

ADDRESS: Site bounded by Worship Street, Curtain Road, Scrutton Street and Holywell Row, EC2A	
WARD: Hoxton East and Shoreditch	REPORT AUTHOR: Nick Bovaird
APPLICATION NUMBER: 2024/2201 (planning permission) and 2024/2162 (Listed Building Consent)	VALID DATE: 6 March 2025
DRAWING NUMBERS: 2024/2201 (Planning Application): Site Location Plan, PA-011 Rev P00, PA-012 Rev P02 Proposed Site Location Plan, PA-013 Rev P02, PA-0019 Rev P03, PA-0021 Rev P03, PA-0022 Rev P03, PA-0023 Rev P03, PA-0024 Rev P03, PA-0025 Rev P03, PA-0026 Rev P03, PA-0049 Rev P03, PA-0050 Rev P03, PA-0051 Rev P03, PA-0052 Rev P03, PA-0053 Rev P03, PA-0054 Rev P03, PA-0055 Rev P03, PA-0056 Rev P03, PA-0098 Rev P04, PA-0099 Rev P04, PA-0100 Rev P04, PA-0100M Rev P04, PA-0101 Rev P04, PA-0101M Rev P04, PA-0102 Rev P04, PA-0103 Rev P04, PA-0104 Rev P04, PA-0105 Rev P04, PA-0106 Rev P04, PA-0107 Rev P04, PA-0108 Rev P04, PA-0109 Rev P04, PA-0110 Rev P04, PA-0111 Rev P04, PA-0112 Rev P04, PA-0113 Rev P04, PA-0114 Rev P04, PA-0115 Rev P04, PA-0116 Rev P04, PA-0117 Rev P04, PA-0120 Rev P05, PA-0200 Rev P03, PA-0201 Rev P02, PA-0202 Rev P02, PA-0250 Rev P03, PA-0251 Rev P03, PA-0252 Rev P03, PA-0253 Rev P03, PA-0254 Rev P03, PA-0500 Rev P02, PA-0501 Rev P01, PA-0502 Rev P01, PA-0601 Rev P01, PA-0602 Rev P01, PA-A009 Rev P03, PA-A010 Rev P03, PA-A011 Rev P03, PA-A012 Rev P03, PA-A013 Rev P03, PA-A014	

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SK-001 Rev P00, SK-002 Rev P00 (Holywell Mansions), SK-002 Rev P00 (Webb Mews), SK-003 Rev P00, 0710372-HLEA-ZZ-RF-GA-CS-100020 P03 by Hoare Lea,

Planning Statement September 2025 by Montague Evans, Design and Access Statement by KPF,

Environmental Statement and Environmental Impact Assessment Technical Appendices October 2024 by Trium, Environmental Statement Addendum and Environmental Impact Assessment Addendum Technical Appendices August 2025 by Trium,

HTVIA October 2024 by Montague Evans, Additional Townscape Views August 2025 by Montague Evans,

Affordable Workplace Strategy by Linea, Affordable Workplace Strategy Addendum Update by Linea,

Child Friendly Impact Assessment November 2024 by Montague Evans,

Financial Viability Assessment 3 October 2024 by Montague Evans,

Financial Viability Assessment Addendum 3 September 2025 by Montague Evans,

Groundwater Risk Memo by WSP, Contaminated Land Preliminary Risk Assessment October 2024 by WSP, Development, Leasing & Market Assessment July 2024 by Kaufmans, Development, Leasing & Market Assessment Addendum September 2025 by Kaufmans, Arboricultural Development Statement September 2024 by CBA Trees,

Operational Management Plan September 2024, Urban Room Summary of Use and Activities November 2024,

Gateway One Planning Statement Fire Engineering September 2024 by Hoare Lea, London Plan Fire Safety Statement Rev04 06 August 2025 by Hoare Lea, Response to HSE 'Re: LPA PLANNING REF 2024/2201, 25-0834' dated 20 November 2025 by Hoare Lea.

Structural Survey For 91 – 105 Worship Street 26 June 2024 by WSP,

Construction Site Waste & Traffic Management Plan June 2024 by TCCL, Outline Delivery and Servicing Plan August 2025 by WSP, Framework Travel Plan August 2025 by WSP, Transport Assessment August 2025 by WSP, Waste Management Strategy August 2025 by WSP, Stopping Up - Technical Note 27 November 2025 by WSP,

Sustainability Strategy Rev06 31 August 2025 by Hoare Lea, Stage 2 Report Whole Life Carbon Report Rev 08 31 August 2025, Stage 2 Report Circular Economy Statement Rev 08 31 August 2025, TM52 Overheating Assessment Rev01 20 January 2024 by Hoare Lea, Shoreditch – LBH Sustainability Comments Hoare Lea Response, Applicant Response and Clarifications (received 9 January 2026), 0710372-HLEA-A-01-GA-CS-050091-District-Heating, 0710372-HLEA-ZZ-RF-GA-CS-100020 P03, Circular Economy Templates, Whole Life Carbon Templates, BRUKL Output Documents, Carbon Emission Reporting Templates, Part L Compliance Reports, Input Data Summaries by Elmhurst Energy,

Ecological Appraisal August 2025 by Trium, Biodiversity Net Gain Report Issue B by Assystem,

Air Quality Positive Statement dated 25 July 2025 by Logika Group, MEP Engineering Ventilation Statement Rev06 06 August 2025 by Hoare Lea,

Re: Shoreditch Works - Supplementary Daylight and Sunlight Planning Note dated 15/08/2025 by GIA,

<p>Internal Daylight, Sunlight and Overshadowing Report dated 20 September 2024 by GIA, , Internal Daylight and Sunlight 28 August 2025 by GIA,</p> <p>Key Definitions and Stakeholders November 2024, Statement of Community Involvement, Area Schedule, Scheme Areas- Retention Areas,</p> <p>Flood Risk Assessment and Outline Drainage Strategy August 2025 by WSP, FRA & ODS Addendum Note 26 November 2025 by WPS, Technical Note 002</p> <p>Response to Drainage Team Queries 18 July 2025 by WSP,</p> <p>Response to LBH Public Health Team Comments by Montague Evans, GLA Further Stage 1 Comments Tracker Revised Verso Submission November 2025,</p> <p>Health Impact Assessment Update 2 September 2025 by Montague Evans,</p> <p>2024/2162: (Listed Building Consent)</p> <p>PA15, PA16, H029 Rev B, H030, H031, H032, H033, H034, H035 Rev A, H036, H042, H043, H044, H045, H046 Rev B, H047, H048, H069, H070, H071, H072, H073, H074, H075 Rev A, H076, H099 Rev A, H100, H101, H102, H103, H104, H150 Rev A, H151, H201, H202, H203 Rev A, H204 Rev A, H250 Rev B, H251 Rev A, H252,</p> <p>Design and Access and Heritage Statement August 2024 by Richard Griffiths Architects,</p> <p>Structural Survey For 91 – 105 Worship Street 26 June 2024 by WSP</p>	
<p>AGENT: Montagu Evans LLP, 70 St Mary Axe, London, EC3A 8BE</p>	<p>APPLICANT: Linea Properties Limited, c/o Agent.</p>
<p>PROPOSAL: 2024/2201: Redevelopment of the majority of an urban block by demolition and part demolition of existing buildings to facilitate an office-led, mixed use development by the erection of 6 buildings with maximum heights of between six and 18 storeys (plus two storeys of plant) plus basements, the erection of a terrace mews of 6 buildings of two storeys, and the refurbishment and/or extension of Nos.26-24 Holywell Row, Nos.42-46 Scrutton Street and Nos.87-105 Worship Street; in order to provide 65448sqm of office (Use Class E), 4075sqm of retail floorspace (Use Class E), 78 residential units (Use Class C3) uses), an 770sqm Urban Room (Sui Generis), together with creation of a new central courtyard and pedestrian routes through the site, hard and soft landscaping and other associated and ancillary works (in</p>	

association with Listed Building Consent 2024/2162). [Description for the purposes of consultation only]. This application is accompanied by an Environmental Impact Assessment.

2024/2162: Listed Building Consent for internal and external works, including the demolition of later rear additions at 91-101 Worship Street to facilitate use as dwelling houses; Internal and external works to 103-105 Worship Street including the demolition of later rear additions, to provide a residential unit at the upper floors of 103 Worship Street and a ground floor commercial unit, and to facilitate the continued commercial and residential use of 105 Worship Street; New hard and soft landscaping, and other associated and ancillary works (in association with Planning Permission 2024/2201)

POST SUBMISSION REVISIONS:

- The removal of a cantilevered section of the Verso tower and a top storey of plant. Submission of amended documents to describe the change.

RECOMMENDATION SUMMARY:

Refuse planning permission and listed building consent, subject to referral to the Greater London Authority.

REASON FOR REFERRAL TO PLANNING SUB-COMMITTEE:

Major application

Yes

Substantial level of objections received

No

ANALYSIS INFORMATION

ZONING DESIGNATION:

(Yes)

(No)

CPZ	Yes	
Conservation Area	South Shoreditch	
Listed Building (Statutory)	Yes (Grade II*)	
Listed Building (Local)	Yes	
Priority Employment Area	Yes	

LAND USE:	Use Class	Use Description	Floorspace Sqm (GIA)
Existing	E (Office)	Non-Residential	23848
	E (Flexible/Retail)	Non-Residential	1626
	C3	Residential	2335
	<i>Total</i>		<i>27810</i>

Proposed	E (Office)	Non-Residential	65448
	E (Flexible/Retail)	Non-Residential	4075
	C3	Residential	8083
	Sui Generis	Non-Residential	770
	<i>Total</i>		<i>78375</i>

RESIDENTIAL USE DETAILS:	No. of Bedrooms per Unit					Totals
Type	Studio	1	2	3	4+	
Existing						
Private	20 (52.6%)	5 (13.1%)	6 (15.7%)	5 (13.1%)	2 (5.2%)	38
Proposed						
Private	5	22	18	1	5	51 (65.4%)
Social rent	5	4	6	1		16 (20.5%)
Intermediate		5	6	0		11 (14.1%)
Totals	10 (12.8%)	31 (39.7%)	30 (38.5%)	2 (2.6%)	5 (6.4%)	78

PARKING DETAILS:	Parking Spaces (General)	Parking Spaces (Disabled)	Bicycle storage
Existing	0	0	0
Proposed	0	9 (On-Street)	136 Residential (incl 11 for visitors) 817 Commercial (incl 215 for visitors)

CASE OFFICER'S REPORT

1.0

SITE CONTEXT

- 1.1 The site includes the majority of one of an urban block in Shoreditch. It is bounded by Curtain Road to the east, Worship Street to the south and Holywell Lane and Scrutton Street to the north-west. The building heights on the site range from 3-6 storeys and there are a number of rear yards serving various buildings in the block. There are currently a mix of uses on site with offices, residential, retail and community uses.
- 1.2 The site's east and south edges form part of the clearly defined character boundary between the City and Shoreditch. To the east of the site, outside the South Shoreditch Conservation Area, are the mixed use developments Principal Place and The Stage, both of which have tall residential towers and large mid rise office buildings. To the south are large office buildings within the City of London, with the city cluster further to the south. To the north and west the conservation area townscape is characterised by low-mid rise buildings in a mixture of commercial and residential uses.
- 1.3 The edges of the site comprise fine grained and public-facing buildings. Owing to bomb damage, the site has a lower concentration of typically Shoreditch 19th century buildings and a higher concentration of post-war buildings than is typical of the conservation area as a whole. The post war and older buildings share a 'Shoreditch grain' which is defined by a 19th Century commercial scale and typify the history of Shoreditch as a manufacturing hub from its beginnings, through its 19th century peak and its final post war years before the service industry took over.
- 1.4 The core of the site contains buildings of all ages that do not have a public face and are either historic manufacturing buildings or sheds. Unlike other large blocks in Shoreditch, this one has no pedestrian through routes and diversions around the site. The core of the site has some large yards on the former sites of large 19th century manufacturing sheds which would have been connected to showrooms facing the surrounding streets.
- 1.5 The site has the maximum Public Transport Accessibility (PTAL) level of 6b. It is within the Shoreditch Priority Office Area, the Central Activities Zone and the City Fringe Opportunity Area.

2.0 Conservation Implications

- 2.1 The site is located within the South Shoreditch Conservation Area and contains a number of listed buildings, locally listed buildings and buildings identified as buildings of townscape merit in the South Shoreditch Conservation Area Appraisal.
- 2.2 The following heritage assets are located within or immediately adjacent to the site.
 - 91-101, Worship Street EC2- Grade II*
 - 103 and 105, Worship Street EC2- Grade II
 - 24 and 26, Curtain Road EC2- Grade II
 - 14-21 Holywell Row- Locally Listed
 - 24-27 Holywell Row- Locally Listed
 - 13-21 Curtain Road (Hackney)- Locally Listed
 - Clifton House, 75-77 Worship Street (Hackney)- Locally Listed

- 2.3 The site is within the Shoreditch Archaeological Priority Area and is adjacent to 'The Stage' development where new development has been built above the remains of Shakespeare's Curtain Theatre.

