and has never, raised any objections on this basis [11.6, 1<sup>st</sup> bullet point].

### Security Measures

13.146 In terms of mitigation measures for safety and security, these would include HVM bollards and planters surrounding the site, including to the footbridge access to Embassy House along Cartwright Street. The measures would also involve contributions towards new CCTV and street lighting.

13.147 As previously referenced, there would also be an EMP conditioned as part of any approval. There would also be ongoing liaison with LBTH, and the MPS Court, as is required as part of statutory duties. The steering group as defined by the EMP, would also include the Local Housing Association who manage St Mary Grace's Court. These would help address concerns regarding security considerations for the lifetime of the development.

13.148 By their very nature, embassies also have their own relatively high security measures, as opposed to other uses. Public access is limited and there would be security measures at the various entry points into the site as well as within the site. This would also include the bridge access to Embassy House from Cartwright Street.

13.149 The vulnerability and weaknesses identified in the Crilly report include the proposed wooden fence to the rear of the site. This would replace an existing fence which is around 1m in height with a security rated wooden fence which would vary in height between 1.1-3m.<sup>239</sup> In light of this, and also given the level differences between the rear of St Mary Grace's Court and the service access road, the scaling of the fence would be difficult. As acknowledged by the applicant, appropriate treatment could also be applied to the fence to address concerns relating to arson.<sup>240</sup> A proposed condition relating to details of security measures to the undercroft of St Mary Grace's Court would also ensure security measures are assessed and implemented.

13.150 No fence would be provided to the rear of the dwellings which are located at the corner of Cartwright Street and East Smithfield as these would be located adjacent to the secure access point for the service road.

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<sup>238</sup> CD11.08

<sup>239</sup> *Ibid* figure 8.1.27

<sup>240</sup> *Ibid* paragraph 8.1.50

13.151 In making changes to the scheme design based on UK fire regulations, the applicant has also clearly demonstrated their commitment to ensuring safety and there is no reason to believe that the fire strategy, which would be subject to condition would not consider safety for all affected. Whether terrorist groups could exploit the strategy would go beyond a reasonable planning consideration.

13.152 Finally, bringing a vacant and derelict site back into use, combined with the above measures, is likely to create a safer environment in the surrounding areas around the site. This could reduce crime [8.25].

#### HO/FCDO Comments

13.153 The HO/FCDO made a number of detailed comments in respect of highway and security provision at the Cultural Exchange Building and Exchange Square [11.3-5]

13.154 The applicant has taken a pragmatic approach to this. They were clear at the Inquiry that they did not consider it necessary to amend the design to incorporate a hard perimeter. Instead, this area would not be made as part of the inviolable premises, which would be a separate process and would thus allow the relevant authorities access to police and protect this area. Security arrangements to access the HIC could also be incorporated [8.59]. The applicant clearly states that these can also be addressed by condition [8.60].

13.155 A design change in respect of this matter is not before the me, but even if it were, I agree with LBTH that this would reduce the heritage and overall benefits of the scheme [9.27]. Should the SoS consider the design change to be necessary, I also agree with LBTH that it would represent a material change which would require a separate consultation and possibly a separate planning application [9.28].

#### Conclusions on other security considerations

13.156 Overall, I consider that the package of security measures proposed would be wholly proportionate to the proposed use of the site. The policy objectives set out in LP policy D11 as well as paragraphs 102 and 135(f) of the NPPF would be met [6.28, 6.30-1 & 6.33].

#### **Other Considerations**

##### *Living Conditions*

##### Privacy

13.157 There is currently a limited separation distance between the elongated rear façade of Murry and Dexter House and the rear of residential properties along Cartwright Street [10.49-51].

13.158 The proposed conversion of this into Embassy House would use the same structure, but would give separation distances from the internal accommodation through the creation of rear balconies for the proposed apartments [4.18]. This would ensure that, with one exception, separation distances between habitable rooms in Embassy House and St Mary Grace's Court would be over 18m.

13.159 The exception relates to the edge of Embassy House with Royal Mint Street where the distances would be 14.5m, however this would be an improvement over the current distance of 13.3m, and the removal of the bulky stair core would help reduce the overbearing experience from the existing buildings in this location. I am also mindful of the general density of development in the area and other areas in the immediate locality where separation distances are reduced.<sup>241</sup>

13.160 Overall, I am satisfied that there would not be a loss of privacy to the occupants of St Mary Grace's Court and future occupants of Embassy House.

#### Noise and Disturbance

13.161 Guests who would attend formal events would use the main front entrance to access the site and would enter the Johnson Smirke Building and Cultural Exchange Building via designed processional routes within the site. In light of the location of these buildings within the site, noise and disturbance from events would be limited. In addition, any residual effects would be actively managed as part of the proposed EMP. There would thus be no effect upon living conditions of neighbouring residents in respect of noise and disturbance, in accordance with policy.

#### Daylight/Sunlight

13.162 A comprehensive assessment of the effects of the proposed development on daylight and sunlight amenity to occupiers of neighbouring residential properties has been made as part of the application.<sup>242</sup> This also looks at overshadowing to existing amenity areas in the vicinity of the site. Taken as a whole, there would be a high level of compliance with some isolated areas of low adverse effects at St Mary Grace's Court and at the new development Royal Mint Gardens.

13.163 However, taking into consideration the general level of compliance for daylight, the negligible impact on sunlight and inherent design factors at St Mary Grace's Court and Royal Mint Gardens the impacts would be minimal.

#### Conclusions

13.164 While there would be some minor impacts on living conditions, I find overall there would be general compliance with LP Policy D6 and THLP Policy D.DH8 as well as other relevant amenity policies [6.35]. The proposals would also accord with NPPF paragraph 130c [6.36].

#### *Public Sector Equality Duty*

13.165 The public sector equality duty (PSED) (set out in section 149 of the Equality Act 2010), requires, amongst other matters, that a public authority must have due regard to the need to eliminate discrimination, and to advance equality of opportunity between persons who share a

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<sup>241</sup> CD11.03 paragraphs 8.1.27-8.1.33

<sup>242</sup> CD8.12 and CD1.16

protected characteristic and those who do not share it. Age, ethnicity and disability are protected characteristics.

13.166 Representations from local residents have referred to protected groups being adversely affected by the proposals as they do not promote community cohesion and there would also be accessibility issues in terms of protests and accessibility to private homes and to wider tourist attractions [10.144, 10.154, 10.295-297].

13.167 In this case, the accessibility issues arising from any protest activity would be limited and temporary. The MPS are also bound by the duties in the PSED in terms of managing such events. The lack of promotion of community cohesion is presented as a general concern and no specific details related to this have been provided. Accordingly, I do not consider that the proposal would have a materially adverse effect on, or discriminate against, those with a protected characteristic.

#### *Other Topics*

13.168 On other uncontested topics, the applicant's planning witness covers these in detail.<sup>243</sup> This includes sustainability and energy, landscaping and open space, Urban Greening, Ecology, noise, air quality, and flooding and drainage. I have no reason to dispute this evidence.

#### ***Planning Conditions and Obligation***

##### *Conditions*

13.169 Before I consider the individual conditions for each application in detail, there are important principles which must be established.

13.170 Conditions can enhance the quality of development, secure benefits and enable development to proceed by mitigating adverse effects. Conditions must however, meet the 6 tests in order to be fair, reasonable and practicable [6.53].

13.171 NPPF paragraph 2 states that decisions must reflect international obligations. The Vienna Conventions allow for a country to choose to adopt UK standards or other equivalent standards [8.62-63]. The applicant also acknowledges that international obligations cannot be relied upon by the PRC as a reason for failing to apply for planning and listed building consents for the proposals [8.64].

13.172 Thus, in considering these proposals under the UK planning regime, it is perfectly proper to impose conditions upon these applications. This is accepted in principle by the applicant as demonstrated by their input and negotiations as well as their agreement to many of the proposed conditions. However, some of the specific detailing within the conditions is disputed, and in part this relates to some of the particular areas of dispute relating to applicable treaties under the Vienna Conventions. I come to this below.

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<sup>243</sup> CD11.05, section 7

13.173 Overall, I consider that the conditions meet the tests and in the event that planning permission and listed building consent are granted, they should be imposed as set out in Annex D. Conditions that are required to be discharged before development commences should be avoided unless there is clear justification [6.53]. I have proceeded on the basis that the pre-commencement conditions are accepted as justified by the applicant given their presence on a list that they have developed with LBTH.

13.174 I have also reordered the conditions, made minor adjustments and additions to some of the conditions, in the interests of precision. I highlight any significant changes, below. The schedules of conditions in Annex D includes all my adjustments and additions.

13.175 Should, however, the SoS take a different view, the draft set of conditions as provided by the applicant and LBTH can be found at INQ31 which highlights the areas of disagreement. The commentary table regarding the reasons for the disputes between the parties is also provided at INQ32.

#### Listed Building Consent

13.176 As is standard, conditions to deal with commencement and the approved plans are necessary (conditions 1 and 2) for clarity.

13.177 Due to the statutory duty under s16 of the PLBCAA1990, conditions relating to a method statement, as well as a written specification and timeline for building recording and a condition seeking the retention of hidden historic features are reasonable and necessary in order to preserve the special interest of the buildings (conditions 3, 4 and 6).

13.178 For similar reasons, condition 5, which requires the submission of specific details relating to windows, doors etc is necessary. This is accepted by the applicant, all apart from details relating to entry control and CCTV as these are considered to be sensitive matters. I consider such details to be necessary in order to protect the architectural interest of the building. While I appreciate the sensitivities around security, details should relate to the number, location, scale and method of fixing to the listed building rather than any technical security details in terms of the security systems. Were this to be uncontrolled, the applicant would be able to erect any number of CCTV units, at any scale and this could cause harm to the special interest of the listed buildings.

#### Planning Permission

13.179 Again, as is standard, conditions to deal with commencement and the approved plans are necessary (conditions 1 and 2) for clarity.

13.180 A demolition and construction condition and a separate condition requiring a piling method statement are necessary in order to protect residential amenity and highway safety (conditions 3 and 4). Similarly, conditions relating to non-road machinery emissions and the submission of a Construction, Environment Management Plan and Construction Logistics Plan are also necessary for the same reasons (conditions 5 and 6).

13.181 Similarly, the imposition of conditions relating to the submission of a dust management plan and PM10 monitoring as well as a land contamination remediation scheme are necessary (conditions 7 and 8).

13.182 Due to the significance of the non-designated archaeology at the site and the potential for further finds, a condition relating to the submission of a written scheme of investigation is necessary (condition 9).