3. Planning History

- 3.1 The full planning history of the site is available online and, for the sake of clarity, this section details only the most relevant planning applications, which are the following:

3.2 *58-62 Scrutton Street*

2022/1500: Replacement of windows and doors to street elevations; replacement of gates on Scrutton Street; alteration to access arrangement; installation of roof terrace; erection of new lift overrun; and other associated elevational and courtyard alterations.

Granted and LBC 2025/2010 approved, demonstrating commencement.

3.3 *54 - 56 Scrutton Street*

Flats A, B, D, E and F in 54 Scrutton Street were granted separate Existing Use Lawful Development Certificates in 2011 and 2012.

SOUTH/29/94/CON: Demolition of outbuilding at rear in connection with conversion of front building to residential accommodation.

Granted.

3x dismissed appeals for change of use from retail: 2018/0663 (to restaurant), 2023/0935 (to shisha lounge) and 2024/1470 (to shisha lounge).

3.4 *52 Scrutton Street*

Flats A-C were granted separate Existing Use Lawful Development Certificates in 2011 and 2012.

2010/2335: Retention of Hot food Take Away (A5 Use Class) at ground floor level.
Granted.

3.5 *48 - 50 Scrutton Street*

2015/4523: Replacement doors and glazing to ground floor elevation on Scrutton Street.

Granted

3.6 *44-46 Scrutton Street*

2002/1691: Change of use of second floor from Class B1 use (office) to a Live/Work unit (one bedroom) for a temporary period of 10 years.

Refused

3.7 *40-42 Scrutton Street*

SOUTH/218/97/FP: use of second floor as a live/work unit

Granted

2016/4330: Change of use of the second floor from a live/work unit (Sui Generis) to an office (use class B1).

Granted

3.8 *32-38 Scrutton Street*

2022/0178: Lawful Development Certificate (Existing) for rear extension work.

Granted

2022/0185: An application for a Certificate of Lawful Development to confirm the existing lawful use of the site falls within Class E(a) to the property located at Roma Building, 32-38 Scrutton Street, Hackney, London, EC2A 4RQ

Granted

2022/0189: Works undertaken to extend the premises known as 'Ground Floor Front' in 2015 have become lawful through the passage of time.

Granted

2004/1486: Erection of part single part two storey rooftop extension to provide additional (1342.6sqm) class B1 (business) floorspace.

Granted

2013/4182: Installation of two single storey metal containers on stilts at first floor level above existing car park and associated staircase for storage use (use class B8).

Granted

3.9 *26 Holywell Row*

2012/3043: Demolition of existing rear addition and rear wall. Erection of a part single part two storey rear extension and external alterations of the existing building to provide a 3-bed dwelling.

Granted

2013/2064: Non material amendment of planning permission reference 2012/3043 to erect a rear roof terrace.

Refused

3.10 *24 Holywell Row*

2010/3200: Certificate of Lawfulness for use of the property as 2 self-contained residential units.

Granted

2013/2465: Erection of two storey rear extension at first and second floor level; retention of existing first floor roof terrace and creation of additional roof terrace at third floor level; installation of new windows and French doors to rear elevation.

Granted

3.11 *87 Worship Street*

2001/0425: Alterations and refurbishment of office building including new entrance doorway, glazing and gate to rear building; replacement of 1st floor level and single storey extension and demolition of steel-frame enclosure at 1st floor level.

Granted

2019/1741: Partial demolition and conversion and alteration to the existing single storey structure to provide office (use class B1) with communal terrace at 1st floor level.

Granted

3.12 *89 Worship Street*

2019/3843: Erection of a single storey third floor rear extension, creation of a roof terrace and access stair and installation of new glazing to ground floor front elevation.

Granted

3.13 *91 Worship Street*

SOUTH/363/96/CLU: Certificate of lawfulness for use for class a3 purposes (sandwich bar)

Granted

3.14 *97 Worship Street*

2023/2962 and 2023/2963 (Listed Building Consent): First Second And Third Floor Flat repair works to the flat roofs and glazed roof of the café; repair the cast iron rainwater goods; repair the front door and installation of window; install cast iron airbricks to the rear of the building, repair works to chimneys and install cowls to chimney.

3.15 *99-101 Worship Street*

2019/4432 (Listed Building Consent): Repair works to the flat roofs and glazed roof of the café; repair the cast iron rainwater goods; repair the front door and installation of window; install cast iron airbricks to the rear of the building; repair works to chimneys and install cowls to chimney, installation of fire alarm system; proposed changes to internal layout and asbestos removal.

Granted

3.16 *103 Worship Street*

2025/2392 (Listed Building Consent): Internal alterations comprising the removal of existing non-structural internal partitions, installation of a new toilet on the ground floor, creation of a new kitchen on the second floor, new flooring.

In Progress

2024/0461 and 2024/0462 (Listed Building Consent): Amalgamation of two commercial units.

Granted

2023/1704: Change of Use of the upper floors from Use Class E (Commercial Business and Service) to Use Class C3 (Dwellinghouses) for the creation of 4 no. residential units, external alterations to rear windows and shopfront.

Refused

2022/2880 (2023/0139 Listed Building Consent), 2023/1704 (2023/1781 Listed Building Consent): Change of Use of the upper floors from Use Class E (Commercial Business and Service) to Use Class C3 (Dwellinghouses) for the creation of 4 no. residential units, external alterations to rear windows and shopfront.

Refused and Appeal APP/U5360/Y/23/3330377 was dismissed.

2010/1361 and 2010/1362 (Listed Building Consent): Change of use from offices (Use Class B1(a)) to non-residential education and training centre (Use Class D1).

Granted

3.17 7 Curtain Road

SOUTH/467/00/FP: External alterations on curtain road elevation.

Granted

SOUTH/911/99/FP: *Use of ground floor for class b1 business purposes.*

Granted

SOUTH/506/99/FP: Insertion of new windows on the north elevation at ground 1st & 2nd floors. Refurbished entrance to curtain road.

Granted

3.18 9-11 Curtain Road

SOUTH/2/00/FP: Change of use to class B1 business and/or class D1 education

Granted

SOUTH/448/00/FP: Internal & external alterations.

Granted

3.19 13-21 Curtain Road

2024/0822: Erection of cycle storage shed.

Granted

2018/4194: Erection of a temporary office building and the installation of new cycle parking stands within the rear courtyard and alterations including installation gates to the courtyard, demolition of the existing WC extension and erection of a new,

enlarged WC, shower and changing facility, and replacement of the windows to the two storey building at the rear of the site.

Granted

SOUTH/197/97/FP: Use of basement and ground floor for a3 (food and drink) purposes

Granted

3.20 *23 Curtain Road*

2008/1482: Existing use of the building as offices (Class B1 use).

Granted

3.21 *25-27 Curtain Road*

2014/4137: Change of use from office/storage and distribution (B1/B8) to use as a multi-purpose office/gallery/cafe/venue space (sui generis) for a temporary period of 2 years; alterations to shopfront; alterations to front elevation windows at first and second floor level; installation of escape stair to rear elevation.

Granted

2009/1595: Demolition of existing building and construction of a 6 storey building to provide 480sqm of commercial floor space (B1 office use) within the basement at ground floor and first floor and residential above (4 x 1 bed, 2 x 2 bed and 2 x 3 bed)

Granted

3.22 **Enforcement History:**

3.23 2022/0224/ENF: Use of 54 Scrutton Street as Shisha lounge without permission.

Case closed when Shisha lounge closed, April 2025.

3.24 2021/0347/ENF: Replacement of timber fencing with 1.1 metre black metal vertical railings lower in height, moving of a ground floor roof light and erection of timber fencing to house new roof light, and two ground floor windows. One to the rear with obscure glazing and at high level, and one to the side is also at high level and unopenable.

Case closed as not expedient to take action, February 2024

3.25 **Appeal History:**

3.26 *54-56 Scrutton Street*

APP/U5360/W/24/3352542: Change of use from retail (app 2024/1470) to shisha lounge).

Appeal Dismissed

APP/U5360/W/23/3333340: Change of use from retail (app 2023/0935) to shisha lounge).

Appeal Dismissed

W/18/3214034: Change of use from retail (app 2018/0663) to restaurant),
Appeal Dismissed

3.27 *103 Worship Street*

APP/U5360/W/23/3330357: 'Change of use of the upper floors of 103 Worship Street from Use Class E (Commercial, Business and Service) and Class D1 (Pilates/Studio) to Use Class C3 (Dwellinghouse) for the creation of 4 no. residential units. Retention of commercial use at ground floor level. External alterations to rear windows.'

Appeal Dismissed.

4.0 Consultation

4.1 Date Statutory Consultation Period Started: 28 November 2025

Officer note: This is the second consultation, the original consultation started on 21 March 2025.

4.2 Date Statutory Consultation Period Ended: 19 December 2025

4.3 Site Notices: Yes (for first consultation).

4.4 Press Advert: Yes (for first consultation).

4.5 Neighbours

562 neighbour notification letters were sent, 10 site notices were erected (5x planning permission and 5x LBC) and a press notice was published. To date (15 January 2026) the application has received 61 letters of support, including one from Cllr Anna Sizer and one from the Shoreditch Trust, and 3 letters of objection.

The letters of *support* were submitted on the following grounds:

- The project is well designed in terms of architecture, density and public spaces and is an improvement on the existing urban block.
- The September amendment to the design of the Verso tower has improved it.
- The design is sustainable, in terms of embodied carbon, green jobs and social sustainability.
- The proposal involves restoration and sensitive integration of the Grade II-listed Philip Webb buildings and shows a respectful approach to heritage, embedding historic assets into a contemporary masterplan.
- While supporting the principle of a tower, it should be taller and more elegant.
- Welcome a diverse mix of retail, office, residential and community uses.
- Welcome additional jobs to the area.
- The area needs regeneration.

- The collaborative and co-design-led process has engaged local practitioners throughout, creating an authentic sense of place and shared authorship that will resonate with the community it serves.
- The applicants have made extensive efforts to reach out to future users of the site, such as through the Meanwhile... in Shoreditch programme.
- Support the opening up of the middle of the site to the public.
- Agree with the restoration and re-use of the historic buildings on the site.
- Agree with the wide range of workspaces being proposed, in terms of size and specification, including Affordable Workspace.
- Support the social value commitments.
- Under GreenLabs, the Shoreditch Works Innovation Centre would provide affordable workspaces for businesses focused on sustainable innovation.
- The proposal offers a valuable opportunity to position Hackney as a leader in the transition to a more sustainable and regenerative economy.
- GoodPeople would be proactive in reaching out to unemployed residents.
- Entry-level job opportunities would be tied to long-term development routes rather than short-term placements.
- Support the elements of youth focused activity and employment/skills training.
- Cuts to funding of the Shoreditch Trust increase the importance of private sector partnerships. The cross-sector collaborative governance model that Shoreditch Works represents is a strong template for how progressive and inclusive development can be approached in the Borough.
- Support the programming of the Urban Room, which should include educational activities, skills workshops and maker demonstrations.
- The allocation of dedicated artist and maker studio spaces within the St James's Place building on Scrutton Street, the gallery/exhibition space on Worship Street and the Urban Room will provide infrastructure for emerging and established artists.
- Urban greening, open spaces, and programming focused on physical and mental health would contribute to a healthier environment for local families.
- The Urban Room's planned programme of events and networking opportunities, would serve as a conduit between the area's diverse groups of artists, researchers, entrepreneurs and established businesses, facilitating the knowledge exchange and unexpected collisions of ideas that drive innovation.
- Flexible workspace options across the development will allow companies to scale up without the disruption of relocation, maintaining their relationships and community connections.
- The on-site public realm would include bespoke street furniture, designed locally.
- The proposal's integration of technical infrastructure, collaborative spaces and amenities that appear well-designed for knowledge-intensive businesses.
- Thoughtfully designed spaces such as these can foster community, innovation, and sustainable practices.
- The proposal respects the fine-grained urban fabric that makes the area attractive to innovative businesses.

The letters of *objection* were submitted on the following grounds:

- The scheme represents over-development.
- The design of the Verso tower is bulky and domineering, in addition to being too tall for the conservation area.
- The proposed Holywell Mansions is out of scale with the existing character of the block.
- The proposals would negatively impact and harm the character of surrounding streets as well as the historic character of the South Shoreditch Conservation area.
- Impact on neighbouring amenity, including daylight/sunlight and overlooking of neighbouring residences, offices and roof terraces.
- The proposed roof terraces will cause significant overlooking of local residences and businesses.
- Impact on noise and local air pollution in operation, including servicing vehicles at anti-social hours.
- Impact of noise and air pollution during extended construction period on neighbouring residences and offices.
- Increased traffic congestion and parking stress.
- Servicing should not be undertaken via Holywell Row to access the dedicated new vehicular parking bay for deliveries and waste collection on Scrutton Street. Holywell Row is a narrow, single lane street, with reduced width pavements and a tight turn at the junction of Clifton Street and Holywell Row, which is one way. It is not adequate for servicing by HGVs and large vehicles or for such a large development.
- Impact on local infrastructure capacity, including water supply, sewage systems and electricity.
- The development should align with local policies and housing need in respect of Affordable Housing provision.
- The submitted daylight/sunlight report misidentifies rooms within existing buildings.
- The submitted daylight/sunlight report does not address neighbouring self-contained residential flats at no's 21 and 29 Holywell Row.
- Residents in the urban block were not informed of the scheme by the applicants prior to this application stage consultation by Hackney.

The issues raised in letters of support and objection are considered in the report that follows.

4.6 Statutory / Local Group Consultees

4.6.1 Greater London Authority (GLA) - Stage 1 Review:

Whilst the proposal is supported in principle, the application does not yet fully comply with the London Plan, as summarised below:

- Land Use Principles: The mixed-use development would align with the Central Activities Zone (CAZ) and City Fringe OA designations, as well as the draft site allocation and is supported.
- Affordable Housing: The proposal would deliver 29 affordable housing units (35% by habitable room), with a tenure split of 60% low-cost rent / 40% intermediate product. Subject to the Council appropriately securing the

affordable housing, the proposals may be eligible to follow the fast track viability route.

- Urban Design and Heritage: By way of its height and mass, the tall building would likely cause some visual and environmental impacts. The proposed development would cause less than substantial harm at a middle to high extent to the significance of the South Shoreditch Conservation Area and less than substantial harm ranging between a low to middle extent to listed buildings. This harm will be weighed against the public benefits at the Mayor's decision making stage.
- Transport: Further information is required on trip generation; car parking; cycle parking; and servicing arrangements. A £750,000 contribution is sought towards highway improvements, £250,000 towards upgrades to Shoreditch High Street station and £100,000 for safeguarding a cycle docking space. Prior to Stage 2 the Council should secure the improvements identified in the ATZ; cycle hire contribution; delivery and servicing plan; travel plans; and a construction logistics plan.
- Environment and sustainable infrastructure: Additional information is required on non-domestic Be Lean; heat network correspondence; heat network set up; PV; Be Seen; EUI; SHD and Circular Economy.

Officer's Note: The GLA have confirmed (12 November 2025) that the assessment of Heritage harm would not change as a result of the amended scheme. They have recommended a number of conditions that would need to be secured and these are in line with the recommendations of the report that follows. The GLA will undertake a final review of the submission at the point of its Stage 2 referral, following the decision by the Hackney Planning Sub Committee.

The GLA reference to the 'fast track route' in relation to Affordable Housing refers to the threshold approach in London Plan policy H5. In Hackney Local Plan policy LP13 has a 50% threshold for genuinely affordable housing which requires assessment of viability for all proposals that do not comply with the policy requirements. As such, fast tracking does not apply in this instance.

4.6.2 Historic England:

The application should be refused or withdrawn, unless the harm is considered to be outweighed by the public benefits of the application.

The South Shoreditch Conservation Area covers an important former industrial district associated with the furniture and printing trades. It has been described as a nationally important architectural legacy and one of the best-preserved Victorian manufacturing districts in London. The development site, which includes almost the whole of a large urban block, makes an important contribution to its significance. The site includes the grade II* listed 91-101 Worship Street, an important row of artisan dwellings designed by Philip Webb.

Proposals to redevelop the site, including a tall building and the erosion of the fine historic urban grain, would cause harm. The Verso building is entirely at odds with the long-established vision for the sensitive redevelopment of Shoreditch which is reflected in current and emerging Development Plan documents.

While we acknowledge the proposals would deliver heritage benefits through the restoration of 91-101 Worship Street, these are not sequenced to give full confidence about their delivery, and we do not consider that they would outweigh the heritage harm. We think it would be a shame for commercial uses to be lost on the ground floor of these buildings, although appreciate that their consistent repair and the reinstatement of the historic floor plans and interior detailing is a clear heritage benefit. If you are minded to approve these applications, we would strongly encourage you to ensure that an active frontage is secured and maintained here.

The site contains many historic buildings, and these generally make a strong positive contribution to the conservation area. A large proportion of the buildings on the site would be demolished – the post-war workshops and office buildings, all of which are identified in the conservation area appraisal as making a neutral contribution. We recognise that any harm from such demolition would therefore be limited, but where the construction of large buildings, which would dwarf the retained historic buildings, this would much reduce their positive contribution.

The proposals have been through many different iterations and each would cause significant harm to the conservation area. Design changes have resulted in some improvements, but have not reduced harm to a notable extent, principally because the Verso building remains tall and relatively broad. We would characterise the degree of harm to the conservation area as towards the middle of the range of 'less than substantial' in the language of the NPPF. It is not clear whether the site can sensitively accommodate the proposed quantum of development.

4.6.3 Hackney Society:

There is grave concern about the scale and density of the proposals, and the impact that these will have on the quality of both the new public realm, and private interiors, irrespective of the ambitions of urban greening, as well as the carbon implications. The sheer height of the Verso Building means that it cannot in any event constitute sustainable development, either in construction, servicing or maintenance. Hackney's first Regenerative Business Hub is unlikely to live up to its fanfare, at best meeting Hackney's unambitious policy for provision of 10% of affordable workspace, albeit alongside some potentially interesting public and communal spaces.

4.6.4 Historic England Archaeology (GLAAS):

The planning application lies in an area of archaeological interest and is a complex, multi-phase site, which has contained a burial ground since the 16th century, with this use continuing into the 17th, 18th and 19th centuries with the ultimate addition of a parish church.

We advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that we consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to

clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. A condition relating to piling should also be recommended.

It is understood from communications with the archaeological contractor that the remaining uncertainties to be addressed by the conditions are unable to be addressed prior to the site being made available for demolition. As such it is recommended that further evaluation is conducted, with an awareness that the results of this phase could necessitate further, extensive archaeological excavation. There may also be a need to reassess the design of foundations in order to preserve any nationally significant material.

4.6.5 Victorian Society:

Objection. Whilst the Society does not object to modest additions to the South Shoreditch Conservation Area, for example, the proposed no. 87-9 Worship Street, we do strongly object to the extent and some of the massing and scales of the proposed development of the broader development in the South Shoreditch Conservation Area, in particular, the “Verso Building.” Our concerns are outlined as follows:

1) As can be understood in Historic England’s guidance on Conservation Area Appraisals, designated Heritage Assets form a key aspect of a conservation Area’s distinct character, not just from the front elevation but also from the rear and other angles.

The Webb Terraces are six buildings of the mere 5,800 buildings listed in England and Wales as Grade II*. Only 5.8% of all listed buildings are listed at this high Grade. This means they are considered particularly important buildings of more than special interest, holding national significance. Invariably, then, they make a positive contribution to the South Shoreditch Conservation Area. Thus, erecting such a large-scale tower block (the Verso Building) directly behind would negatively impact not only the significance of the Terraces but also the Conservation Area, owing to their heightened importance as a Grade II* Asset.

The importance of the Worship Street Terraces on the Conservation Area, is also explicitly supported in the South Shoreditch Conservation Area Appraisal.

Additionally, two un-Listed Victorian buildings are proposed for significant alteration to accommodate the development: 3-21 Curtain Road and 52-58 Scrutton Street. As is outlined in HE guidance, ‘it will be important also to identify those unlisted buildings that make an important contribution to the character of the conservation area.’ In particular, 3-21 Curtain Road is a building of architectural merit, and will result in the complete loss of the significance of the non-designated heritage asset to accommodate the Verso Building.

The South Shoreditch Conservation Area Appraisal also highlights the typical height of buildings in the streetscape as being a maximum height of five storeys, again suggesting that the proposed Verso Building will not be conducive with the strict proportions of the Conservation Area: ‘Typically 3-5 storeys high with a strong vertical emphasis created by the architectural style of the buildings (see 4.2 above) which holds the eye when viewed obliquely’

2) The submitted renders do not accurately represent the full scale of the tower, either in isolation or in relation to its broader setting, as they do with all the other buildings in the development.

3) The applicants also made clear during the site visit that they would withhold the conservation of the Worship Street Workers' Terraces unless permission was granted for the larger development. The Society would take care to remind KPM that when they purchased the terraces, they legally became custodians of Listed Heritage Assets and have a responsibility to preserve its historical and architectural significance for future generations. This means taking care of the building's fabric, considering the impact of any proposed works, and ensuring that alterations or repairs are carried out in a way that preserves its unique character.

4) In addition, the retention of the live-work dynamic of Webb's original planform was of grave concern to the Committee. The relevant areas are ground and basement floors of the terrace, and the final remaining Webb workshop located to the rear of no. 97, on the site of a proposed new residential terrace.

4.6.6 Society for the Protection of Ancient Buildings:

Objection. The Grade II* listing of the Webb terrace recognises that it is a particularly important building of more than special interest. The terrace is part of Philip Webb's pioneering work in domestic design. The building's rarity and integrity, and its contribution to the character and appearance of the South Shoreditch Conservation Area, demands the highest standards of conservation and a rigorous approach to assessing any proposed changes.

We note that the applicant has considered the impact of the overall development on the Conservation Area; however, there is no assessment of the impact that the wider proposals would have on the historic terrace. The cumulative effect of the increasing mass of surrounding buildings and the impact of the proposed tall building on the historic asset must be assessed and any harm provided with clear and convincing justification.

While we acknowledge the potential benefits of conserving the terraces, we remain concerned that the application does not yet demonstrate a sufficiently thorough or consistent assessment of the heritage significance of the site as a whole. While the rear structures original to the Webb scheme have now been identified on the drawings and are represented with a higher level of significance, we remain disappointed that the proposals continue to include the demolition of these rare structures. Given their historic importance, we believe their removal would result in an unacceptable loss of heritage fabric.

We also question whether a full range of conservation-led alternatives has been explored, including options that retain and incorporate surviving historic fabric. The potential for mixed-use adaptation, retention of enclosed courtyards, and interpretation of Webb's original vision all warrant further consideration.

4.6.7 Health and Safety Executive Gateway One:

No Objection. The relevant high risk building is Holywell Mansions, a residential block of eight storeys.

HSE received a consultation request on 10/03/2025 for the planning application and responded on 31/03/2025, under the HSE reference pgo-6766, with the headline: 'Concern'. The concern was regarding the access arrangements and the arrangements for siting of the fire appliances for firefighting purposes within Rose Yard/Rose Walk.

HSE received a further consultation request on 10/09/2025 for the planning application and responded on 30/10/2025, under the HSE reference 25-0834, with the headline: 'Concern'. The concern maintained from the previous consultation.

HSE received a subsequent consultation request on 02/12/2025. For the avoidance of doubt, this substantive response is in relation to the additional and amended information included with this application, particularly the response document (LET-1922569-5A-JF-20251120-Response to HSE Comments-Rev00) from Hoare Lea dated 20/10/2025. The following clarification and information are noted as follows:

- Clarification of the access arrangements and the arrangements for siting of the fire appliances for firefighting purposes within Rose Yard/Rose Walk.
- Clarification of access road specifications and the outcomes of the vehicle tracking undertaken.

Following a review of the information provided in the planning application, the HSE is content with the fire safety design to the extent that it affects land use planning.

Officer's note: Fire safety, including that of the high risk building at Holywell Mansions, is considered in section 6.12 (paragraphs 4 onwards) of the assessment that follows.

4.6.8 London Fire Brigade:

No observations to make.

4.6.9 London Borough of Islington:

Objection. The Townscape Report mentions that no views were included as the ZTV "indicates lack of intervisibility". No evidence has been submitted, by way of Vu.City or similar to confirm that it would not be visible. Views 13 and 14 show some visibility from within Bunhill Fields, which, in oblique views, may constitute part of the backdrop as seen from within the Wesley Chapel vicinity. This has not been confirmed. The Council can therefore not give full assessment of the impact the proposal would have to the setting of this important heritage asset. The Council therefore objects to the proposal on the basis that no information to confirm impact to the setting of Wesley Chapel.

Similarly, the view from Finsbury Square is shown only as wireline. This information is not enough to appraise the impact it will have to the special character and appearance of Bunhill Fields and Finsbury Square Conservation Area.

Officer's Response: This objection is noted. This objection is noted. It was received late in the process, on 19 January 2026, after LBH had already considered the impacts on LB.Islington. The wireline in relation to Finsbury Square is sufficient, given that it is below the level of the existing building line. LBH officers also noted that there is no view of the Wesley's Chapel group included in the TVIA, but nonetheless consider that the assessment in the report that follows is sufficiently robust to allow a decision on this application, particularly given the nature of the recommendation.

4.6.10 London Borough of Tower Hamlets:

No objection. The London Borough of Hackney must consider whether the ES is considered to be adequate in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. London Borough of Hackney must consider whether further information is required in accordance with Regulation 25 of the EIA Regulations.

4.6.11 City of London:

No objection. In broad terms, the approach taken to the massing of the scheme and the disposition of height and bulk seems to us to be suitable for this large, inner-city site adjacent to the denser, hi-rise development characteristic of the nearby City fringe. We identify no impacts on heritage assets within the City of London or any of the pan-City views assessed in the TVIA, which accompanies the application.

We would note that the proposals entail a significant increase in the permeability of the site and its activation with a mix of different uses across the ground floor plane. We consider this to be a commendable approach.

4.6.12 National Health Service:

No objection. This scheme appears to result in a net increase of only 40 residential units so the impact on local health infrastructure will not be significant. We understand this is a commercial-led development which is unlikely to generate primary care or acute traffic.