13.183 In terms of plant, conditions relating to noise standards and a restriction of additional units, including water tanks, air conditioning and other plant are necessary in order to protect residential amenity and in terms of the character and appearance of the area (conditions 10 and 11).

13.184 In order to protect biodiversity and ecology, conditions 12, 13, 14, and 15 are necessary as they relate to tree protection, vegetation removal, details of proposed tree planting and the submission of a net gain assessment, mitigation and enhancement strategy.

13.185 For the same reasons, and in the interests of character and appearance, details of hard and soft landscaping of all public realm and open spaces is necessary. I have amended criterion i) which relates to an urban greening factor of 0.3 as a target in accordance with LP Policy G5, rather than as a minimum (condition 16).

13.186 To mitigate flood risk and protect residential amenity, conditions 17 and 18 which relate to water infrastructure network upgrades and sustainable urban drainage strategy, are necessary.

13.187 In relation to safety and residential amenity, conditions relating to the implementation of the fire strategy and for the submission of an overheating strategy are necessary (conditions 19 and 20).

13.188 For sustainable waste management, a condition requiring an operational waste management strategy is necessary (condition 21).

13.189 A condition relating to the implementation of a deliveries and servicing plan is necessary in the interests of highway safety and residential amenity (condition 22).

13.190 Further conditions relating to highways matters are necessary. These include the provision of 84 car parking spaces and their retention (condition 23). This is with full EVCP provision, as previously discussed in my assessment, above [13.131]. Also as previously discussed, a condition for the implementation of cycle parking for 180 is necessary, albeit at lower levels than the original 413 space proposals [13.133] (condition 24).

13.191 In terms of security, a condition relating to HVM measures to the rear of the site and improvements to the security around St Mary Grace's Court access are necessary, for reasons previously discussed (conditions 25 and 26). I have added in a retention clause to these conditions as this was omitted.

13.192 A condition requiring details of external facing materials and architectural detailing is required in order to protect the character and appearance of the area and the designated heritage assets. For the same reasons as the

listed building consent condition, I have retained the requirement to submit entry control and CCTV details (condition 27).

13.193 Again, in order to protect the character and appearance of the area, conditions are necessary to limit permitted development rights for the erection of fences and boundary treatments, and restrict the addition of further pipes and other accretions to the external faces of the buildings (condition 28 and 29).

13.194 A condition requiring the details of aerials and satellite dishes as well as removing permitted development rights for additional equipment is reasonable and necessary in my view. First, I consider it appropriate to reference the Vienna Conventions here, given the proposed use of the site. Second, the restriction of further such equipment is necessary to ensure that they are sensitive to the setting of the listed buildings at the site and in terms of wider character and appearance (condition 30).

13.195 The imposition of conditions ensuring that the residential units within Embassy House would be ancillary and limited visitor accommodation are necessary to secure the safety of the embassy and its functions as well as the residential amenity of neighbouring residents (conditions 31 and 32).

13.196 A condition relating to energy and sustainability is proposed and accepted in principle by parties, with the development to be carried out in accordance with the approved energy strategy and other measures. As part of this there is a dispute between parties in respect of achieving BREEAM standards. While LBTH does not see any sound reason for departing from UK standards, under the Vienna Conventions, other codes and practices may be followed. I therefor consider that preferred wording of LBTH would be unenforceable. The applicant's suggested wording retains reference to BREEAM, or applicable equivalent standards and is to be preferred.

13.197 In respect of post-completion verification reports, this is simply further certification which would require no ongoing monitoring and thus it is unclear why the applicant considers this to be sensitive from a security perspective. LBTHs wording is thus preferred on this issue. I have amended the condition accordingly (condition 33).

13.198 A condition is necessary relating to mechanical ventilation of units at Embassy House, in terms of air quality and residential amenity (condition 34).

13.199 As previously discussed, an EMP shall be the subject of a condition for reasons of security, residential amenity and highway safety [13.123, 13.147, 13.161]. I agree with the applicant that the requirement for the steering group to meet every 6 months is overly prescriptive. I consider that there may be instances where the frequency of meetings would need to increase or decrease. I have omitted the wording to this effect altogether, as the terms can be set more generally as part of the EMP in any case and it is not necessary for the condition wording to be so specific in this regard (condition 35).

13.200 A condition requiring the submission of an architectural and heritage outreach interpretation strategy (AHOIS) is necessary as part of securing

a significant heritage benefit of the proposed development, as referenced above [13.64]. This would build upon the submitted strategy.

13.201 I agree with the applicant that the LBTH preferred condition is overly detailed; a condition does not need to set out every specific matter in which a strategy should cover to allow for flexibility. That is not to say that matters that LBTH wish to see covered would not be, but that would be for discussion between the parties when the relevant details are submitted for discharge. I consider that replacement with a clause relating to the provision of operational details to be acceptable in this regard. This could include details of staffing levels, security, the conservation of archaeological assets and monitoring as part of it in any case (condition 36).

13.202 I do consider that a further dedicated condition relating to the operation of the HIC centre to be reasonable and necessary. While the condition on the AHOIS relates to the overall strategy for the ongoing management of archaeological ruins, the proposed condition for the HIC sets out parameters relating to the overall function of the HIC, including opening times and ensuring public access. This would secure the heritage benefits and has a clear planning purpose (condition 37).

13.203 Finally, I do not consider a condition for privacy screening measures is reasonable or necessary to be imposed. This relates to units on the eastern elevation of Embassy House which have a separation distance of less than 18m from the windows of residential properties at St Mary Grace's Court. I have assessed the impacts above [13.163] finding no harm in this regard.

#### *Planning Obligation*

13.204 In order to comply with Regulation 122 of the CIL Regulations it is necessary to assess whether each obligation would be necessary to make the development acceptable in planning terms; is directly related to the development; and is fairly and reasonably related in scale and kind to the development [6.54]. Clause 25 of the obligation functions as a 'blue pencil clause', allowing provisions to be found invalid if necessary, without affecting the validity of the remaining provisions [12.5].

#### Schedule 3 – Financial Contributions

13.205 This sets out the financial contributions payable under the proposed applications. The agreed contributions are all index linked and relate to the following.

- 13.205.1 *Carbon Offset Contribution* of £498,153.00 payable towards Carbon Offset Projects in the Borough.
- 13.205.2 *CCTV Review Contribution* of £336,000.00 payable towards a Council-led review of managed CCTV in the vicinity of the development and implementation of changes identified by the review.
- 13.205.3 *Development Co-Ordination and Integration Contribution* of £52,332.60 towards projects which would address cumulative

impacts of construction activity, including on construction logistics or transport impacts, environmental impacts, social health and economic impacts and equality and diversity impacts.

13.205.4 *Royal Mint Green Contribution* of £75,000.00 for improvements to Royal Mint Green in order to address community safety matters, as previously discussed.

13.205.5 *Urban Realm Study Contribution* of £200,000.00 towards a study of the urban realm at Tower Hill/East Smithfield/St Katharine's Way/Mansell Street with a focus on future local public realm and pedestrian connectivity improvements and expenditure on such works.

13.206 These contributions meet all of the legal tests and are in accordance with relevant LP and THLP Policies, the details of which are set out in the CIL Compliance Schedule<sup>244</sup> and I adopt this assessment for these contributions.

13.207 On the latter two agreed contributions, separately and following the submission of the signed deed, the applicant wrote to PINS on 1 May 2025 to state the following:<sup>245</sup>

*"In accordance with the applicant's internal policies, the specific scope of works and initiatives to which the Council intends to apply the CCTV and Royal Mint Green contributions must be provided and reviewed before approving and processing the contribution payment. As LBTH has not yet submitted the required scope, the contributions for the CCTV and Royal Mint Green initiatives will necessitate further discussions between both parties to finalize [sic] arrangements."*

13.208 LBTH then belatedly wrote to PINS on 30 May 2025 requesting that their letter be disregarded and setting out a number of reasons why.<sup>246</sup> Exceptionally, both letters were accepted as Inquiry documents as they related specifically to the planning obligation.

13.209 In respect of this request, this was an issue which was not raised at the round table session at the Inquiry and relates to contributions which have been subject to longstanding discussions between the applicant and LBTH and are formally recorded as agreed [12.3 – 12.5]. It also clearly has come as a surprise to LBTH. I have considered these obligations and found accordance with the legal tests. To dispute these retrospectively in such vague terms is poor practice from the applicant. I am thus disregarding this statement.

13.210 Should any further disputes occur, I note that the obligation contains a dispute resolution clause (clause 19) in the event parties are unable to come to an agreement on matters.

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<sup>244</sup> INQ33

<sup>245</sup> The full letter is set out in INQ35

<sup>246</sup> INQ36

13.211 Turning now to the contributions which are not agreed [12.4]. Both the *Construction Phase and End User Phase Employment and Training Contribution* of £209,330.00 and the *End User Phase Employment and Training Contribution* of £604,247.00 are disputed by the applicant. These contributions would towards supporting and providing training and skills needs for local residents in accessing local job opportunities both for construction phase and end user phase. The purpose of these contributions would be to provide job opportunities in order to tackle poverty and social exclusion.

13.212 THLP Policy S.SG2 specifies that development is considered to contribute to the vision and objectives where local training and employment opportunities in the construction and end use phases are provided.

13.213 These are a requirement for all applicable developments and for all major commercial development under the Planning Obligations SPD. However, the applicant argues that this should not be applicable for a *sui generis* development which is of a unique nature.

13.214 I consider that such an obligation is justified in these circumstances. A range of activities will take place at the site which is within the CAZ and OA. While LP policy identifies embassies as a strategic function of the CAZ that does not mean that such a use should be precluded from meeting this obligation.

13.215 In addition, for both construction and end user phases, the applicant would employ Chinese nationals and non-local people given its diplomatic function. As such the embassy use is likely to mean that there are limited opportunities for local people to gain employment in each phase. The Borough has above average levels of unemployment and that should not be adversely affected by the introduction of an embassy use in this prime location within the CAZ. The contributions would thus offset this and as such meet the tests.

Schedule 4 – Employment Skills, Training and Enterprise

13.216 Part 1 of this schedule contains a number of employment obligations. Taking these out of order, the obligation seeks 20% local employment, and direct provision of apprenticeships during the construction phase. However, this is a circumstance where I agree with the applicant that it would not meet the tests, due to the specific nature of the use and the fact that the applicant is not seeking to employ local residents. The financial obligations outlined above would, in my view, offset this and there appears to be a degree of double counting here in what LBTH are seeking.

13.217 However, relating to apprenticeships, a sum of £27,247.00 for each apprentice not provided, is included as part of this schedule. This specific obligation would, in my view, be entirely appropriate and consistent with other financial obligations I have assessed above in addressing this specific matter of offsetting employment and training contributions within the Borough.