4.6.13 Secured by Design Officer:

No objection. The applicants have met with DOCOs and our comments to them can be easily mitigated early if the Architects were to continue to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the recommended Secured by Design condition being applied. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.

4.6.14 Environment Agency:

No objection. We note that conditions should be added in respect of Non-Road Going Mobile Machinery (NRMM) and a BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. The development site appears to have been the subject of past industrial activity which poses a risk of pollution to controlled waters.

4.6.15 Natural England:

No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

4.6.16 London City Airport:

The proposal does not conflict with London City Airport's safeguarding criteria. However, we note that, as the proposed development exceeds 91.4m AGL, upon grant of permission, Hackney Council are required to notify the Civil Aviation Authority (CAA). Also, where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).

4.6.17 Thames Water:

No objection, subject to conditions in relation to a piling method statement, surface water drainage, foul water capacity, water network upgrades and construction within 5m of a water main

4.7 Council Departments

4.7.1 Transportation: The team objects to the quantum and quality of the proposed cycle parking. Further work is required on the location of blue badge spaces. The Transport Assessment and Delivery and Servicing strategy are complex and are inadequately described by the submitted documents, which would need to be substantially bolstered in post-planning work. In other respects, the scheme can be considered acceptable, subject to a number of proposed conditions and clauses within the legal agreement.

4.7.2 Streetscene: We are broadly supportive of the direction, particularly the inclusion of more trees and SuDS. Any opportunities for depaving and incorporating soft landscaping are welcomed and encouraged, subject to underground utility surveys that should be carried out prior to determination.

Any permission should be subject to an agreement for Section 278 highway work with an estimated cost of the work of £1,520,000 and a payment towards improvements on the adjacent public realm of £1,300,000.

There is a triangular shaped space at the junction of Curtain Road and Scrutton Street where the underlying land is privately owned but overlain by Public Highway.

St James House is shown built over some of this land. Streetscene will agree to stop up the area of land, with the proviso that the surrounding Highway may first have to be altered to ensure that pedestrian capacity and safety, and footway accessibility are not impacted. Such alterations may include realignment of the kerbs or repositioning the telephone box. There will be fees payable for designing, consulting and implementing any alterations for the stopping up; plus the Council's legal fees; and the value of the stopped-up land.

Officer's Note: The applicants have not carried out work to ascertain the extent and constraints of subsurface infrastructure adjacent to the site. This aspect is considered in the Highways section, below. The potential for stopping up the relevant part of the public highway is discussed in the Transport section, below.

- 4.7.3 Waste: No objection. This has a waste strategy which appears well thought out and is largely in line with guidance (there are slightly longer journeys to the bin store for some residents than the 25m guidance, but as the strategy says this is offset by the bin store being on the journey to the exit, and assisted collections being provided if needed).
- 4.7.4 Environmental Protection: No objection, subject to conditions relating to a Section 61 agreement to be made with LBH, to include specific noise and vibration limits at neighbouring properties; Residential sound insulation with post-completion testing; Sound Insulation between Residential and Commercial Properties; Kitchen extract flue details prior to any A3 use (odour); All plant noise to be 10dB below background noise levels at all times.
- 4.7.5 Pollution Air: No objection, A revised Air Quality Positive statement was provided during the course of the application and is now to an acceptable level of detail. Air Pollution officers are broadly satisfied with the breadth of measures that are included and consider that, overall, the 'air quality positive' approach has been followed. Conditions would be necessary in this regard, to ensure that the approach is adhered to. A further condition would have been recommended to explore alternative, less polluting, alternatives to the proposed diesel generators at the post-planning stage.
- 4.7.6 Public Health: No objection, subject to agreement of the detailed submission by the Council's consultees, in respect of the matters raised in the HIA.
- 4.7.7 Pollution Land: No objection. Nevertheless, this site is classified as Sites of Potential Concern, so we recommend attaching three contaminated land conditions to the application, which will require a detailed phased contaminated land risk assessment to be undertaken, and investigations into the risks posed by Radon and Unexploded Ordnance.
- 4.7.8 Drainage: No objection. Following amendments to the submitted documentation during the application period, the submission now includes most of the information requested by the Drainage team and GLA officers. Conditions are recommended to secure the details that remain outstanding.
- 4.7.9 Building Control: Objection. There are 10 blocks on this development. It is our opinion that a fire statement should have been submitted for each block for a

scheme of this size. We would also expect a master plan clearly illustrating the fire brigade tender access route to each block and the turning circle within the site. It must be ensured that all proposed landscaping does not impede this access to and from the site.

- 4.7.10 Regeneration: The Regeneration and Economic Development (R&ED) service welcomes the opportunity investment in the site could bring to generate new employment floorspace for growing businesses and increased employment opportunities. The proposal seeks to make better use of land and deliver new workspace and homes, principles which are supported and align with Council's Regeneration and Inclusive Economy objectives. The proposal is also projected to deliver wider benefits, which are generally welcomed, these include job creation, new office space including affordable workspace, and enhanced public realm.

Our concerns relate to the amount of affordable workspace being provided, the level of discount being offered on the affordable workspace, how the Urban Room is considered alongside the amount of affordable workspace, and how management and monitoring of affordable workspace and other public benefits can be controlled to ensure their benefit to Shoreditch and Hackney in perpetuity.

Contribution to Affordable Workspace (AWS):

The site is located within the Central Activities Zone and one of Hackney's Priority Office Areas (POA). The Local Plan (policy LP29) requirement for developments in this context is to provide 10% of the new employment floorspace as dedicated Affordable Workspace in perpetuity. The Council's area calculations suggest that the proposed scheme does not meet the 10% AWS requirement. The rate of AWS discount for sites in this location set by the policy is 60% (the application refers to AWS offered at 60% of market rate, which is a misreading of the policy).

In order to facilitate the redevelopment of this site a significant amount of existing low-cost and affordable workspace will be lost, through demolition or redevelopment; this is a significant disbenefit of the proposed scheme. This impact will be felt in the loss of low-cost workspace in an area of the borough which already suffers from lack of access to low-cost and affordable workspaces for businesses, especially those in the creative and green sectors which the Council is looking to retain and support, and which this application suggests it is seeking to foster. This loss will be to the detriment of the business and employment ecosystem of Shoreditch. The loss of this space, and the provision of AWS to fall short of the policy requirement, would combine to harm the area and is considered a significant disbenefit of the proposed scheme.

The R&ED Service has not previously allowed an Affordable Workspace discount to be applied at the applicants' discretion across providers/spaces. The overall aggregated discount of 60% may result in some individual units having a lower discount (i.e. higher rent) to balance the portfolio. The R&ED service remains to be convinced that this approach reflects the specific needs of the users, or that it will deliver the best benefit for individual businesses and the wider business ecosystem of Shoreditch. Providing further detail on how this impacts on affordability is required, to be reflected in the Section 106 agreement.

Urban Room

The improvements to the surrounding public realm, the new Urban Room for community, cultural and enterprise events, alongside new publicly accessible space with landscaping will provide benefits to the local community. The R&ED service does not agree that the proposals for the Urban Room provided in this application can fully be considered as representing affordable workspace. The Urban Room should be labelled ‘community, co-working, business forum and event space’, and be considered sui generis in any decision, and further details and clarification related to the space is required. The space is described as having a myriad of functions some of which align with the purpose of the AWS, many of which do not. While this combination of uses and offers is not unwelcome in a development of this type, the space dedicated to these uses (and the Urban Room) should not be offered to the dis-benefit of the formal AWS provision, but in addition to it.

Management and monitoring

We understand that the site’s Affordable Workspace Strategy has been developed through engagement with numerous local partners to deliver a programme that can benefit the local community across different sectors to foster collaboration and provide opportunities for community and innovation. The Community Engagement Strategy and operational management details need to be further developed to ensure that the ambitions and success of the AWS, Urban Room and wider development are realised.

The R&ED Service welcomes the work that has gone into developing this approach, and the ambitions that it sets out. However, these ambitions and commitments also need to be relayed in a form and mechanism that the planning system can account for and control, so they are truly embedded in the proposals and can be considered as realisable benefits associated with the proposed scheme. Details of how the management of space is to be monitored, and targets and KPIs for the social and economic benefits can be accounted for, are required to ensure the proposed benefits are realised and maintained through the S106 agreement. Without a mechanism to formalise and embed the intentions in the planning process, these ambitions cannot be measured as benefits of the scheme.

- 4.7.11 Employment and Skills Team: Hackney Works would form one of the Heads of Terms of any planning approval, in the normal manner. While Good People could well provide some added value, given that they are likely to work positively with the Employment and Skills team, this would not be acceptable as a replacement for the usual process, only as an additional element. Planning Policy and the Local Plan require an Employment and Skills offer that is directed towards Hackney residents, in a manner that is readily monitorable.

5.0 POLICIES**5.1 Hackney Local Plan 2033 (2020)**

- PP1 Public Realm
- PP8 Shoreditch and Hoxton
- LP1 Design Quality and Local Character

- LP2 Development and Amenity
- LP3 Designated Heritage Assets
- LP4 Non Designated Heritage Assets
- LP5 Strategic and Local Views
- LP6 Archaeology
- LP7 Advertisements
- LP8 Social and Community Infrastructure
- LP9 Health and Wellbeing
- LP10 Arts, culture and Entertainment Facilities
- LP11 Utilities and Digital Connectivity Infrastructure
- LP12 Housing Supply
- LP13 Affordable Housing
- LP14 Dwelling Size Mix
- LP17 Housing Design
- LP26 New Employment Floorspace
- LP27 Protecting and Promoting Office Floorspace in the Borough
- LP29 Affordable Workspace and Low Cost Employment Floorspace
- LP31 Local Jobs, Skills and Training
- LP36 Shops Outside of Designated Centres
- LP37 Small and Independent Shops
- LP38 Evening and Night Time Economy
- LP39 Over-concentration of Uses
- LP41 Liveable Neighbourhoods
- LP42 Walking and Cycling
- LP43 Transport and Development
- LP44 Public Transport and Infrastructure
- LP45 Parking and Car Free Development
- LP46 Protection and Enhancement of Green Infrastructure
- LP47 Biodiversity and Sites of Importance of Nature Conservation
- LP48 New Open Space
- LP49 Green Chains and Green Corridors
- LP50 Play Space
- LP51 Tree Management and Landscaping
- LP53 Water and Flooding
- LP54 Overheating
- LP55 Mitigating Climate Change
- LP56 Decentralised Energy Networks (DEN)
- LP57 Waste
- LP58 Improving the Environment - Pollution

London Borough of Hackney Site Allocations Local Plan (2016)
Site Allocation 125

5.2 London Plan (2021)

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience

- SD4 The Central Activities Zone (CAZ)
- SD5 Offices, other strategic functions and residential development in the CAZ
- SD10 Strategic and local regeneration
 - D1 London's form, character and capacity for growth
 - D2 Infrastructure requirements for sustainable densities
 - D3 Optimising site capacity through the design-led approach
 - D4 Delivering good design
 - D5 Inclusive design
 - D6 Housing quality and standards
 - D7 Accessible housing
 - D8 Public realm
 - D9 Tall buildings
 - D10 Basement development
 - D11 Safety, security and resilience to emergency
 - D12 Fire safety
 - D13 Agent of Change
 - D14 Noise
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring of affordable housing
- H10 Housing size mix
- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- S3 Education and childcare facilities
- S4 Play and informal recreation
- S5 Sports and recreation facilities
- S6 Public toilets
- E1 Offices
- E2 Providing suitable business space
- E3 Affordable Workspace
- E8 Sector growth opportunities and clusters
- E9 Retail, markets and hot food takeaways
- E11 Skills and opportunities for all
- HC1 Heritage conservation and growth
- HC3 Strategic and Local Views
- HC4 London View Management Framework
- HC5 Supporting London's culture and creative industries
- HC6 Supporting the night-time economy
- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI 1 Improving air quality
- SI 2 Minimising greenhouse gas emissions
- SI 3 Energy infrastructure
- SI 4 Managing heat risk
- SI 5 Water infrastructure
- SI 6 Digital connectivity infrastructure

- SI 7 Reducing waste and supporting the circular economy
- SI 8 Waste capacity and net waste self-sufficiency
- SI 12 Flood risk management
- SI 13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T6.2 Office Parking
- T6.3 Retail parking
- T6.5 Non-residential disabled persons parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the Plan and Planning Obligations
- M1 Monitoring

Mayor of London Housing Design Standards LPG

Mayor of London Sustainable Design and Construction SPG

City Fringe Opportunity Area Planning Framework

London Borough of Hackney Planning Contributions SPD

London Borough of Hackney South Shoreditch Conservation Area Appraisal

Emerging Policy

London Borough of Hackney Draft Hackney Future Shoreditch AAP

Mayor of London Draft London Plan

5.3 National Planning Policies/Guidance

National Planning Policy Framework (NPPF)

Planning Practice Guidance

5.4 Legislation

Town and Country Planning Act 1990 (as amended)

Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990

5.5 Policy Weight

5.5.1 Hackney's Local Plan went through examination with the Inspector aware of the then emerging London Plan. The Local Plan and the London Plan are both given weight in the assessment of this scheme.