13.218 This obligation also relates to value of contracts as 20% of local goods and services procured throughout the construction phase and

demonstration of this. While no financial offset mechanism is included here, given the nature of the use and specific occupants, I find that this obligation would go beyond what is fair and reasonably related to the proposals.

13.219 In light of my findings on the above, the obligations relating to the submission of an employment strategy statement and local employment and equal opportunities statement would not be reasonable.

#### Schedule 5 – Energy and Sustainability

13.220 This seeks reasonable endeavours to ensure that the development is designed and constructed so that it is capable of being connected or would not prejudice the future connection to a District Heating Network. It also sets out specific requirements in terms of the installation of pipework and other related matters.

13.221 I note the security concerns raised by the applicant in terms of energy connections, however this obligation does not require the occupants to commit to connect to such an energy source. Rather, it would simply ensure that there would be the means to connect at a future point, if such an opportunity was needed. It would meet sustainability requirements and here I find that it would meet the tests.

#### Schedule 6 – Design Certification

13.222 This obligation seeks to ensure that the scheme architect continues to be employed as the lead architect throughout the construction phase. The obligation includes notification and measures should this not be possible.

13.223 This is agreed insofar as in relation to parts of the building that are being designed in the UK in respect of the listed buildings and the facades of Embassy House and the Cultural Exchange Building. This is because the applicant is using Beijing based architects for the interior of the buildings, as per arrangements in the Vienna Conventions.

13.224 In light of the high-quality scheme design, I consider this obligation to meet the tests, but in the terms set out above – i.e. for the listed buildings and the facades.

#### Schedule 7 – Highway Works

13.225 This requires the applicant to enter into an agreement under s278 of the Highways Act 1980 with LBTH and TfL. The precise scope of these works is undefined in the obligation, but nonetheless, in principle this is reasonable and would meet the tests. Again, I am mindful of dispute resolution clauses within the deed should there be difficulties in this respect.

#### Monitoring Fees

13.226 Finally, clause 14 of the deed requires including an employment strategy statement a payment of £37,367.00 for monitoring purposes. This is in full accordance with the CIL regulations.

### Obligations Conclusions

13.227 I have set out above where the obligations meet the tests. I have also found that the obligations relating to the submission of an employment strategy statement and local employment and equal opportunities statement would not be reasonable.

13.228 Similar to conditions, should the SoS take a different view in terms of any of the obligations outlined above, the CIL Compliance Statement sets out commentary in respect of these and the reasons for the dispute between parties for consideration.

### ***Overall Planning Balance and Conclusion***

13.229 There is strong policy support for the proposals, as outlined above and throughout my analysis. In particular, it is supported by LP Policy SD4 in respect of enhancing and promoting the unique international, national and London wide role of the CAZ, including diplomatic organisations as a strategic function. Further support for the proposal is provided by the Opportunity Area, as per THLP policies S.SG1, S.SEMP1, and D.EMP2. The proposals also accord with a raft of other LP and THLP policies relating to heritage, design, transport, amenity and environmental policies.

13.230 Put simply, the proposed scheme is in accordance with the development plan when considered as a whole. The NPPF is clear that in such circumstances the development should be approved without delay.

13.231 Similarly, for the listed building consent application, the works would preserve the building and its special interest and thus should also be approved. This is uncontested [7.4].

13.232 However, I recognise that the SoS may, take a different view in terms of accordance with the development plan as a whole. The question of such compliance rests on whether the decision maker places more weight on the benefits of the scheme, or its drawbacks. Accordingly, I go through the benefits and the weight in which I ascribe to them, below. For consistency, I adopt the terms used by the applicant as limited, moderate, significant and substantial.

13.233 The site is derelict brownfield land and thus would attract **substantial** weight in accordance with NPPF paragraphs 124 and 125 [6.12].

13.234 The proposal would conserve and enhance nationally significant designated heritage assets and enhance their settings. It would enhance the character and appearance of the CA. The ToLWHS would also be enhanced. The setting of other assets, including Tower Bridge would be preserved. The NPPF states that great weight must be given to the conservation of assets at paragraph 212 and as such I give this **substantial** weight.

13.235 While LBTH and others identified low level less than substantial harm, in terms of archaeology, I consider that the significance would be better revealed. Thus, I also give this **substantial** weight.

13.236 The exemplary design also attracts **substantial** weight. This is in terms of the improvements to the existing poor-quality buildings within the site

as well as other wider improvements to the character and appearance of the area, including from the public realm including footway enhancements, planting, lighting, public artwork, signage and funding for an Urban Realm study which would improve the immediate site surroundings.

13.237 In terms of the broad use, the proposed development would support the strategic functions of the CAZ and would be located in a highly accessible location. These factors would attract **substantial** weight. The nature of the use is as such that it would also indirectly support local shops and businesses, although that is unquantified. The use is, however, unlikely to generate much employment opportunities, as discussed above. These benefits thus attract **limited** weight.

13.238 Finally, in respect of the specific proposed occupants giving rise to particular considerations, I agree with the applicant that the proposed development is of international importance and would enhance London's standing as an international city. The proposals would support diplomatic and trading relations with PRC [13.25.4]. However, mindful that the PRC already hold consular premises in London, the weight I attach to this is **moderate**.

13.239 Together, I consider the package of benefits would be significant and compelling.

13.240 Should the SoS give greater weight to the accepted policy conflicts in relation to tall buildings or amenity, or indeed, should the SoS take a different view on fundamental matters such as heritage, healthy and safe communities or highway safety, in undertaking a planning balance, the route through would be via the NPPF paragraph 11.

13.241 First, should any harm be found to heritage, that would trigger the balancing exercise in paragraph 215 against the public benefits.

13.242 Should public benefits not be found to outweigh any harm, in accordance with paragraph 11 of the NPPF, if the application of policies in the NPPF that protect assets of particular importance provides a strong reason for refusing the development proposed. It should be noted, however, that LBTH and HE GLAAS [11.14] found that any harm was outweighed by such public benefits of the HIC.

13.243 Second, paragraph 11 requires that any adverse impacts of granting permission should significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

13.244 To conclude, I am of the clear view that the proposal complies with the development plan when taken as a whole. There are no other material considerations which would warrant a conclusion other than that planning permission and listed building consent should be granted.

#### **14. Recommendation**

14.1 For the reasons set out above, I conclude that the applications for planning permission and listed building consent should be granted, subject to the attached conditions in Annex D and the relevant obligations under the s106 planning obligation.

*C Searson*

INSPECTOR

## **ANNEX A – APPEARANCES**

### **FOR LONDON BOROUGH OF TOWER HAMLETS**

Morag Ellis KC and Stephanie Bruce-Smith of Francis Taylor Building, instructed by Ian Austin, London Borough of Tower Hamlets

They called:

Mike Ibbott  
MA MPhil MBA MRTPI AIEMA

Consultant, TP Bennett

*Additional participants at the Conditions and Obligations Round Table Session:*

Ian Austin  
Gareth Gwynne

Principal Planning Solicitor  
West Area Planning Manager

### **FOR CHINESE EMBASSY IN THE UK**

Christopher Katkowski CBE KC of Kings Chambers, instructed by CMS Cameron McKenna Nabarro Olswang LLP

He called:

Oliver Ulmer  
Master of Architecture (Dipl.-Ing. (FH))

Director, David Chipperfield Architects

Dr Chris Miele  
IHBC MRTPI

Senior Partner, Montagu Evans LLP

Richard von Kalinowski-Meager  
BA MA PG Cert FSA FRSA MCIfA

Director – Heritage, RPS

Nick Aldworth  
MPA CSyP

Director, Risk to Resolution Ltd

Nina Quarshie  
BEng MSc MCIHT CMILT

Associate Transport Consulting, Arup  
Ltd

Chris Goddard  
BA (Hons) BPL, MRTPI, MRICS

Board Director, DP9 Ltd

*Additional participants at the Conditions and Obligations Round Table Session:*

Josh Risso-Gill  
Nicola Insley  
Nona Jones

Partner, CMS  
Counsel, CMS  
Associate, DP9

### **FOR METROPOLITAN POLICE SERVICE**

*Participants at the Round Table Session*

Jon Savell  
James Conway  
Freddie Mills  
Jonathan Boulton

Deputy Assistant Commissioner  
Chief Superintendent  
Sergeant  
Head of Estate Strategy & Engagement

## INTERESTED PERSONS

Simon Bell	Royal Mint Court Residents Association
Luke de Pulford	Inter-Parliamentary Alliance on China
Charles Streeten	Friends of St Katharine's Docks
Michael Polack	Royal Mint Tenant and Resident Association
Simon Cheng	Hongkongers in Britain
Councillor Peter Golds	London Borough of Tower Hamlets
Peiqing Ni	Chinese Dissent Network
Kit Chan	Wapping Residents
Andy Ng Siu-hong	Interested Party
Vivienne Xu	Local Resident
Zugang Long	PetroIneos Trading Ltd
Xu Ke	General Nuclear International Ltd
Yin Wang	China Chamber of Commerce in the UK
Peiting Liu	Local Resident
Mark Lahiff	Property Developer
Martin Collard	UK Bank of China

## ANNEX B: CORE DOCUMENTS

Core Documents can be accessed at: [Royal Mint Court - Chinese Embassy Core Documents](#)

A full list of the schedule can be found here: [RMC Core Documents Schedule.docx](#)

CD Ref	Title
CD 1	Planning Application Submission Documents
CD 2	Environmental Statement
CD 3	Other Documents
CD 4	Planning Application Consultation Responses
CD 5	Planning Policy Documents
CD 6	Other Material Considerations
CD 7	Updated Planning Application Documents
CD 8	Updated EIA Documents
CD 9	LBTH Documents
CD 10	RMCRA Documents
CD 11	Applicant Documents
CD 12	Representations to the Inquiry

## ANNEX C: DOCUMENTS SUBMITTED DURING THE INQUIRY

Inquiry Documents can be accessed at: [Chinese Embassy Inquiry Documents](#)

Ref	Description
INQ 1	Applicant's Opening Statement
INQ 2	Council's Opening Statement
INQ 3	Statement made on behalf of The Royal Mint Court Residents Association (Simon Bell)
3a	<i>Appendices</i>
INQ 4	Statement made on behalf of Inter-Parliamentary Alliance on China (Luke de Pulford)
INQ 5	Statement made on behalf of Friends of St Katharine's Docks (Charles Streeten)
INQ 6	Statement made on behalf of Royal Mint Court Tenant and Residents Association (Michael Polak)
6a	<i>Accompanying Video</i>
6b	<i>Accompanying Exhibits</i>
INQ 7	Statement made on behalf of Hongkongers in Britain (Simon Cheng)
INQ 8	Councillor Peter Golds Written Transcript
INQ 9	Peiqing Ni Written Transcript
INQ 10	Site Visit Itinerary
INQ 11	Architect Presentation
INQ 12	Archaeology Presentation
INQ 13	Applicant's Rebuttal Statement on Security
INQ 14	Draft s106 Agreement (superseded by INQ 30)
INQ 15	Kit Chan Written Transcript
15a	<i>Accompanying Map</i>
15b	<i>Accompanying Council Statement (7 Feb 2025)</i>
INQ 16	Andy Ng Siu-hong Written Transcript
INQ 17	Vivienne Xu Written Transcript
INQ 18	Zugang Long Written Transcript
INQ 19	Xu Ke Written Transcript
INQ 20	Yin Wang Written Transcript
INQ 21	Peitong Liu Written Transcript
INQ 22	Mark Lahiff Written Transcript
INQ 23	Martin Collard Written Transcript
INQ 24	Signed Statement of Common Ground
INQ 25	Applicant's Clarification Note (Transport)
INQ 26	Additional Site Visit Itinerary (Other London Embassies)
INQ 27	Council's Closing Statement
INQ 28	Applicant's Closing Statement
INQ 29	Applicant's Closing Statement Addendum
INQ 30	Final Draft S106 Obligation
INQ 31	Final Draft Conditions dated 14 March 2025
INQ32	Condition Schedule Justification Table
INQ33	CIL Compliance Statement
INQ34	Royal Mint Court Completed s106 1 May 2025

INQ35 Letter to PINS from Applicant regarding CCTV and Royal Mint Green Contributions

INQ36 Letter to PINS from LBTH in response to Applicant letter regarding CCTV and Royal Mint Green Contributions

## ANNEX D: SCHEDULES OF CONDITIONS

### *Listed Building Consent*

1. The works as approved by this listed building consent shall begin no later than three years from the date of this decision.
2. The works as approved by this listed building consent shall be carried out in accordance with the approved drawings listed below:

1510\_A\_B1-\_PD1\_09 Demolition basement floor plan - Johnson Smirke Building  
1510\_A\_B1-\_PD1\_10 Demolition ground floor plan - Johnson Smirke Building  
1510\_A\_B1-\_PD1\_11 Demolition first floor plan - Johnson Smirke Building  
1510\_A\_B1-\_PD1\_12 Demolition second floor plan - Johnson Smirke Building  
1510\_A\_B1-\_PD1\_13 Demolition third floor plan - Johnson Smirke Building  
1510\_A\_B1-\_PD1\_14 Demolition roof floor plan - Johnson Smirke Building  
1510\_A\_B1-\_PD6\_10 Demolition section CC - Johnson Smirke Building  
1510\_A\_B1-\_PD6\_11 Demolition North and South Elevation - Johnson Smirke Building  
1510\_A\_B1-\_PD7\_10 Demolition West and East Elevation - Johnson Smirke Building  
1510\_A\_B1-\_PD7\_11 Demolition section GG - Johnson Smirke Building  
1510\_A\_B2-\_PD1\_09 Demolition basement floor plan - Seaman's Registry Building  
1510\_A\_B2-\_PD1\_10 Demolition ground floor plan - Seaman's Registry Building  
1510\_A\_B2-\_PD1\_11 Demolition first floor plan - Seaman's Registry Building  
1510\_A\_B2-\_PD1\_12 Demolition second floor plan - Seaman's Registry Building  
1510\_A\_B2-\_PD1\_13 Demolition third floor plan - Seaman's Registry Building  
1510\_A\_B2-\_PD1\_14 Demolition fourth floor plan - Seaman's Registry Building  
1510\_A\_B2-\_PD1\_15 Demolition roof floor plan - Seaman's Registry Building  
1510\_A\_B2-\_PD6\_10 Demolition section AA - Seaman's Registry Building  
1510\_A\_B2-\_PD6\_11 Demolition section BB - Seaman's Registry Building  
1510\_A\_B2-\_PD6\_12 Demolition section CC - Seaman's Registry Building  
1510\_A\_B2-\_PD7\_10 Demolition elevations - West and North West - Seaman's Registry Building  
1510\_A\_B2-\_PD7\_11 Demolition elevations - North and South - Seaman's Registry Building  
1510\_A\_B2-\_PD7\_12 Demolition East elevation - Seaman's Registry Building  
1510\_A\_B4-\_PD7\_22 Demolition - north lodge  
1510\_A\_B4-\_PD7\_23 Demolition - south lodge  
1510\_A\_B1-\_P11\_09 Proposed basement floor plan - Johnson Smirke Building  
1510\_A\_B1-\_P11\_10 Proposed ground floor plan - Johnson Smirke Building  
1510\_A\_B1-\_P11\_11 Proposed first floor plan - Johnson Smirke Building  
1510\_A\_B1-\_P11\_12 Proposed second floor plan - Johnson Smirke Building  
1510\_A\_B1-\_P11\_13 Proposed third floor plan - Johnson Smirke Building  
1510\_A\_B1-\_P11\_14 Proposed roof floor plan - Johnson Smirke Building  
1510\_A\_B1-\_P16\_10 Proposed section CC - Johnson Smirke Building  
1510\_A\_B1-\_P16\_11 Proposed section GG - Johnson Smirke Building  
1510\_A\_B1-\_P16\_12 Proposed section CC - Johnson Smirke Building  
1510\_A\_B1-\_P17\_10 Proposed elevations - West and East - Johnson Smirke Building  
1510\_A\_B1-\_P17\_11 Proposed elevations - North and South - Johnson Smirke Building  
1510\_A\_B1-\_P17\_20 Proposed west elevation entrance - Johnson Smirke Building  
1510\_A\_B1-\_P17\_21 Proposed north elevation entrance - Johnson Smirke Building

1510\_A\_B1-\_P17\_22 Proposed south elevation entrance - Johnson Smirke Building  
1510\_A\_B1-\_P31\_00 Proposed sections - Secondary Glazing - Johnson Smirke Building  
1510\_A\_B2-\_P11\_09 Proposed basement floor plan - Seaman's Registry Building  
1510\_A\_B2-\_P11\_10 Proposed ground floor plan - Seaman's Registry Building  
1510\_A\_B2-\_P11\_11 Proposed first floor plan - Seaman's Registry Building  
1510\_A\_B2-\_P11\_12 Proposed second floor plan - Seaman's Registry Building  
1510\_A\_B2-\_P11\_13 Proposed third floor plan - Seaman's Registry Building  
1510\_A\_B2-\_P11\_14 Proposed fourth floor plan - Seaman's Registry Building  
1510\_A\_B2-\_P11\_15 Demolition roof floor plan - Seaman's Registry Building  
1510\_A\_B2-\_P16\_10 Proposed section AA - Seaman's Registry Building  
1510\_A\_B2-\_P16\_11 Proposed section BB - Seaman's Registry Building  
1510\_A\_B2-\_P16\_12 Proposed section CC - Seaman's Registry Building  
1510\_A\_B2-\_P16\_20 Proposed section BB - Seaman's Registry Building  
1510\_A\_B2-\_P17\_10 Proposed elevations - West and North West - Seaman's Registry Building  
1510\_A\_B2-\_P17\_11 Proposed elevations - North and South - Seaman's Registry Building  
1510\_A\_B2-\_P17\_12 Proposed East elevation - Seaman's Registry Building  
1510\_A\_B2-\_P17\_20 Proposed North elevation façade infill - Seaman's Registry Building  
1510\_A\_B2-\_P17\_21 Proposed South and East entrances - Seaman's Registry Building  
1510\_A\_B2-\_P31\_00 Proposed Secondary Glazing Section - Seaman's Registry Building  
1510\_A\_B2-\_P31\_01 Proposed West Elevation façade detail - Seaman's Registry Building  
1510\_A\_B4-\_17\_21 Proposed Elevation- Entrance Pavillion East and West - Masterplan  
1510\_A\_B4-\_17\_22 Proposed Elevation- Entrance Pavillion North and South Masterplan  
1510\_A\_B4-\_P11\_21 Proposed Ground Floor Plan - Entrance Pavillion - Masterplan  
1510\_A\_B4-\_P16\_21 Proposed Section FF - Entrance Pavillion - Masterplan  
1510\_A\_B4-\_P17\_23 Proposed Works - North Lodge  
1510\_A\_B4-\_P17\_24 Proposed Works - South Lodge  
1510\_A\_B4-\_PD1\_22 Proposed works - Lampposts  
1510\_A\_B4-\_PD7\_24 Proposed Works - Seaman's Registry Arch  
1510\_A\_B4-\_PD7\_25 Proposed Works - Front Railing

3. No works as approved by this listed building consent shall take place until details of a scheme to secure and protect existing historic features against accidental loss, damage, or theft during the execution of authorised works on site has been submitted to and approved in writing by the local planning authority. The approved scheme of protection shall be undertaken before any development as approved by this Listed Building Consent commences on site and shall be retained in situ unless otherwise agreed, until the development is complete.

No such features shall be disturbed or removed temporarily or permanently without the prior approval in writing of the Council, in accordance with relevant Historic England guidance.

4. No works as approved by this listed building consent shall take place until a specification of building works, recording and analysis; the making of a

detailed record; and a watching brief during the works affecting the historic fabric has been submitted to and approved in writing by the Local Planning Authority.

5. No works as approved by this listed building consent shall take place until samples (to be provided on-site) and full particulars of all external and internal facing materials to be used in the construction of the development have been submitted to and approved in writing by the Local Planning Authority.

Details submitted pursuant to this condition shall include but are not restricted to:

- a. Detailed method statements for all internal and external works including works of making good, prepared by a suitably qualified and experienced heritage construction/renovation professional.
- b. Details of all internal works and samples of any new or replacement fabric. Drawings shall be at a scale of no less than 1:5.
- c. Samples and details of external cladding. Details of external cladding, where relevant, shall include all types of brick or other cladding material to be used, details of bond, mortar and pointing for brick and details of joints, panel sizes and fixing method for other types of cladding.
- d. Samples and drawings of fenestration. Details of fenestration, where relevant, shall include reveals, sills and lintels. Drawings shall be at a scale of no less than 1:5.
- e. Drawings and details of entrances. Details of entrances, where relevant, shall include doors, reveals, canopies, signage, entry control, post boxes, CCTV, lighting and soffit finishes. Drawings shall be at a scale of no less than 1:5.
- f. Samples and details of roofing.
- g. Details of any balconies, terraces or wintergardens and associated balustrades, soffits and drainage.
- h. Details of any external rainwater goods, flues, grilles, louvres and vents.
- i. Details of any external plant, plant enclosures and safety balustrades.