5.5.2 The City Fringe Opportunity Area Planning Framework (2015) has been largely superseded in policy terms by the more recent London Plan. However, it is a material consideration within our assessment and provides guidance to supplement

the relevant policies of the London Plan and Hackney's Local Plan 2033.

5.6 Emerging Policy

Draft Future Shoreditch AAP Site Allocation (2019)

- 5.6.1 The site is allocated in the draft Future Shoreditch Area Action Plan as site FSOS 05. The site is located within the Central Shoreditch Neighbourhood within the Future Shoreditch AAP because the character of the site is considered to be more in keeping with historic urban fabric of brick warehouses to the north than the city-scale modern buildings to the south and west. The draft AAP sets out guidance for development in the Central Shoreditch Neighbourhood area.

- 5.6.2 The policies of the draft Future Shoreditch AAP (2019), including the site allocation under FSOS 05 are given limited weight but the work done to inform the drafting for the next iteration of the AAP, including by the Borough's Conservation, Urban Design and Sustainability team, has deepened the understanding of the proposal site and helped enable the discussion in the report that follows.

Further Site work for the AAP (2020 - ongoing)

- 5.6.3 The draft Future Shoreditch Area Plan (2019) offered a design-led exploration of the site's capacity and land use. Feedback received on the draft, alongside updates to the South Shoreditch Conservation area in November 2021, has enabled new thinking around the design principles for the site. From 8 July to 23 September 2024, the LPA conducted a regulation 18 consultation on the draft Future Shoreditch Area Action Plan and the direction of travel. The final draft of the Future Shoreditch AAP (Regulation 19) was adopted by full Council on 26 November 2025. Consultation is expected to run from late January 2026 for six weeks, with adoption of the AAP expected in late 2026 or early 2027.

6.0 COMMENT

- 6.0.1 Planning permission is sought for all works associated with the redevelopment of the majority of an urban block by demolition and part demolition of existing buildings to facilitate an office-led, mixed use development by the erection of 6 buildings with maximum heights of between six and 18 storeys (plus two storeys of plant) plus basements, the erection of a terrace mews of 6 buildings of two storeys, and the refurbishment and/or extension of Nos.26-24 Holywell Row, Nos.42-46 Scrutton Street and Nos.87-105 Worship Street; in order to provide 65448sqm of office (Use Class E), 4075sqm of retail floorspace (Use Class E), 78 residential units (Use Class C3) uses), an 770sqm Urban Room (Sui Generis), together with creation of a new central courtyard and pedestrian routes through the site, hard and soft landscaping and other associated and ancillary works. The application is accompanied by an Environmental Impact Assessment.
- 6.0.2 A reconsultation took place on 28 November 2025 in relation to some changes to the massing of the Verso tower. This created an increased setback above Curtain Road, removing a cantilevered section above the existing buildings, the removal of one storey of mechanical plant, and some simplification of the building form. The Urban Room was also reduced in size and a greater amount of retail space proposed.

- 6.0.3 For comparison, the scheme as originally submitted proposed 67742sqm of office (Use Class E), 3848sqm of retail floorspace (Use Class E), 78 residential units (Use Class C3) uses), an 871sqm Urban Room (Sui Generis),
- 6.0.4 The Listed Building Consent (LBC) has much smaller red line boundary, representing the curtilage of the Grade II* listed buildings. It is for internal and external works, including the demolition of later rear additions at 91-101 Worship Street to facilitate use as dwelling houses; Internal and external works to 103-105 Worship Street including the demolition of later rear additions, to provide a residential unit at the upper floors of 103 Worship Street and a ground floor commercial unit, and to facilitate the continued commercial and residential use of 105 Worship Street; New hard and soft landscaping, and other associated and ancillary works.
- 6.0.5 Since the two applications have different red line boundaries, we note that works within the boundary of the LBC also require planning permission.
- 6.0.6 The planning statement for the full application sets out the proposed phasing for the scheme:
- **Phase 1** is the 19 storey tower, the routes into the site and central space, and those buildings next to these new routes. It includes the refurbishment of 'St James Place', an existing building that is to provide the majority of the Affordable Workspace
 - **Phase 2** is an 8 storey corner building at Curtain Road and Scrutton Street.
 - **Phase 3** contains the majority of the residential units.
 - **Phase 4** is for the refurbishment of the Grade II* listed Phillip Webb buildings and the rest of the residential units in an extended 24-26 Worship Street.



- 6.0.7 The site is to be laid out in the following manner, with the names of the proposed buildings labelled:



- 6.0.8 The scheme is commercial led, in floorspace as well as phasing. 90% of the proposed floorspace would be in a non-residential use. The following commercial spaces would be provided (GIA):
- 41,819m² in the 19 storey Verso tower;
 - 13,032m² in the 8 storey St James House;
 - 5,254m² in the 7 storey Carman House
 - 3,994m² in the 5 storey Mason building
 - 3,122m² in the 6 storey Holywell Court
 - 2,547m² in the refurbished 40-46 Scrutton Street, to be named 'St James Place'.
 - 123m² in the refurbished 87-89 Worship Street
- 6.0.9 These commercial buildings are characterised by Class E office space at first floor level and above, with flexible Class E uses with active frontages at ground floor level. A sui generis mixed use space with a retractable rear wall for meetings and events that the submission names an "Urban Room" is found at the ground floor of the Verso tower facing the central space St James Place is the exception, in that it has office floorspace at ground floor level.
- 6.0.10 In addition to the commercial floorspace, the submission responds to pre-application advice and provides some residential units.
- 6.0.11 The submission identifies 38 existing residential units across the site. The proposed tenure/unit mix of the new buildings would be as follows:

Proposed	No. of Bedrooms per Unit					Totals
Type	Studio	1	2	3	4+	
Private	5	22	18	1	5	51 (65.4%)
Social rent	5	4	6	1		16 (20.5%)
Intermediate		5	6	0		11 (14.1%)
Totals	10 (12.8%)	31 (39.7%)	30 (38.5%)	2 (2.6%)	5 (6.4%)	78

6.0.12 This represents 34.6% of the overall provision as affordable housing.

6.0.13 Also included within the proposals are new landscaping works. These would include the creation of new public open space in the centre of the site, with two routes into the site created underneath the Verso tower and an open route from the north of the site by the Mason Building.

6.0.14 The main considerations relevant to this application are:

- 6.1 Principle of the development of the site, land uses and amount of development
- 6.2 Housing and tenure mix of housing provision
- 6.3 Design of the proposed development
- 6.4 Quality of accommodation
- 6.5 Transport and Servicing
- 6.6 Impact on Nearby Residential Amenity
- 6.7 Energy and Sustainability
- 6.8 Trees and Biodiversity
- 6.9 Scheme Viability
- 6.10 Environmental Impact Assessment
- 6.11 Health and Wellbeing
- 6.12 Other planning matters
- 6.13 Consideration of Consultee Responses
- 6.14 Planning contributions and Community Infrastructure Levy (CIL)
- 6.15 Equalities Considerations

Each of these considerations is discussed in turn below.

6.1 Principle of the development of the site, land uses and amount of development

Policy Context

6.1.1 The place policy for Shoreditch and Hoxton in the Local Plan (PP8) states that

development should intensify the use of land to optimise the capacity of Shoreditch to accommodate homes, workplaces, cultural and creative uses without compromising its special character. Local plan policy LP12 (Meeting Housing Needs and Locations for New Homes) identifies a need for 7000 homes in Shoreditch during the plan period.

- 6.1.2 LP33 policy LP27 (Protecting and Promoting Office Floorspace in the Borough) states that new development within the Shoreditch Priority Office Area (POA) will be permitted where it is employment led, with Class E(g) as the primary use, so long as at least 60% of the floorspace across the area as a whole remains as Class E(g) employment floorspace.
- 6.1.3 Paragraph 8.8 of the LBH Local Plan also points applicants towards providing the maximum economically feasible amount of employment land and floorspace for the site, subject to viability.
- 6.1.4 These policies are in line with London Plan policies SD4 (the Central Activities Zone) and SD5 (Offices, other strategic functions and residential development in the CAZ), which support office development in the Central Activities Zone (CAZ) and require that the distinct environment and heritage of the CAZ be sustained and enhanced.
- 6.1.5 The City Fringe Opportunity Area Framework (2015) has been largely superseded in policy terms by the more recent London Plan. However, it provides support for optimising the potential of sites within the City Fringe.
- 6.1.6 There are existing and emerging site allocations on this site. The Site Allocation Local Plan (SALP, 2016) looks at the entire urban block and the proposal site (Site 125) is approximately 80% of that area. The SALP estimates:
- 12,329m² GEA additional commercial floorspace
 - 31,536m² GEA new residential floorspace (432 units at an average of 73m² [SALP p129])
 - This totals 43,865m² of new floorspace across the allocation site.
 - There is 38,239m² existing floorspace across the site allocation site.
 - The existing and estimated new GEA would therefore be 82,104m².
- 6.1.7 The SALP looks for an employment-led, mixed use development that is informed by the heritage context: *“All the listed buildings should be retained and any proposal must be of exemplar design and consider the impact the development would have on the character and setting of these buildings and on the conservation area.”* It refers to an existing site character of 4-6 storey building heights but states that *“Taller elements may be appropriate subject to the appropriate approach in relation to listed buildings and the conservation area.”*
- 6.1.8 The emerging Shoreditch Area Action Plan (Future Shoreditch AAP) is in line with London Plan policy SD4, which requires that Boroughs should develop locally sensitive policies in their development plans to meet the London Plan’s objectives for the CAZ. The following guidance is set out for development in the Central Shoreditch Neighbourhood area:
- At least 60% Office floorspace.
 - Residential uses should be provided alongside office floorspace on new

development sites that can physically and viably accommodate residential use.

- Other uses suitable for the area include arts, culture, small scale retail and community uses.
- Arts, culture, leisure and larger retail should be provided on the Curtain Road, Rivington Street, Charlotte Road, Great Eastern Street and the Old Street frontages.
- Evening and night time economy proposals that are inclusive and diverse will be supported.
- Tall buildings (defined as 50% taller than the prevailing height) may be appropriate within Zones 1 and 2.
- All development should preserve or enhance the character of the South Shoreditch Conservation Area and respect the area's fine urban grain.
- Development should respond positively to identified local views, which aid in legibility and contribute positively to local townscape.
- All development will need to demonstrate how it protects or enhances the character of the conservation area and in respect of the area's fine urban grain.
- New development should contribute towards public space improvements.

6.1.9 The draft site allocation sets out the redevelopment of the site as a mixed use, office-led development with a substantial provision of residential units alongside ground floor retail and leisure uses. The following indicative capacities are stated:

- 33,800 sqm GEA of office space
- 215 residential units
- 1,150 sqm of retail floorspace

6.1.10 The draft allocation is concerned with the setting of heritage buildings and the conservation area, it gives guidance as to the appropriate heights of building frontages and allows the possibility of a tall building (30m+) in the middle of the site.

6.1.11 As discussed in paragraph 5.6.2, above, the policies of the draft Future Shoreditch AAP (2019), including the site allocation under FSOS 05 are given limited weight but the work done to inform the drafting for the next iteration of the AAP, including by the Borough's Conservation, Urban Design and Sustainability team, has deepened the understanding of the proposal site and helped enable the discussion in the report that follows.

Proposed Land Uses

6.1.12 Adopted policy context is therefore supportive of an employment-led mixed use scheme in this location and the principle of the development is accepted.

6.1.13 Since the adoption of the SALP and LP33, a number of large office schemes have been approved in Shoreditch that would go a long way to meet the LP26 (New Employment Floorspace) policy target to "deliver a minimum of 118,000sqm of new office floorspace by 2033." The need for 7000 residential units in Shoreditch (as per LP12) is therefore the issue of most pressing need.

6.1.14 In this POA location with a tight urban grain, smaller sites are typically able to provide only one core and residential units are often not proposed. This site presents a

significant opportunity for positive redevelopment which would deliver an uplift in commercial floorspace alongside much needed residential floorspace and complementary retail and leisure space. As such, the site allocation and draft site allocation are clear that residential units must be provided in significant numbers, to reflect the scale of the site.

- 6.1.15 As noted above, the indicative capacities of the adopted and emerging site allocations are smaller than the 78,375m² GIA currently proposed, despite the fact that the red line boundary of the proposal site is approximately 80% of the area of the site allocations. The proposed proportion of commercial to residential is far greater than envisaged by the allocations and the number of additional residential units is only 40, to be delivered in the last phase.
- 6.1.16 Nevertheless, as above, it is considered that the above points do not amount to the mix of uses being unacceptable in principle. In this Priority Office Area location within the City Fringe Opportunity Area and the Central Activities Zone, there are clearly a number of potential ways to develop the site and a scheme dominated by commercial development is one of those. While this is not unacceptable in principle, the result of any scheme that is not optimised in terms of the proposed land uses, when considering the local need described by policies PP8, LP12 and LP26, is simply that there are significantly fewer public benefits to add to the planning balance and to be measured against any harm that is identified in the detailed considerations of the report that follows.