The works as approved by this listed building consent shall not be carried out other than in accordance with the approved details.

6. During the works approved by this listed building consent, if hidden historic features are revealed they should be retained in-situ. Works shall be halted in the relevant area of the listed building and the Local Planning Authority should be notified immediately.

*Planning Permission*

1. The development shall begin no later than three years from the date of this decision.
2. The development shall be carried out in accordance with the approved drawings listed below:

1510_A_B4-_11_05	Location Plan - Proposed Scheme
1510_A_B4-_11_08	Site Plan - Proposed Scheme
1510_A_B1-_PD1_09	Demolition basement floor plan - Johnson Smirke building
1510_A_B1-_PD1_10	Demolition ground floor plan - Johnson Smirke building
1510_A_B1-_PD1_11	Demolition first floor plan - Johnson Smirke building
1510_A_B1-_PD1_12	Demolition second floor plan - Johnson Smirke building
1510_A_B1-_PD1_13	Demolition third floor plan - Johnson Smirke building
1510_A_B1-_PD1_14	Demolition roof floor plan - Johnson Smirke building
1510_A_B1-_PD6_10	Demolition section CC - Johnson Smirke building
1510_A_B1-_PD6_11	Demolition North and South Elevation - Johnson Smirke Building
1510_A_B1-_PD7_10	Demolition West and East Elevation - Johnson Smirke Building
1510_A_B1-_PD7_11	Demolition section GG - Johnson Smirke building
1510_A_B2-_PD1_09	Demolition basement floor plan - Seaman's Registry building
1510_A_B2-_PD1_10	Demolition ground floor plan - Seaman's Registry building
1510_A_B2-_PD1_11	Demolition first floor plan - Seaman's Registry building
1510_A_B2-_PD1_12	Demolition second floor plan - Seaman's Registry building
1510_A_B2-_PD1_13	Demolition third floor plan - Seaman's Registry building
1510_A_B2-_PD1_14	Demolition fourth floor plan - Seaman's Registry building
1510_A_B2-_PD1_15	Demolition roof floor plan - Seaman's Registry building
1510_A_B2-_PD6_10	Demolition section AA - Seaman's Registry building
1510_A_B2-_PD6_11	Demolition section BB - Seaman's Registry building
1510_A_B2-_PD6_12	Demolition section CC - Seaman's Registry building
1510_A_B2-_PD7_10	Demolition elevations - West and North West - Seaman's Registry Buildings
1510_A_B2-_PD7_11	Demolition elevations - North and South - Seaman's Registry Buildings
1510_A_B2-_PD7_12	Demolition East elevation - Seaman's Registry Buildings
1510_A_B3AB_D1_08	Demolition basement floor plan - Murray and Dexter House North - Sheet 1 of 2
1510_A_B3AB_D1_09	Demolition basement floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01
1510_A_B3AB_D1_10	Demolition basement floor plan - Murray and Dexter House Mezzanine North - Sheet 1 of 2
1510_A_B3AB_D1_11	Demolition basement floor plan - Murray and Dexter House South - Sheet 2 of 2
1510_A_B3AB_D1_12	Demolition ground floor plan - Murray and Dexter House North - Sheet 1 of 2
1510_A_B3AB_D1_13	Demolition ground floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01
1510_A_B3AB_D1_14	Demolition first floor plan - Murray and Dexter House North - Sheet 1 of 2
1510_A_B3AB_D1_15	Demolition first floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01
1510_A_B3AB_D1_16	Demolition second floor plan - Murray and Dexter House South - Sheet 1 of 2

1510_A_B3AB_D1_17	Demolition second floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01
1510_A_B3AB_D1_18	Demolition third floor plan - Murray and Dexter House north - Sheet 1 of 2
1510_A_B3AB_D1_19	Demolition third floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01
1510_A_B3AB_D1_20	Demolition fourth floor plan - Murray and Dexter House North - Sheet 1 of 2
1510_A_B3AB_D1_21	Demolition fourth floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01
1510_A_B3AB_D1_22	Demolition fifth floor plan - Murray and Dexter House North - Sheet 1 of 2
1510_A_B3AB_D1_23	Demolition fifth floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01
1510_A_B3AB_D1_24	Demolition sixth floor plan - Murray and Dexter House North - Sheet 1 of 2
1510_A_B3AB_D1_25	Demolition sixth floor plan - Murray and Dexter House South - Sheet 2 of 2 Rev 01
1510_A_B3AB_D1_26	Demolition roof floor plan - Murray and Dexter House North - Sheet 1 of 2
1510_A_B3AB_D1_27	Demolition roof floor plan - Murray and Dexter House South - Sheet 2 of 2
1510_A_B3ab_D6_10	Demolition section EE - Murray Dexter House
1510_A_B3ab_D6_11	Demolition section CC - Murray Dexter House
1510_A_B3ab_D6_12	Demolition section GG - Murray Dexter House - Sheet 1 of 2
1510_A_B3ab_D6_13	Demolition section GG - Murray Dexter House - Sheet 2 of 2
1510_A_B3ab_D7_10	Demolition elevation 1 - Murray Dexter House North
1510_A_B3ab_D7_11	Demolition elevation 2 - Murray Dexter House North
1510_A_B3ab_D7_12	Demolition elevation 3 - Murray Dexter House South
1510_A_B3ab_D7_13	Demolition elevation 4 - Murray Dexter House West
1510_A_B3ab_D7_14	Demolition elevation 3 - Murray Dexter House South
1510_A_B3ab_D7_15	Demolition elevation 4 - Murray Dexter House West
1510_A_B3ab_D7_16	Demolition elevation 7 - Murray Dexter House East - Sheet 1 of 2
1510_A_B3ab_D7_17	Demolition elevation 8 - Murray Dexter House East - Sheet 2 of 2
1510_A_B4-_D1_09	Demolition basement plan - Masterplan
1510_A_B4-_D1_10	Demolition ground floor plan - Masterplan
1510_A_B4-_D1_21	Demolition ground floor plan - Substation/entrance
1510_A_B4-_D7_10	Demolition - unfolded boundary wall
1510_A_B4-_D7_18	Demolition - subway station
1510_A_B4-_D7_19	Demolition - eastern boundary wall
1510_A_B4-_D7_21	Demolition elevations - Substation/entrance
1510_A_B4-_D7_22	Demolition elevations - masterplan
1510_A_B4-_PD7_22	Demolition - north lodge
1510_A_B4-_PD7_23	Demolition - south lodge
1510_A_B1-_P11_09	Proposed basement floor plan - Johnson Smirke building
1510_A_B1-_P11_10	Proposed ground floor plan - Johnson Smirke building
1510_A_B1-_P11_11	Proposed first floor plan - Johnson Smirke building
1510_A_B1-_P11_12	Proposed second floor plan - Johnson Smirke building
1510_A_B1-_P11_13	Proposed third floor plan - Johnson Smirke building
1510_A_B1-_P11_14	Proposed roof floor plan - Johnson Smirke building
1510_A_B1-_P16_10	Proposed section CC - Johnson Smirke building
1510_A_B1-_P16_11	Proposed section GG - Johnson Smirke building
1510_A_B1-_P16_12	Proposed section CC - Johnson Smirke building

1510_A_B1-_P17_10	Proposed elevations - West and East - Johnson Smirke Building
1510_A_B1-_P17_11	Proposed elevations - North and South - Johnson Smirke Building
1510_A_B1-_P17_20	Proposed west elevation entrance - Johnson Smirke Building
1510_A_B1-_P17_21	Proposed north elevation entrance - Johnson Smirke Building
1510_A_B1-_P17_22	Proposed south elevation entrance - Johnson Smirke Building
1510_A_B1-_P31_00	Proposed sections - Secondary Glazing - Johnson Smirke Building
1510_A_B2-_P11_09	Proposed basement floor plan - Seaman's Registry building
1510_A_B2-_P11_10	Proposed ground floor plan - Seaman's Registry building
1510_A_B2-_P11_11	Proposed first floor plan - Seaman's Registry building
1510_A_B2-_P11_12	Proposed second floor plan - Seaman's Registry building
1510_A_B2-_P11_13	Proposed third floor plan - Seaman's Registry building
1510_A_B2-_P11_14	Proposed fourth floor plan - Seaman's Registry building
1510_A_B2-_P11_15	Demolition roof floor plan - Seaman's Registry building
1510_A_B2-_P16_10	Proposed section AA - Seaman's Registry building
1510_A_B2-_P16_11	Proposed section BB - Seaman's Registry building
1510_A_B2-_P16_12	Proposed section CC - Seaman's Registry building
1510_A_B2-_P16_20	Proposed section BB - Seaman's Registry building
1510_A_B2-_P17_10	Proposed elevations - West and North West - Seaman's Registry Buildings
1510_A_B2-_P17_11	Proposed elevations - North and South - Seaman's Registry Buildings
1510_A_B2-_P17_12	Proposed East elevation - Seaman's Registry Buildings
1510_A_B2-_P17_20	Proposed North elevation façade infill - Seaman's Registry Building
1510_A_B2-_P17_21	Proposed South and East entrances - Seaman's Registry Building
1510_A_B2-_P31_00	Proposed Secondary Glazing Section - Seaman's Registry Building
1510_A_B2-_P31_01	Proposed West Elevation façade detail - Seaman's Registry Building
1510_A_B3A_11_09	Proposed Basement Plan - Cultural Exchange Building
1510_A_B3A_11_10	Proposed Ground Floor Plan - Cultural Exchange Building
1510_A_B3A_11_11	Proposed First Floor Plan - Cultural Exchange Building
1510_A_B3A_11_12	Proposed Second Floor Plan - Cultural Exchange Building
1510_A_B3A_11_13	Proposed Third Floor Plan - Cultural Exchange Building
1510_A_B3A_11_14	Proposed Fourth Floor Plan - Cultural Exchange Building
1510_A_B3A_11_15	Proposed Fifth Floor Plan - Cultural Exchange Building
1510_A_B3A_11_16	Proposed Sixth Floor Plan - Cultural Exchange Building
1510_A_B3A_11_17	Proposed Roof Floor Plan - Cultural Exchange Building
1510_A_B3a_16_10	Section EE - Cultural Exchange Building
1510_A_B3a_16_11	Section CC - Cultural Exchange Building
1510_A_B3a_17_10	Proposed West Elevation - Cultural Exchange Building
1510_A_B3a_17_11	Proposed North Elevation - Cultural Exchange Building
1510_A_B3a_17_12	Proposed East Elevation - Cultural Exchange Building
1510_A_B3a_17_13	Proposed South Elevation - Cultural Exchange Building
1510_A_B3a_31_00	Proposed Façade Details 1 - Cultural Exchange Building
1510_A_B3a_31_01	Proposed Façade Details 2 - Cultural Exchange Building
1510_A_B3a_31_02	Proposed Details - Ground Floor Canopy - Cultural Exchange Building
1510_A_B3a_31_03	Proposed Details - Entrance Canopy - Cultural Exchange Building

1510_A_B3a_31_05	Proposed Details - Typical Floor Façade - Cultural Exchange Building
1510_A_B3a_31_06	Proposed Details - The Crown - Cultural Exchange Building
1510_A_B3a_31_11	Proposed Details - Ground Floor Columns - Cultural Exchange Building
1510_A_B3a_31_12	Proposed Plinth Details - Cultural Exchange Building
1510_A_B3a_31_13	Proposed Entrance Lobby - Cultural Exchange Building
1510_A_B3a_31_14	Proposed Exhibition Interior - Cultural Exchange Building
1510_A_B3a_31_15	Proposed Entrance Lobby - Cultural Exchange Building
1510_A_B3a_31_16	Proposed Canopy Roof - Cultural Exchange Building
1510_A_B3a_31_18	Proposed Decorative Tile Detailing - Cultural Exchange Building
1510_A_B3b_11_08	Proposed Basement Plan - Embassy House North - Sheet 1 of 2 Rev 01
1510_A_B3b_11_09	Proposed Basement Plan - Embassy House South - Sheet 2 of 2 Rev 01
1510_A_B3b_11_10	Proposed Ground Floor Plan - Embassy House North - Sheet 1 of 2 Rev 01
1510_A_B3b_11_11	Proposed Ground Floor Plan - Embassy House South - Sheet 2 of 2 Rev 01
1510_A_B3b_11_12	Proposed First Floor Plan - Embassy House North - Sheet 1 of 2 Rev 01
1510_A_B3b_11_13	Proposed First Floor Plan - Embassy House South - Sheet 2 of 2 Rev 01
1510_A_B3b_11_14	Proposed Second Floor Plan - Embassy House North - Sheet 1 of 2 Rev 01
1510_A_B3b_11_15	Proposed Second Floor Plan - Embassy House South - Sheet 2 of 2 Rev 01
1510_A_B3b_11_16	Proposed Third Floor Plan - Embassy House North - Sheet 1 of 2 Rev 01
1510_A_B3b_11_17	Proposed Third Floor Plan - Embassy House South - Sheet 2 of 2 Rev 01
1510_A_B3b_11_18	Proposed Third Floor Plan - Embassy House South - Sheet 2 of 2 Rev 01
1510_A_B3b_11_19	Proposed Fourth Floor Plan - Embassy House South - Sheet 2 of 2 Rev 01
1510_A_B3b_11_20	Proposed Fourth Floor Plan - Embassy House North - Sheet 1 of 2 Rev 01
1510_A_B3b_11_21	Proposed Fifth Floor Plan - Embassy House South - Sheet 2 of 2 Rev 01
1510_A_B3b_11_22	Proposed Fifth Floor Plan - Embassy House North - Sheet 1 of 2 Rev 02
1510_A_B3b_11_23	Proposed Sixth Floor Plan - Embassy House South - Sheet 2 of 2 Rev 02
1510_A_B3b_11_24	Proposed Sixth Floor Plan - Embassy House North - Sheet 1 of 2 Rev 02
1510_A_B3b_11_25	Proposed Seventh Floor Plan - Embassy House South - Sheet 2 of 2 Rev 02
1510_A_B3b_11_26	Proposed Roof Floor Plan - Embassy House North - Sheet 1 of 2 Rev 02
1510_A_B3b_11_27	Proposed Roof Floor Plan - Embassy House South - Sheet 2 of 2 Rev 02
1510_A_B3b_21_11	Proposed unit flat layouts - Embassy House Rev 02
1510_A_B3b_21_12	Proposed unit flat layouts - Embassy House Rev 02
1510_A_B3b_16_10	Proposed Sections AA, BB and FF - Embassy House Rev 01
1510_A_B3b_16_11	Proposed Sections BB - Embassy House

1510_A_B3b_17_10	Proposed Elevations - East and West - Embassy House Rev 01
1510_A_B3b_17_11	Proposed Elevations - North and South - Embassy House
1510_A_B3b_31_00	Proposed Façade Details - Embassy House
1510_A_B3b_31_01	Proposed Façade Details - Embassy House
1510_A_B3b_31_02	Proposed Façade Details - Embassy House
1510_A_B3b_31_03	Proposed Façade Details - Embassy House
1510_A_B4-11_09	Proposed Basement Plan – Masterplan Rev 01
1510_A_B4-11_10	Proposed Ground Floor Plan – Masterplan Rev 01
1510_A_B4-11_11	Proposed Roof Plan – Masterplan Rev 02
1510_A_B4-11_12	Proposed Paving Plan – Masterplan Rev 01
1510_A_B4-11_19	Proposed Works - Cartwright Street Entrance - Masterplan
1510_A_B4-16_10	Proposed Section AA - Masterplan
1510_A_B4-16_11	Proposed Section BB - Masterplan
1510_A_B4-16_12	Proposed Section CC - Masterplan
1510_A_B4-16_13	Proposed Section DD - Masterplan
1510_A_B4-16_14	Proposed Section EE – Masterplan Rev 01
1510_A_B4-16_21	Proposed Section FF GG - Masterplan
1510_A_B4-17_11	Proposed South Elevation - Masterplan
1510_A_B4-17_12	Proposed West Elevation - Masterplan
1510_A_B4-17_13	Proposed North Elevation - Masterplan
1510_A_B4-17_18	Proposed Elevation- Subway Staircase
1510_A_B4-17_19	Proposed Elevation- Eastern Boundary Wall
1510_A_B4-17_21	Proposed Elevation- Entrance Pavilion East and West - Masterplan
1510_A_B4-17_22	Proposed Elevation- Entrance Pavilion North and South Masterplan
1510_A_B4-17_23	Proposed Site Entrances - Masterplan
1510_A_B4_31_01	Proposed Detail Sections - Cultural Exchange Square - Masterplan
1510_A_B4-P11_21	Proposed Ground Floor Plan - Entrance Pavilion - Masterplan
1510_A_B4-P16_21	Proposed Section FF - Entrance Pavilion - Masterplan
1510_A_B4-P17_23	Proposed Works – North Lodge
1510_A_B4-P17_24	Proposed Works - South Lodge
1510_A_B4-PD1_22	Proposed works - Lampposts
1510_A_B4-PD7_24	Proposed Works - Seaman's Registry Arch
1510_A_B4-PD7_25	Proposed Works - Front Railing

3. Unless otherwise specified by a S61 Consent granted under the Control of Pollution Act 1974, demolition, building, engineering or other operations associated with the construction of the development (including arrival, departure and loading and unloading of construction vehicles):

- Shall be carried out in accordance with the Tower Hamlets Code of Construction Practice.
- Shall only be carried out within the hours of 08:00 and 18:00 Monday to Friday. No works shall take place on Saturdays, Sundays and Public Holidays.
- Ground-borne vibration shall not exceed 1.0mm/s Peak Particle Velocity (PPV) at residential and 3.0mm/s PPV at commercial properties neighbouring the site.
- Noise levels measured 1 metre from the façade of any occupied building neighbouring the site shall not exceed 75dB(A) at residential and commercial properties, and 65dB(A) at schools and hospitals

(LAeq,T where T = 10 hours Monday to Friday and 5 hours for Saturday.

4. No piling shall take place until a Piling Method Statement (detailing the depth, location and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority.

The development shall not be carried out other than in accordance with the approved details.

5. All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall not exceed the emission standards set out in the Mayor of London's 'Control of Dust and Emissions During Construction and Demolition' Supplementary Planning Guidance (SPG) 2014. Unless it complies with the above standards, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority.

An inventory of all Non-Road Mobile Machinery (NRMM) must be kept on site during the course of the demolition, site preparation and construction phases of the development, and must be registered on the online register at <https://nrmm.london/>. All machinery should be regularly serviced and service logs kept on site for inspection. Records of emission limits for all equipment should be kept on site. This documentation should be made available to local authority officers as required until the completion of the development.

6. No development shall take place, including any works of demolition, until a Construction Environmental Management & Logistics Plan has been submitted to and approved in writing by the Local Planning Authority.

The Plan shall aim to minimise the amenity, environmental and road network impacts of the demolition and construction activities and include the details of:

- a. Telephone, email and postal address of the site manager and details of complaints procedures for members of the public;
- b. Measures to maintain the site in a tidy condition in terms of disposal/storage of waste and storage of construction plant and materials;
- c. Scheme for recycling/disposition of waste resulting from demolition and construction works;
- d. Ingress and egress to and from the site for vehicles;
- e. Safeguarding of buried services;
- f. Proposed numbers and timing of vehicle movements through the day and the proposed access routes, delivery scheduling, use of holding areas, logistics and consolidation centres;
- g. Parking of vehicles for site operatives and visitors;

- h. Travel Plan for construction workers;
- i. Construction lighting and timings of such, not to unduly impact on neighbouring amenity;
- j. Location and size of site offices, welfare and toilet facilities;
- k. Erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- l. Measures to ensure that pedestrian access past the site is safe and not obstructed;
- m. Measures to minimise risks to pedestrians and cyclists, including but not restricted to accreditation of the Fleet Operator Recognition Scheme (FORS) and use of banksmen for supervision of vehicular ingress and egress.
- n. Mitigation and monitoring measures for Spills and Pollution Prevention, Noise and Vibration and Air Quality;
- o. A feasibility survey, which shall be carried out to consider the potential for moving demolition and construction material from the site by waterborne freight.

The development shall not be carried out other than in accordance with the approved details.

7. Prior to the commencement of development, a Dust Management Plan (DMP), based on an Air Quality and Dust Risk Assessment (AQDRA), shall be submitted to and approved, in writing, by the local planning authority. The DMP shall be in accordance with The Control of Dust and Emissions during Construction and Demolition SPG 2014. The DMP will need to detail the measures to reduce the impacts during the construction phase. The development shall be undertaken in accordance with the approved plan.

During each four construction sub-phases of the proposed development (demolition, earthworks, construction, and trackout), PM10 continuous monitoring shall be carried out on site. Parameters to be monitored, duration, locations and monitoring techniques must be approved in writing by the London Borough of Tower Hamlets prior to commencement of monitoring.