Affordable Workspace

- 6.1.17 Local Plan policy LP29 requires that at least 10% (offset by the amount of low cost employment floorspace provided) of the new employment floorspace (gross) should be affordable at no more than 40% of the locality's market rent in perpetuity, subject to viability.
- 6.1.18 An inconsistency in the submission documents is noted. The Affordable Workspace Strategy refers to "the policy threshold of 60% of comparable market rates in perpetuity", while the Affordable Workspace Strategy Addendum correctly notes that the requirement is "a 60% discounted rate of comparable market rents". The following assessment is predicated on an interpretation of the applicants' intentions being to provide a 60% *discount* on market rents and for Affordable Workspace being defined as no more than 40% of market rents. This seems a reasonable interpretation, given that the Addendum document is more recent.
- 6.1.19 In terms of low cost employment floorspace, the definition in the Hackney Local Plan is of "Existing employment floorspace which may be secondary or tertiary in nature, of a lower quality or specification, with cheaper rents or leases, often providing space for general and light industrial uses, and start-ups, creative occupiers such as artists or makers spaces."
- 6.1.20 The LPA commissioned the "Future of Office and Employment Space in Shoreditch (Sept 2025)" for Shoreditch as part of the evidence base for the emerging AAP. This found that "Shoreditch rents have been relatively flat since 2019, apart from a dip during the pandemic, with Prime Grade B rents (which will typically be more modern property let second hand) around £15 per sq ft below Prime Grade A. Prime Grade A

space has risen modestly since 2019, from £72.50 per sq ft to £75 per sq ft, while prime Grade B grew from £57.50 per sq ft to £60 per sq ft.”

- 6.1.21 On this point, the submitted viability report (Financial Viability Assessment 3 October 2024 by Montague Evans) provides details of all the achieved rental levels. It states that there is 23,849m² GIA of office floorspace and that there are no achieved rents above £60 per sq ft for the site’s existing office floorspace. In line with the findings of the Future of Office and Employment Space in Shoreditch, this suggests that all of the existing buildings provide secondary and tertiary office accommodation, in line with the definition of low cost workspace.
- 6.1.22 The submission proposes 2,869m² NIA of Affordable Workspace, with the Urban Room included as part of the offer. The proposal uses NIA rather than GIA, in order that the plant and communal areas that are shared between the different uses, need not be considered. The total office floorspace is 43,116m² NIA. As such, the proposed Affordable Workspace represents only 6.6% of the total.
- 6.1.23 The whole of 40-46 Scrutton Street is to be refurbished and this would provide 73% of the proposed Affordable Workspace (2085m² NIA of the proposed 2869m² NIA). At present, this building currently achieves rents between £37.32 and £50.02 per sq ft across its floors, which would meet the definition of low cost floorspace.
- 6.1.24 Of the 2869m² total, a further 621m² (22%) would be provided within the Urban Room. The Borough’s Regeneration team have not objected to the principle of designating the Urban Room as Affordable Workspace but have questioned whether the proposed programming within the submission documents could properly be considered to perform this function. As sui generis space, its use would need to be tightly defined within any planning permission. We note that, when LB.Islington approved a similar space nearby at 99 City Road (the old Immarsat building) called the ‘Great Room’, the legal agreement included clauses that required the space for community and Borough use at a minimum of 26 days a year. Had the recommendation in this application been for approval, it would have been necessary to agree with the applicants that appropriate legal agreement clauses be inserted, in respect of the use of the space by specific groups of users and in addition to a standard Affordable Workspace statement for the Class E spaces. If sufficiently tightly controlled, the designation of this space as Affordable Workspace would not be objected to.
- 6.1.25 In order to justify the proposed shortfall on the 10% policy target, the submission states that [Planning Statement p71]: *“the Applicant has interpreted ‘new’ in the ordinary sense of the word, i.e. applying the policy to floorspace which did not exist before. There is no wording in policy which indicates ‘new’ means ‘existing’. As such the 10% has been calculated on the uplift in office accommodation.”*
- 6.1.26 On this point, new floorspace is considered to be all the new and refurbished space within a development and the Borough’s decisions have reflected that.
- 6.1.27 The submitted documents suggest that 2385m² GIA of Affordable Workspace would be lost by taking the submission’s approach. The submitted Planning Statement outlines that *“The existing Class E office floorspace on site equates to 23,849m² GIA. The proposed development would provide 58,269m² (GIA) of Class E office floorspace, an uplift of 34,420m². 10% of which is 3,442m² GIA.”*

6.1.28 For clarity, the policy reads (LPA emphasis in bold):

LP29 Affordable Workspace and Low Cost Employment Floorspace

A. New major employment and mixed used development in the borough's designated employment areas, Central Activities Zone and town centres should provide affordable or low cost workspace, **equating to a minimum of 10% of gross new employment floorspace.**

Re-provision of Low Cost Employment Floorspace

B. Major employment and mixed use schemes involving the redevelopment of existing low cost employment floorspace must re-provide the maximum economically feasible amount of low cost employment floorspace in perpetuity (refer to Appendix 1), at equivalent rents and service charges, suitable for the existing or equivalent uses, subject to current lease arrangements and the desire of existing businesses to remain on-site.

Affordable Workspace

C. If the low cost employment floorspace equates to less than 10% of gross new employment floorspace or there is no low cost workspace to be re-provided as part of a major development scheme, new affordable workspace should be provided as follows:

- i. Development in the Shoreditch POA: at least 10% (offset by the amount of low cost employment floorspace provided) of the new employment floorspace (gross) should be affordable at no more than 40% of the locality's market rent in perpetuity, subject to viability.
- ii. In remaining POAs, CAZ and town centres: at least 10% (offset by the amount of low cost employment floorspace provided) of the new employment floorspace (gross) should be affordable at no more than 60% of the locality's market rent in perpetuity, subject to viability.

D. New affordable workspace should normally be provided on-site. Only in exceptional circumstances where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash-in-lieu contribution will only be accepted where this would have demonstrable benefits in furthering affordable workspace in the borough and other policies in this Plan.

E. In circumstances where it is viable, both low cost employment floorspace and new affordable workspace should be provided.

F. Where additional floorspace is proposed through amended planning applications (i.e. through re-submissions or variations of existing planning applications or submission of a new planning application for an extension resulting in an increase in existing employment floorspace) within four years of the commencement of the original planning permission and the total amount of new employment floorspace exceeds 1000 sqm, affordable or low cost workspace will be sought in line with A and B above.

6.1.29 In this development, there are some large floorslabs being retained in part (see below discussion in the Energy and Sustainability section), where internal and external walls are removed but the slabs are temporarily propped to allow them to remain in situ.

Two locally listed buildings are being entirely built around and subsumed into the floorplates of the Verso Tower and St James House respectively. The argument of the submission is that even elements of floorslab should be removed from the overall calculation of the 10% to be provided as Affordable Workspace. For the purposes of this section of the discussion, it is possible to ignore the question of whether it will be practicable in reality to retain the extent of existing slab that the submission documents identify.

- 6.1.30 It is worth considering the objective of the policy, which in this POA is, most pressingly, to counter the loss of low cost employment floorspace in Shoreditch, either by the reprovision of low cost space or the provision of affordable workspace. The unfortunate result of the proposal would be that the existing, lower grade, cheaper floorspace to be replaced on site would be used to actually reduce the level of Affordable Workspace that is to be provided. On this reading, the more low and lower cost floorspace that is lost from a site, the less that would be provided by a new development. This would be a strange logic for the policy to follow.
- 6.1.31 With regard to the policy's specific wording, which refers to "gross new employment floorspace", it is correct to state, as the applicants do, that 'new' is not defined within the Local Plan. However, all dictionaries contain a word for 'uplift' and that is the word itself. The absence of 'uplift' from the policy wording should be enough to clarify that this is not the intended meaning. Moreover, the policy wording does include the word 'gross' and it is difficult to know why that word would be within the definition if the intention was actually that the calculation should be made on the net difference between the existing and proposed.
- 6.1.32 There is no commercial floorspace within the red line of this development that is not new, even St James Place (the Affordable Workspace building) is to be heavily refurbished.
- 6.1.33 The LPA considers that the submission's insistence on this point, in the face of the LPA's consistent approach across the Borough, and the acceptance of other developers of that approach, has created additional problems for the application. The scale of the proposed development in this conservation area location means that it relies on public benefits to overcome the harm identified in this report. The LPA agrees that there is some public benefit in the provision of any Affordable Workspace at all, so long as it is rentable space. However there is also an opportunity cost where an application does not achieve policy targets because, should such a development be built, the land cannot provide a better scheme. In this instance, where a large development is proposed within a Priority Office Area and where the proposed massing is larger than might be expected of this Conservation Area, the approach of this submission is considered unacceptable.

Affordable Workspace Viability

- 6.1.34 The submission provides two Financial Viability Assessments (FVA) in support of their application, one at the point of submission and one with the amended scheme. Consultants employed by the Council to review these submissions conclude that the amended scheme shows that a small surplus is achieved above the allowed profit margin when modelling the Applicant's Offer.

6.1.35 In addition, in this POA location the Planning Authority would first seek a policy compliant level of Affordable Workspace, with Affordable Housing a subsequent priority. Again, this is the consistent approach taken across Council schemes within its POAs.

6.1.36 For these reasons, the viability of the scheme is not considered to justify the level of Affordable Workspace provision.

Affordable Workspace Partnership Approach

6.1.37 The submission emphasises the benefits of their specific choice of affordable workspace provider and proposed tenants. The Planning Statement echoes many of the letters received in support of this application, which have drawn attention to the intention to provide:

“...a mix of affordable uses including co-working office space, a sustainability focused R&D laboratory and prototyping space, maker/ artist studios and exhibition spaces and the community focused urban room. Specialist providers and delivery partners have been identified to work alongside the Applicant here, such as Green Lab, the Crafts Council and the Association for Cultural Advancement through Visual Art (‘ACAVA’).”

The submission calls this aspect of the scheme a ‘Regenerative Business Hub’.

6.1.38 In general planning permission runs with land and it is not considered reasonable in planning terms to restrict the use of the affordable workspace to a specific operator. Even if such a restriction were imposed, this is not considered to ensure ongoing benefits as there is no certainty that the users would continue to occupy the premises. On this basis, whilst the merits of the proposed partners are noted limited weight is given to this as a public benefit.

6.1.39 A final issue with this aspect of the proposal is that the submission further reduces the quantum of Affordable Workspace, in line with their intention that: (*Affordable Workspace Addendum*) *“Given the plurality of affordable uses, it is proposed that these discounts be applied across providers/spaces to reflect [sic] the specific needs of the users, with the 60% discount being aggregated across the quantum.”* Clearly, floorspace that does not meet the discount criteria of the condition, is not Affordable Workspace. Had this recommendation been for approval, it would have been necessary for the submission documents to either:

- Commit to a deeper discount for some floorspace (without ‘aggregating’ upwards other floorspace), or
- To state how much of the proposed floorspace would not meet the definition of Affordable Workspace, so that this could have been discounted from the overall quantum to be considered.

Affordable Workspace Conclusions

6.1.40 The conclusion of this report is that the proposed quantum of Affordable Workspace does not meet the policy targets and that this is not justified by the submitted viability analysis. In this Priority Office Area, where there is a high level of existing low cost floorspace to be lost and a high quantum of proposed development, this is considered to be unacceptable. The prioritisation of low cost and Affordable workspace within POAs is a key policy objective and the following reason for refusal is recommended:

- The proposed development would neither reprovide the maximum economically feasible amount of low cost employment floorspace nor a minimum of 10% of the gross new employment floorspace as Affordable Workspace, in the Shoreditch Priority Office Area. The shortfall is not adequately justified by the submitted viability information. As such the proposed development is contrary to policy E3 (Affordable Workspace) of the London Plan (2021); and policy LP29 (Affordable Workspace and Low Cost Employment Floorspace) of the Hackney Local Plan 2033 (2020).

Employment and Skills Training

- 6.1.41 Planning Policy and the Local Plan require an Employment and Skills offer that is directed towards Hackney residents. The process must also be transparent, delivered in a manner that is easily monitorable.
- 6.1.42 As with the Affordable Workspace, the submission states that the choice of particular delivery partners is a public benefit of the scheme by (Planning Statement p116):
“Implementing a dedicated employment and skills programme in collaboration with GoodPeople, including an ‘on-site recruitment service’ during and after the construction phase, exceeding LBH’s standard s106 obligations by addressing labour market disadvantages and increasing vocational network access”
- 6.1.43 While the submission documents suggest that the applicant and their delivery partners would run the Employment and Skills aspect of the scheme, from discussions with the Borough’s Employment and Skills team this approach is considered unacceptable.
- 6.1.44 As such, had this recommendation been for approval, the use of GoodPeople, who the submission names as the chosen partner, would have been an additional and optional element, outside of any requirements of the planning process. It would not be appropriate for the LPA to require the applicant to choose GoodPeople in the legal agreement but nor would officers object to their involvement if the applicant chose to work with them as well as the Borough’s Employment and Skills team. Since this would not have been as a replacement for the use of the Borough’s in house service, Employment and Training s106 contributions of £352,687.50 towards Construction and Demolition and £1,320,451.20 towards End Use would have been sought. This would provide employment support to local residents, through job brokerage, work placements, local labour programmes, supply chain management and programmes aimed at assisting SMEs.
- 6.1.45 With clauses in the legal agreement to secure Hackney based and monitorable Employment and Skills provision, in line with the existing procurement contract, policy and the Hackney Planning Contributions SPD, the proposed development would be considered acceptable in this regard.