8. No works shall take place (save for demolition works, site preparation, erection of fencing, laying of or provision of any services, laying of temporary surfaces and erection of temporary site buildings for construction purposes) until a remediation scheme to deal with the potential ground contamination of the site has been submitted to and approved in writing by the local planning authority.

- a. Based on the Arup Ground Contamination Risk Assessment and Outline Remediation strategy report dated June 2021, A supplementary site investigation scheme, including groundwater monitoring is required to be submitted, to provide an updated detailed assessment of the risk to all receptors that may be affected, including those off site;
- b. The results of the site investigation and detailed risk assessment referred to in (ii) and based on these an options appraisal and

- remediation strategy giving full details of the remediation and mitigation measures required and how they are to be undertaken;
- c. A verification plan setting out the details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (iii.) are complete to a satisfactory standard; and
- d. A monitoring and maintenance plan, setting out provisions for long-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. The contamination remediation works shall be carried out in accordance with the approved details and completed prior to the first occupation of the development. The provisions of the monitoring and maintenance plan shall be in force from the first occupation of the development and retained for its lifetime.

If during the works any additional contamination is encountered, all works in the relevant part of the site shall cease immediately and not resume until either:

- i. The potential contamination has been assessed and a remediation scheme has been submitted to and approved in writing by the Local Planning Authority, or
- ii. Timescales for submission of a remediation scheme and details of works which may be carried out in the interim have been agreed in writing by the Local Planning Authority.

Any additional land contamination shall be fully remediated prior to the first occupation of the development.

The development shall not be occupied until a verification report, produced post completion of the remediation works, that includes results of sampling and monitoring carried out, has first been submitted to and approved in writing by the local planning authority demonstrating that the site remediation criteria have been met.

9. No demolition or development shall take place until a Written Scheme of Investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

Details of construction control measures to protect unexcavated buried archaeological remains to be preserved in-situ.

The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

10. No plant, water tanks, water tank enclosures, air conditioning units or other structures that are not shown on the approved plans shall be erected upon the roofs of the buildings hereby permitted, unless otherwise approved in writing by the Local Planning Authority.

11. Any mechanical plant and equipment within the development shall be designed and maintained for the lifetime of the development so that the rating level of noise does not exceed the typical measured background noise level (LA90, T) without the plant in operation as measured one metre from the nearest affected window of a habitable room in the nearest affected residential property. The rating level of the plant noise and the background noise level shall be determined using the methods from the version of BS 4142 current at the time of the granting planning permission.

Vibration from the plant hereby approved (when assessed as per advice of the version of BS 6472 current at the time granting of the planning permission) in the centre of any habitable room shall cause vibration no higher than the values equivalent to "low probability of adverse comment" in accordance with BS6472 'Evaluation of Human Exposure to Vibration in Buildings';

No mechanical plant or equipment shall be operated within the site until a post installation verification report, including acoustic test results, has first been submitted to and approved in writing by the Local Planning Authority confirming that the above maximum noise standard has been achieved and that the mitigation measures are robust.

12. No development shall take place until all of the trees within the site and all trees that overhang from adjoining land save for any trees explicitly identified for felling on approved drawings, have been protected in accordance with British Standard 5837 – 'Trees in relation to Construction Sites'

The tree protection measures shall be retained in place for the duration of the construction works and during this period no works other than landscaping works shall be carried out or materials stored within the protected areas underneath the trees.

13. No superstructure works shall take place until an Arboricultural Method Statement and a Tree Planting Methodology in line with BS 8545 are submitted to and approved in writing by the Local Planning Authority.

All planting locations should be chosen to mitigate the amenity impact any tree removals will have on the surrounding area and should also consider post development pressures, such as excessive shade and litter once fully established. A process for planting and maintaining young trees that will result in them successfully establishing in the landscape must be described.

All trees should be planted as a minimum stock size of Semi Mature in line with BS 3936. Tree species will preferably be native to the UK and of a

suitable size, shape and form to allow them to reach their intended proportions without significant or regular pruning.

A strategy for how trees within and outside the development redline will be protected during construction and detailing any specialist engineering solutions and methodologies for works close to trees.

If any protected tree on the site dies or is damaged as a result of the construction process, suitable mitigation will be agreed with the Local Planning Authority, which will meet the mitigation planting requirements outlined above as a minimum.

14. All removal of trees, hedgerows, shrubs, scrub or tall herbaceous vegetation shall be undertaken between September and February inclusive.

If this is not possible then a suitably qualified ecologist shall carry out any inspection of the areas concerned immediately prior to the clearance works (preferably within 5 days) to ensure that no nesting or nest-building birds are present. If any nesting birds are present then the vegetation around the nest shall not be removed until an ecologist confirms that the birds have finished nesting.

If no nesting birds are found, there is no need to report the survey findings to the Council before clearance of vegetation. Once the site has been cleared, details of measures taken to ensure no nesting birds were harmed shall be subsequently submitted to and approved in writing by the Local Planning Authority. This could be that the site has been cleared between the months of September and February; that a survey has been undertaken and no nests were found; or that nests were found, protection measures put in place around the nest(s), and a subsequent survey found that birds were no longer nesting.

15. Prior to commencement of landscaping works within each phase, full details of biodiversity mitigation and enhancements shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity enhancements shall include but not be limited to the following:

- a. biodiverse roofs designed in accordance with 'Creating Green Roofs for Invertebrates' best practice guide by Buglife - details provided should include the location and total area of biodiverse roofs, substrate depth and type, planting including any vegetated mat or blanket (though sedum mats should be avoided if possible) and any additional habitats to be provided such as piles of stones or logs;
- b. landscaping to include a good diversity of nectar-rich plants to provide food for bumblebees and other pollinators for as much of the year as possible - details should include species list and planting plans;
- c. climbing plants, in the event of the use of pergolas as part of detailed landscape design in locations not affixed to building facade, including ivy, honeysuckle and jasmine, to provide a further source of nectar and cover for nesting birds such as house sparrows - details to include species and locations of climbers; details to include species and locations of climbers;

- d. water areas designed to provide good wildlife habitat and planted exclusively with native aquatic and wetland species - details to include planting plans, substrate type, depth profile and any features designed to enhance habitat;
- e. external lighting designed in accordance with best practice guidance on bats and lighting published by the Institute of Lighting Professionals, to minimise the light spill onto areas likely to be used by foraging bats - details to include diagrams of existing and proposed light levels across the site;
- f. bat boxes, insect boxes and nest boxes for appropriate bird species such as house sparrow, swift and black redstart - details should include number, locations and type of boxes;
- g. Ecological Management Plan to support long term maintenance and habitat creation;
- h. details of maintenance provisions for all of the above.

The biodiversity improvement measures shall be completed in accordance with the approved details during the first planting season following practical completion of each phase of the development and retained and maintained in accordance with the approved maintenance provisions for the lifetime of the development.

16. No superstructure works shall take place until a landscaping scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of:

- a. Hard landscaping, including palette of high quality, sustainable and inclusive public realm materials including planter enclosures, accessibility features, drainage, kerbs, size and location of permeable and impermeable paving surfaces;
- b. Accessibility and inclusivity, including ground levels, gradients, thresholds and inclusive access provisions, characteristics and features which signal open and public access and belonging, without cues to keep away, or cues of private use;
- c. Soft landscaping, including urban greening integrated through the site including, but not limited to green roofs, green walls, ground surface planting and nature based sustainable urban drainage features integrated with the site design and designed for multiple benefits including recreation, biodiverse habitat and resilience, amelioration of heat and rain events, noise and air quality;
- d. A Landscape Management Plan for lifetime maintenance, giving details of proactive maintenance, including watering provision for soft landscape, appropriate pest control measures not resulting in harm to the planting, monitoring, and remediation to avoid major infestations or damage by non-chemical interventions, ensuring all drainage features fully remain operational, and provide schedules and measures to maintain or improve biodiversity as shown in the Urban Greening Factor details;
- e. Street furniture, including street furniture palette demonstrating contribution to the area's character and supporting infrastructure for active travel, external cycle parking stands, benches, litter bins for separated collection allowing recycling, ash trays, informal and

- dedicated seating areas, signage and wayfinding measures including Legible London signage, and any other street furniture;
- f. Boundary treatments including number, location, materials and surface finishes and colours of all bollards, fences, gates, railings, walls and other access control measures and means of enclosure;
- g. Environmental measures to make landscape conducive, provisions for use during weather events and other microclimatic considerations such as wind, heavy rain, and heat: shade, shelter and areas of direct sunlight, where possible,;
- h. Public art locations, fixings and materials including surface finishes and colours;
- i. Urban Greening Factor (UGF) and Biodiversity Net Gain (BNG) tables, with a target UGF of 0.3 being secured.

The landscaping scheme shall be completed in accordance with the approved details no later than during the first planting season following practical completion of the development and retained for the lifetime of the development.

Any trees or shrubs which die, are removed or become seriously damaged or diseased following the completion of the landscaping works shall be replaced in the next planting season with the same species or an approved alternative as agreed in writing by the Local Planning Authority.

17. Prior to first occupation of the ancillary residential accommodation, evidence shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that either:

- a. All water network upgrades required to accommodate the additional demand to serve the development have been completed; or
- b. A development and infrastructure phasing plan has been prepared in consultation with Thames Water to allow additional development to be occupied.

Where a development and infrastructure phasing plan is agreed no occupation of the ancillary residential accommodation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

18. The development shall be carried out strictly in accordance with the approved Flood Risk Assessment and Outline Drainage Strategy (by Arup dated June 2024).

19. The proposed development shall be implemented in accordance with the details included within the approved Fire Statement for the lifetime of the development unless otherwise approved in writing by the Local Planning Authority or Health and Safety Executive.

20. Prior to commencement of superstructure works, an overheating strategy for the development shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the GLA.

The approved strategy shall be implemented prior to first occupation of the development and maintained on site. The strategy shall include details of the following for each of the buildings:

- a. Passive measures included in the design and provided by the developer to mitigate against overheating including, but not limited to, floor to ceiling heights of at least 2500mm in living areas in accordance with London Housing Design Guide, internal blinds in bedrooms, glazing g-value of 0.65 or below, and openable windows (with appropriate provision for security on lower floors).
- b. Details of measures that would be installed to prevent overheating in common areas with communal heating pipework in line with objective 3.9 of CIBSE CP1.
- c. Details of any management strategies required to control overheating and information that will be supplied to occupants to support the strategy.
- d. Dynamic modelling, in line with CIBSE TM59, shall be carried out to demonstrate that the measures installed are appropriate to control overheating without the need for mechanical cooling.