Principle of the development of the site, land uses and amount of development *Conclusions*

- 6.1.46 The principle of the development is accepted. The quantum of development is higher than envisaged within the site allocations for the Local Plan or emerging AAP. The

proportion of residential development is lower than expected by either of those allocations. The assessed need for new office space in Hackney (LP26- 118,000sqm of new office floorspace by 2033) has already been met by consented applications in Shoreditch but the need for new residential units (LP12- 7,000 homes in Shoreditch) has not been met. However, these are issues that can be considered within the planning balance, on the basis of the assessment that follows, rather than necessitating an in principle objection to the scheme.

- 6.1.47 The amount of Affordable Workspace is significantly under policy targets and is not explained by the submitted viability statement. In this Priority Office Area, on a site that currently provides all of its office floorspace as secondary or tertiary accommodation, this is considered to be unacceptable and a reason for refusal is recommended in this respect.

6.2 Unit and tenure mix of housing provision

Unit Mix

- 6.2.1 The site would provide 40 additional units compared to the 38 currently on site. The site is located in a POA, so an employment led development is not unacceptable in principle. Nevertheless, housing delivery is a pressing issue for the LPA and the site allocations envisage a more significant delivery of housing than is proposed, since the scale of the site provides a rare opportunity within Shoreditch to provide a more balanced mix of uses.
- 6.2.2 With regard to the unit size mix, Local Plan 2033 policy LP14 (Dwelling Size Mix) requires 33% of the available market units to be family sized (3 bedrooms or more), with a higher proportion of 2 bedroom than one bedroom units. Social rented units are expected to show an even split across 1bed, 2bed and family sized units. In intermediate units, cost implications mean that family sized intermediate units are only expected at a rate of 15-25% of the available units, with a higher proportion of two bedroom than one bedroom units.
- 6.2.3 The proposed housing mix is skewed towards smaller units:

Studio	1	2	3	4+	Total
10 (12.8%)	31 (39.7%)	30 (38.5%)	2 (2.6%)	5 (6.4%)	78

- 6.2.4 The four bedroom units are in the existing Phillip Webb buildings. The three bedroom units are also in existing buildings. The new Holywell Mansions building, which contains most of the proposed units, is made up entirely of studio, one and two bedroom units.
- 6.2.5 As such, the proposed dwelling mix does not resemble the preferred mix of policy. Nevertheless, LP14 is also clear that *“The Council will consider variations to the dwelling size mix sought if this can be justified based on the tenures and type of housing proposed, site location, area’s characteristics, design constraints, scheme viability; and where shared ownership is proposed, the ability of potential occupiers to*

afford the homes proposed.”

- 6.2.6 In this central location, where the policy target of 50% Affordable Housing is not being met and where the Holywell Mansions building, containing the majority of the proposed residential units, is surrounded by constraints, a variation to the preferred mix can be considered in the round. Many of the constraints of the site are related to the size of the Verso tower, which dominates the area within the red line and reduces the area available for open space and other buildings. It is considered that, had the development as a whole been considered acceptable in planning terms, the housing mix could also have been considered acceptable as being resultant of the design of the rest of the development.
- 6.2.7 Nevertheless, the low quantum of units, alongside the unit mix not meeting Hackney's most pressing needs, reduces the public benefit of the delivery of housing. It is unclear from the information provided whether an improved unit mix could be provided and therefore it has not been demonstrated that no greater public benefit could be offered via delivery of housing.

Tenure Mix and Affordable Housing

- 6.2.8 London Plan policy H5 (Threshold approach to applications) suggests a fast tracked approach for private developments that provide 35% of housing as affordable, where this (part c.3) meets the Borough policy targets. Local Policy LP13 requires 50% of housing as affordable, of which 60% is social rented and 40% intermediate, to promote mixed and balanced communities. As such, this application (which provides 28 Affordable units (36%) with a 57% social rent and 43% intermediate ratio, has been viability tested.
- 6.2.9 The following table shows the proposal is for 78 units to replace the existing 38 on the site:

	No. of Bedrooms per Unit					Totals
Type	Studio	1	2	3	4+	
Proposed						
Private	5	22	18	1	5	51 (65.4%)
Social rent	5	4	6	1		16 (20.5%)
Intermediate		5	6	0		11 (14.1%)
Totals	10 (12.8%)	31 (39.7%)	30 (38.5%)	2 (2.6%)	5 (6.4%)	78

- 6.2.10 This represents 34.6% of the overall provision as Affordable Housing, with 40.7% of

that provided as intermediate housing and 59.3% provided as social rented units.

- 6.2.11 Of the social rent units, 31% would be provided as studio units and 25% would be 1 bed dwellings. The sole family unit proposed as social rent is a 3 bedroom property, representing 6% of the social rent mix. As such, the social rent units would be heavily weighted towards smaller dwellings.
- 6.2.12 This impacts on the level of public benefit achieved by the Affordable Housing, since it does not respond to the established need for family sized units in affordable tenures. However it is not unacceptable in principle, since the ability of the scheme to provide an acceptable tenure mix is subject to review of the viability of the development.
- 6.2.13 The submitted Financial Viability Assessments for the submission scheme and the amended scheme have been reviewed by independent consultants at JLL and the Council's own officers.
- 6.2.14 The narrow scope and high level assumptions in the submitted FVAs are unusual for an application stage scheme of this size. It is considered that the submission is deficient in not providing a cost plan prepared by a QS. In addition, given that the allocations for the site are for a greater number of residential units, it was an expectation of officers in advance of submission that the application documents would want to demonstrate why this might not be viable. While a scheme of this size could be designed in a multitude of ways, Hackney officers' expectation was that the submission would aim to provide an option considering a revised scheme with more residential, at least to demonstrate that the proposed (assessed as unviable) scheme was the more viable.
- 6.2.15 This issue was raised at the start of the application process, and it was made clear that no more detail would be provided in these respects. Such an approach can be considered acceptable, depending on the purpose that the FVA is intended to achieve. If the submission relied on it for any reason, including a defence of why local policy targets in relation to Affordable Housing or Affordable Workspace could not be met, the lack of detail would have prevented it.
- 6.2.16 As such, the findings of the viability process are considered inconclusive. The JLL review of the amended FVA has found a small surplus of £348,945, on a profit margin of 15% of the Gross Development Value (GDV), when using the Applicants' Offer of Affordable Housing and Affordable Workspace.
- 6.2.17 In this POA location, policy LP29 requires 10% Affordable Workspace and, given that this has not been achieved, the first purpose of further viability reviews would have been to provide this. Additional Affordable Housing would only have been sought if there was further surplus sought once the issue around workspace was resolved. As such, the inconclusiveness of the viability assessment in the available time prior to the committee date is considered not to prevent assessment of the proposed levels of Affordable Housing. This is because the public benefits of the units that are to be provided can still be properly considered.
- 6.2.18 In this regard, the number of affordable units to be provided (27) is considered low for a site of this scale, lower than would have been predicted of a scheme that adhered more closely to the guidance of the site allocations. Of the 16 Social Rent units, only

one would be a family unit and 5 would be studio flats. As such, the chosen design has led to a scheme of low public benefit because of what it would deliver in terms of overall unit numbers, overall Affordable Housing numbers and the unit mix within the most affordable tenure.

Phasing of residential units.

- 6.2.19 In addition, the proposed phasing puts all the residential units within the penultimate phase of the development. This ensures that they would be very difficult to secure, further diluting the public benefit of their provision.
- 6.2.20 Since this is of significant weight within the planning balance, the applicant team has suggested clauses within a legal agreement that are intended to give surety of delivery. One is in relation to the residential units:
- That there would not be occupation of more than 85% of the permitted commercial floor area (Net Internal Area) until all residential homes are completed (including those in the listed buildings).
- 6.2.21 At 85% of the commercial floorspace, it is considered that the commercial area to be left vacant would not be sufficiently greater than local vacancy rates to provide surety that the residential development would be completed. We note that the submission contests this point, suggesting that vacancy rates for Grade A office space in London are currently low, and it is other Grades that are seeing high vacancy rates. However the applicant team has also pushed back on using the Verso tower as the building to be held unoccupied, stating that the 15% vacancy should be taken across the whole 'commercial' portfolio of buildings, which would include the Affordable Workspace, Urban Room and retail spaces. At the masterplan level of detail provided within the submission, there has been presented little evidence to suggest that the majority of floorspace outside of the Verso building should be considered Grade A. On a matter of such importance to the application, officers remain unconvinced that the proposed percentage of commercial floorspace is sufficient to act as an adequate disincentive to abandoning later phases should they prove less profitable than an alternative scheme. The context is one in which the assessed need for new office space in Hackney (LP26- 118,000sqm of new office floorspace by 2033) has already been met by consented applications in Shoreditch.
- 6.1.22 For the above reasons, the level of public benefit to be ascribed to the provision of residential units is considered to be low.

6.3 Design of the proposed development

Urban Design

- 6.3.1 Policies D1-D4 of The London Plan 2021 require architecture to make a positive contribution to a coherent public realm, streetscape and wider cityscape, incorporating the highest quality materials and design appropriate to the surrounding context. LP33 Policy LP1 states that all new development must be of the highest architectural and urban design quality. Development must respond to local character and context having regard to the boroughwide Characterisation Study, and be compatible with the existing townscape and local views.

- 6.3.2 Policy HC1 of The London Plan 2021 requires development proposals affecting heritage assets, and their settings, to conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. LP33 Policies LP3 (Designated heritage assets) and LP4 (Non designated heritage assets) require the Council to conserve designated and non-designated heritage assets (including their settings).

Design Review Panel

- 6.3.3 The Hackney DRP has commented on the developing scheme twice, and most recently on 5th December 2024. Feedback included a mix of positive and critical comments. The conclusion of the panel's feedback stated "The Panel generally welcomes the evolution of the scheme but remains critical of the general architecture and massing of the Verso building, the scale and grain of St James's House, the quality of the public realm and overall the public benefits delivered by the scheme".
- 6.3.4 Some specific criticisms of the December 2024 design have been addressed since. These include: removal of a proposed oversailing massing above 13-19 Curtain Road, and staggering of the setback massing above retained frontages on Scrutton Street, and changed materiality of the ground floor of the St James's building. Some areas of criticism have been partially addressed. These include some simplification of the massing and form of the Verso building which was seen as overly complex, and improvements to the architectural character of the Verso building. Other aspects of the scheme which received criticism and which have not been significantly changed include oversailing of the Urban Room, undercroft routes, the prominence of the setback upper floors of the St James's Building which the panel suggested appeared top heavy, and the length of the St James's Building on Curtain Road which the panel suggested should be broken down to reflect historic grain.

Significance of Area and Buildings

- 6.3.5 The site contains a group of Grade II* listed buildings and is in the South Shoreditch Conservation Area. It also contains several locally listed buildings. There are a large number of heritage assets in the vicinity of the site and the scale of the proposed development is such that it will be widely visible and has the potential to affect the setting of heritage assets in a wider area. A HTVIA has been submitted with the application which identifies heritage assets in the area with the potential to be affected and there is sufficient information to assess the likely heritage impacts of the proposal.
- 6.3.6 The heritage assets likely to be most affected by the proposal are as follows:

South Shoreditch Conservation Area

- 6.3.7 The South Shoreditch Conservation Area developed as an industrial suburb in the 19th century and has a long association with furniture and printing industries which reached their heights in the mid-late 19th century. It is one of the best-preserved Victorian manufacturing districts in London. The mix of commercial uses in the area remains important to its special character. Many of the buildings which survive today either originated from these trades or were used in some ways to accommodate

them, and those buildings provide a connection to the history and development of the area. It is notable for the industrial character of the architecture and the generally consistent scale, grain, and street pattern.

- 6.3.8 Parts of the street layout date back to late medieval and Tudor times and the earliest roads such as Shoreditch High Street originated in Roman times. Many of the earlier, narrower lanes were altered in the Victorian period, for example the creation of the railway viaduct and Great Eastern Street, which cuts across the older streets.
- 6.3.9 Most of the historic buildings in the area date from the nineteenth and twentieth centuries, but there are some earlier buildings surviving. Much of the area is characterised by grand, four and five storey former retail and warehouse buildings lining the main thoroughfares in combination with lower, smaller-scale buildings set behind the main frontages. These are divided by an irregular grid of smaller streets and lanes, the overall result of which is to produce a dense and intimate streetscape behind the wider, open thoroughfares.
- 6.3.10 The conservation area is large and several sub-areas are identified in the South Shoreditch Conservation Area Appraisal and Management Plan 2021. The development site encompasses the majority of an urban block. It forms a large part of the Holywell Row character area at the southern and eastern edges of the conservation area, which has a mixed character including some earlier buildings of residential scale and layout and areas of bomb damage that were redeveloped in the 20th century alongside the 19th century industrial buildings. There is a notable increase in the height and scale of buildings immediately to the south of the conservation area boundary, but within the conservation area, scale remains generally consistent with the historic pattern and heights are between 3 and 6 storeys.
- 6.3.11 The development site contains many historic buildings which make an important contribution to the special character of the area. The site also contains a number of mid-20th century industrial buildings and workshops that were built in bomb damaged areas. While these are generally of less architectural or historic interest in their own right, their scale, materiality, form and function are in keeping with established characteristics of the conservation area.