21. No development shall take place until a detailed Operational Waste Management Strategy in line with the submitted Circular Economy Statement (Cundall, November 2024) and GLA's Circular Economy Statement Guidance is submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so approved.

Within 3 months of occupation, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials.

22. The deliveries and servicing of the approved uses shall not take place otherwise in accordance with the approved Deliveries and Servicing Plan (Arup, June 2024).

Deliveries and servicing shall take place only within the following hours: 8am - 6pm Monday to Friday, 8am - 1pm Saturdays. No deliveries or servicing shall take place on Sundays or Bank Holidays.

23. No part of the site shall be occupied until 84 car parking spaces have been installed and ready for use in accordance with the approved drawing 1510\_A\_B4-\_11\_09. Such spaces shall be retained thereafter and shall not be used for any other purpose.

24. 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 and shall not be used for any other purpose..

25. Prior to completion of superstructure works, details of the security measures to the undercroft of St. Mary Grace's Court shall be submitted to and approved in writing by the Local Planning Authority. Such measures shall be retained thereafter.

26. Prior to completion of superstructure works, full details of the design and location of hostile vehicle mitigation measures to the rear of the site shall be submitted to and approved in writing by the Local Planning Authority. Such measures shall be retained thereafter.

27. No superstructure works shall take place until samples (to be provided on-site) and full specification of all external facing materials to be used in the construction of the development shall be submitted to and approved in writing by the Local Planning Authority.

Details submitted pursuant to this condition shall include but are not restricted to:

- a. Mock-up panels of no less than 1m by 1m of each external cladding material. Details of external cladding, where relevant, shall include all types of brick or other cladding material to be used, details of bond, mortar and pointing for brick and details of joints, panel sizes and fixing method for other types of cladding. If an off-site manufactured cladding system is to be used, full details of the system shall be provided and the mock-up panel shall include at least one junction between pre-assembled panels.
- b. Samples and drawings of fenestration. Details of fenestration, where relevant, shall include reveals, sills and lintels. Drawings shall be at a scale of no less than 1:20.
- c. Drawings and details of entrances. Details of entrances, where relevant, shall include doors, reveals, canopies, signage, entry control, post boxes, CCTV, lighting and soffit finishes. Drawings shall be at a scale of no less than 1:20.
- d. Drawings and details of external facing servicing doors, entrances and access points. Drawings shall be at a scale of no less than 1:20.
- e. Details of any balconies, terraces or wintergardens and associated balustrades, soffits and drainage.
- f. Details of any external rainwater goods, flues, grilles, louvres and vents.
- g. Details of any external plant, plant enclosures and safety balustrades.

28. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking or re-enacting that order with or without modification), no fences, barriers, gates, bollards or other means of enclosure, save for those which comprise part of the development authorised under this planning permission, shall not be erected within the site following the practical completion of the development, unless otherwise approved in writing by the Local Planning Authority.

- 29.No new plumbing, pipes, soil stacks, flues, vent grilles, security alarms, wiring and cables or ductwork shall be fixed on the external faces of the building unless as otherwise shown on the drawings hereby approved, unless otherwise approved in writing by the Local Planning Authority.
- 30.Prior to installation, details of any aerials and satellite dishes required for free communication of official purposes under the Vienna Conventions shall be submitted and approved in writing by the Local Planning Authority.

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development (England) Order 2015 (or any Order revoking or re-enacting that principal Order with or without modification), no additional aerials, antennae, satellite dishes or related telecommunications equipment shall be erected on any part of the development hereby permitted, without planning permission first being obtained.

- 31.The ancillary residential units provided as part of the approved development shall be solely for the use of embassy staff and visitors to the embassy. They shall not be sold, leased, or rented to members of the general public.
- 32.The number of units of ancillary residential accommodation that can be used by visitors to the embassy shall not exceed 29, shall only be used as temporary sleeping accommodation and shall not be in use by the same occupiers for more than 90 consecutive day stays.
- 33.The development shall be carried out in accordance with the approved Energy Strategy (by Cundall dated November 2024) and Sustainability Statement (by Cundall dated November 2024). The energy efficiency and sustainability measures set out therein shall be completed prior to the first occupation of the development and retained for its lifetime.

The development shall achieve regulated carbon dioxide emission savings of no less than 50% against the Target Emissions Rate of Part L of Building Regulations (2021) (as amended).

The photovoltaic array system shall be installed prior to the first occupation of the development, have an output of no less than 107kWh and be retained for the lifetime of the development.

All buildings within the development shall achieve a BREEAM UK 2014 Refurbishment and Fit-out rating of 'excellent' or applicable equivalent international standard (including Chinese standards). Within 3 months of first occupation of the development the applicant shall submit the BREEAM certificates or equivalent documentation certified by the relevant awarding body.

The development shall not be occupied until a post completion verification report, including a microgeneration certificate relating to photovoltaic array system, has first been submitted to and approved in writing by the Local Planning Authority to confirm that the above minimum standards have

been achieved and that all of the approved energy efficiency and sustainability measures have been implemented.

34. Prior to the commencement of the development hereby permitted, full calculations for heating, cooling & ventilation; equipment data sheets & specifications of all filtration, deodorising systems; and a plan identifying the location of all associated termination points shall be submitted to and approved in writing by the Local Planning Authority. Particular attention shall be given to the discharge of toxic or odorous extract air where a high level of discharge is usually essential.

None of the units shall be occupied until the mechanical ventilation systems have been implemented in accordance with the approved details. The systems shall be retained and maintained in accordance with the approved details for the lifetime of the development.

35. Prior to the occupation of the development, an Events Management Plan (EMP) shall be submitted to and approved in writing by the Local Planning Authority.

The EMP must provide details relating to the control of vehicular and pedestrian operations at the application site and on adjacent highways in relation to the control of crowds in relation to a range of events of different scales. The plan must identify where a minimum of two parking spaces for police vehicles will be provided in consultation with TfL and LBTH adjacent to the application site.

The EMP shall provide for the establishment of steering group (consisting of key statutory authorities and local stakeholders) to inform the management of protests and other large events connected to the development. The key stakeholders should include but not be limited to: Transport for London, the Metropolitan Police, the Local Housing Association managing St Mary Grace's Court, Historic Royal Palaces and Tower Hamlet's Council Community Safety Division.

36. Prior to the completion of the first floor superstructure of the Cultural Exchange Building an Archaeological and Heritage Outreach and Interpretation Strategy (AHOIS) shall be submitted to the Local Planning Authority. The AHOIS shall be agreed in writing by the Local Planning Authority a minimum of six months prior to the commencement of the Embassy Use.

Prior to submission of the AHOIS the developer shall establish an Expert Steering Group comprised of representatives of interested authorities and bodies to advise in the production and future management of the AHOIS.

The submitted AHOIS shall:

- a. Provide full details as to how the public would be enabled to understand the history of the site, including:
  - (i) its use as a Cistercian Abbey;

- (ii) its use as a structured Black Death burial ground;
- (iii) its use as the Royal Navy's victualling yard;
- (iv) its use as the Royal Mint.

- b. Provide details of a strategy for arranging the display at the Heritage Interpretation Centre of historic material connected to the site.
- c. Provide details of the operational plan of the Heritage Interpretation Centre.

37. The Heritage Interpretation Centre shall be open to members of the public from 10am-4pm Monday-Saturday, with later hours one Wednesday per calendar month opening until 7pm on reasonable occasions and will close on public holidays.

Entrance shall be without charge or incurrence of a booking fee.

Exclusive group booking openings (to serve the needs of local schools, community groups, local history groups and archaeology groups) shall be provided between 10am and 2pm each Wednesday. If such Wednesday group booking openings are not taken up by aforementioned groups, this booking period shall be released for general booking by the public on reasonable occasions and will close on public holidays.

Members of the public shall be able to book a visit in advance, or attend on an ad hoc basis, should spaces remain available.

Individuals seeking to make a booking shall be required to provide a lead name and email address only. Attendees on the day shall be granted access without the requirement for personal information.



# Ministry of Housing, Communities & Local Government

[www.gov.uk/mhclg](http://www.gov.uk/mhclg)

## RIGHT TO CHALLENGE THE DECISION IN THE HIGH COURT

These notes are provided for guidance only and apply only to challenges under the legislation specified. If you require further advice on making any High Court challenge, or making an application for Judicial Review, you should consult a solicitor or other advisor or contact the Crown Office at the Royal Courts of Justice, King's Bench Division, Strand, London, WC2 2LL (0207 947 6000).

The attached decision is final unless it is successfully challenged in the Courts. The Secretary of State cannot amend or interpret the decision. It may be redetermined by the Secretary of State only if the decision is quashed by the Courts. However, if it is redetermined, it does not necessarily follow that the original decision will be reversed.

## SECTION 1: PLANNING APPEALS AND CALLED-IN PLANNING APPLICATIONS

The decision may be challenged by making an application for permission to the High Court under section 288 of the Town and Country Planning Act 1990 (the TCP Act).

### Challenges under Section 288 of the TCP Act

With the permission of the High Court under section 288 of the TCP Act, decisions on called-in applications under section 77 of the TCP Act (planning), appeals under section 78 (planning) may be challenged. Any person aggrieved by the decision may question the validity of the decision on the grounds that it is not within the powers of the Act or that any of the relevant requirements have not been complied with in relation to the decision. An application for leave under this section must be made within six weeks from the day after the date of the decision.

## SECTION 2: ENFORCEMENT APPEALS

### Challenges under Section 289 of the TCP Act

Decisions on recovered enforcement appeals under all grounds can be challenged under section 289 of the TCP Act. To challenge the enforcement decision, permission must first be obtained from the Court. If the Court does not consider that there is an arguable case, it may refuse permission. Application for leave to make a challenge must be received by the Administrative Court within 28 days of the decision, unless the Court extends this period.

## SECTION 3: AWARDS OF COSTS

A challenge to the decision on an application for an award of costs which is connected with a decision under section 77 or 78 of the TCP Act can be made under section 288 of the TCP Act if permission of the High Court is granted.

## SECTION 4: INSPECTION OF DOCUMENTS

Where an inquiry or hearing has been held any person who is entitled to be notified of the decision has a statutory right to view the documents, photographs and plans listed in the appendix to the Inspector's report of the inquiry or hearing within 6 weeks of the day after the date of the decision. If you are such a person and you wish to view the documents you should get in touch with the office at the address from which the decision was issued, as shown on the letterhead on the decision letter, quoting the reference number and stating the day and time you wish to visit. At least 3 days notice should be given, if possible.