91-105 Worship Street

- 6.3.12 91-101 Worship Street is a historic row of shops with dwellings above and (originally) workshops behind, commissioned by the philanthropist Colonel Gillum and designed by the eminent Arts and Crafts architect Philip Webb. They are designed in the mould of earlier vernacular artisanal buildings as live/workspaces, presenting an unusual building typology, and incorporating active ground floor frontages that contribute to the character and vibrancy of the street. They are Grade II* listed for their high architectural quality and historic interest, and make an important contribution to the character and appearance of the conservation area. The interiors have been altered and subdivided over time, with original detailing lost. There is some evidence of condition issues and the group would benefit from sensitive renovation. They remain in use and a number of the units continue to be operating an active commercial use at ground floor level. The group includes a drinking fountain on the corner of No.101, which is poorly maintained and no longer in use.

- 6.3.13 103-105 Worship Street are a pair of houses adjacent to the Webb Terrace and also within the development site that are listed at grade II. They are thought to date from the 18th century making them one of the earlier surviving buildings in the area, but the fronts are 19th century.

Other listed and locally listed buildings within the South Shoreditch Conservation Area

- 6.3.14 13-21 Curtain Road, which is within the development site, is locally listed. It was built in 1871 and is one of the earliest surviving examples of a showroom-warehouse in Shoreditch and the former premises of one of the largest manufacturers and wholesalers in the furniture trade at that time.
- 6.3.15 24 and 26 Curtain Road are two early 18th century buildings with later shop fronts that are immediately opposite the development site on Curtain Road.
- 6.3.16 10, 14-21 (consecutive) and 24-27 (consecutive) Holywell Row and Clifton House (on the corner of Holywell Row and Worship Street) are locally listed. 24-27 are within the development site. The others are outside of the development site boundary but form part of the same urban block. Their setting would be considerably impacted by the development.
- 6.3.17 The Grade I listed Church of St Michael dating from 1865 by notable gothic revivalist architect James Brooks, and grade II* listed St Michael's Church School (1870) also designed by James Brooks and part of the same complex. This group is located towards the east side of the conservation area and further away from the application site, but the HTVIA suggests the development will be visible from within the church grouping. This complex is set within Mark Square and the setting is quite enclosed, largely now surrounded with larger buildings that obscure any opportunities for longer views of the church. The buildings are therefore experienced mostly at close range from within the square or from the immediately adjacent streets Mark Street and Luke Street.
- 6.3.18 There are various other listed and locally listed buildings in the wider conservation area. The height of the proposed building is such that it will be widely visible with potential to affect the setting of these buildings through impacts on views and townscape.

The Bunhill Fields/Finsbury Square Conservation Area (Islington)

- 6.3.19 This is an area just to the north of the boundary of the City of London, characterised by historically significant open spaces and surviving commercial and institutional development. The area largely developed in the 17th 18th and 19th centuries. At the time this location was on the fringe of the growing city and this influenced how the area developed and the historical uses.
- 6.3.20 The area is of considerable architectural and historic interest. It is notable for the quality and variety of historic buildings and structures and the varied townscape, and it contains several very significant historic spaces and sites: the grounds of the Honourable Artillery Company; Finsbury Square; Bunhill Fields Burial Ground and Wesley's Chapel, all of which make an important contribution to significance.

- 6.3.21 There is a large number of listed and locally listed buildings, monuments and significant spaces within the conservation area. The HTVIA reveals that the development would be visible from some views within the area, although the degree of visibility varies. The main assets that could be affected are:
- 6.3.22 Bunhill Fields: Bunhill Fields is a non-conformist burial ground dating from the 1660s. The plan form and boundaries are 18th century. It is a Grade 1 registered historic park and garden containing numerous listed structures and monuments. It is of considerable architectural and historic interest, including associations with significant people who are buried there. The green, open and tranquil character of the space itself makes an important contribution to character and significance, providing a connection to the past when the area would have had a very different and less urban character. It is now surrounded by much denser later development contrasting with the open character of the space itself. This contrast is now part of the established pattern of development and helps to illustrate how the area has developed and changed over time. However, these larger buildings do cumulatively detract from the important characteristic of openness and there is the potential for new larger developments to erode this further if visible from within the space.
- 6.3.23 Wesley's Chapel Grouping: This is a group of buildings associated with the early Methodist movement and with 18th century theologian and Methodist leader John Wesley, laid out around a central forecourt/courtyard. The buildings are neoclassical in style and the group has a clear symmetry and hierarchy with the Grade I listed chapel dating from 1777-8 as the centrepiece – considered to be of exceptional architectural and historic interest. Other significant structures in the group include:
- John Wesley's House (Grade I)
 - Statue of John Wesley (Grade II)
 - Burial ground containing John Wesley's tomb (Grade II*)
 - Memorial to Susannah Wesley (Grade II)
 - Chapel Keeper's House (Grade II)
 - The Manse (Grade II)
 - Benson Building (Grade II)
- 6.3.24 Armoury House and the Grounds of the Honourable Artillery Company: The grounds of the HAC is a highly significant historic open space. Its use by the HAC dates back to 1658. Grade II* listed Armoury House is the headquarters of the company and dates from the early 18th century with 19th century additions. It is symmetrical in form and set in the middle of the north side of the grounds where it provides a focal point for the space. The functional and visual relationship between this building and the open space makes an important contribution to the significance of both. There is a considerable amount of large modern development visible from within the grounds which detracts from its open character and is incongruous and imposing viewed alongside the smaller scale of the historic buildings. This is more focussed around the southern side. The north side retains more of its openness. There are some existing large modern buildings visible immediately behind Armoury House in this important view and these detract from its setting, but they are not as big as the buildings to the south and it currently retains at least some of its prominence in this view. Grade II listed Finsbury Barracks at the north east corner of the HAC grounds also forms part of the group, but the principal elevation addresses City Road rather than the HAC

grounds. Because of this, views from the HAC grounds make less of a contribution to its setting and significance.

Masterplan layout

- 6.3.25 The proposal includes around 11 distinct new, refurbished and extended buildings. The buildings are mostly arranged around the periphery of the site, facing outwards onto surrounding streets and also with frontages or elevations facing inwards onto routes and a central open space. Existing buildings that are identified as 'neutral' in the South Shoreditch Conservation Area Management Plan, but which are generally good quality buildings of their eras, are either demolished to make way for new routes and open spaces or structurally retained and extended. Statutorily listed buildings, locally listed buildings and buildings identified as making a positive contribution to character and appearance in the South Shoreditch Conservation Area Management Plan are retained in place.
- 6.3.26 The scheme reinforces street frontages and building lines on all surrounding streets while also defining new routes and spaces inside the site.

Plot amalgamation and grain

- 6.3.27 Smaller existing buildings on site retain evidence of historic plot division and grain, which in some areas is all that's left of the historic development pattern. New buildings amalgamate a number of these smaller plots into much larger plots. The St James's Building amalgamates 3 building plots on Curtain Road and wraps around a short terrace on Scrutton Street effectively merging 5 buildings into one. Visually this amalgamation is less apparent on Scrutton Street where the building has frontages which preserve the memory of the historic grain. The Verso Building amalgamates 5 plots into one. However the frontage is divided into elements which attempt to preserve the memory of a finer grained layout, although it is not clear these frontages do align with historic plots. Visual grain is better maintained on Holywell Row and Worship Street.

Demolition

- 6.3.28 Positive contributors and designated heritage assets are retained. A number of 20th Century buildings are having structures retained with one small area of post-war 20th century external facade retained on the Holywell Row entrance. While it is acknowledged that there are weak conservation arguments for retention of any one individual post-war 20th century building, the almost complete visual erasure of an interesting layer of industrial history, as well as loss of many historic plots held in place by those 20th century buildings, is considered to be unfortunate.
- 6.3.29 Likewise the replacement with a single era of 21st Century design, by one Architecture practice, using a limited range of contemporary architectural styles, overwhelming and sometimes subsuming the retained fragments of 19th Century development, will reduce the historic interest and value of this conservation area site. Shoreditch is notably layered and has been incrementally developed, with wholesale development of large areas usually the result of unplanned devastation. In terms of character and heritage, the visible loss of almost all Post-War 20th century industrial buildings is unfortunate. It could be argued that over such a large scale this approach

adds up to a failure to meet the requirements of LP1 - being compatible with the existing townscape, urban grain and plot division, and, preserving or enhancing the significance of the historic environment.

- 6.3.30 As such, the following assessment considers whether, if the perimeter buildings are to be demolished, the proposed development would provide an acceptable set of replacements, alongside the other new buildings and plot amalgamations proposed. In this case, on a recognised opportunity site, the question is of whether the townscape and heritage benefits of development would outweigh the disbenefits.

Masterplan movement and connectivity

- 6.3.31 At present, the site and the urban block it is part of, has no public through-routes or public open spaces. The proposal would create a sizable area of new pedestrian-focused, landscaped public realm including open spaces and lanes. Proposed routes connect legibly with streets around the site which would encourage movement across the site. From the east, Hearn Street and Plough Yard would connect to new undercroft passageways into the site. From the north, Scrutton Street, New North Place and Phipp Street would converge a new, open-air street (Mason's Walk) leading into the site. Undercroft routes are introduced from Worship Street through existing historic arches. Undercroft routes tend to appear less public and welcoming than open streets, however proposed undercroft routes (such as Rose Walk and St James's Passage) have high ceilings/soffits, indicative artwork, active frontages and routes are relatively short. Additional shelter is also positive in an area with few sheltered public spaces.
- 6.3.32 The DRP considered that there are weaknesses to the routes. It identified that only one access point into the site is not within an undercroft, and has recommended that a primary route is open at both ends. This represents a conflict with policy LP1 which requires all new development to "facilitate movement through areas with direct, safe, accessible, and easily recognisable routes (legibility)".

Masterplan landscape, public realm, open space

- 6.3.33 The character of Shoreditch has informed the concept for the public realm and includes colourful murals, food and bars. Integration with the context appears intentionally maximised with direct routes aligned with natural desire lines, inviting architecture designed to create welcoming entrances and views through and into the spaces, and plenty of high quality landscape and seating to give people a reason to stay. Public, and consultee comments and suggestions have been incorporated.
- 6.3.34 The central open space (Rose Yard) itself is slightly smaller than the open space at the centre of the Stage Development. The smaller size is not necessarily negative as good Shoreditch and nearby spaces are usually intimate and busy rather than large. The space is augmented by smaller spaces and routes. The space would have a very different character to the Stage space - materially it would be surrounded by richer and more saturated colours more related to Shoreditch, warmer coloured paving, more planting and more active frontages. As it lies on major natural desire lines it should be livelier. However, the scale of surrounding buildings would overshadow the space and the proposed tall buildings would generate increased wind.

Urban Room

- 6.3.35 Provided on the western ground floor of the Verso Building, the Urban Room is part of the scheme's affordable workspace offer and a key part of the public realm offer. Had this recommendation been for approval, a programme of social, cultural and business uses would have formed part of the legal agreement, to ensure that this did function in the manner of Affordable Workspace. Open, retractable frontages and an extension of the materiality of the outdoor spaces aim to make the space feel like part of the public realm during the warmer months of the year. 7.5m high ceiling with a mezzanine set in would create an area with a reasonably high floor to ceiling height, although it would still feel like a ground floor interior space rather than an outdoor space extension.
- 6.3.36 The positives of the Urban Room could be significant. Despite the approval of similar space in Islington by the Old Street Roundabout (Immarsat building), Hackney has no similar space, and provided that the programming is successful and the routes and spaces are as well used as intended, it could become an all-weather attraction within Shoreditch. Nevertheless, caution has been raised by officers, the GLA and DRP that the space may read as a private ground floor of the office tower that sits above it. Given that the space can be closed to the public at any time it is considered to be an interesting and positive offer but not clearly a part of the public realm.

Public Realm Materials

- 6.3.37 The public streets of Shoreditch are defined by a limited palette of historic hard surface materials which contribute to the cohesive character of the area while plans show highly contrasting materials and paving patterns. While feature areas of special paving would be appropriate within the site, a stark change at the site boundary to a very different character paving is considered to undermine the sense of this being a welcoming and public space.
- 6.3.38 While this design detail in isolation could be conditioned, it contributes to a list of minor and more significant design choices that set the scheme apart from its conservation area context and add up to a failure to successfully complement local character.

Masterplan form, height and massing

- 6.3.39 The overall scheme aims to increase density on the site and presents a case for new large and tall buildings relating to the greater scale context towards the City of London, with massing stepping down in scale towards the core of the conservation area to the north and west. The blurring of the abrupt transition that is currently seen at the Conservation Area boundary is key to the submission's argument for extra height. However, the Borough's Urban Design officers consider that there is a valuable contrast between the scale of the conservation area and the taller buildings outside it that policy and guidance aims to maintain. Also, it is the Council's case that buildings surrounding the site step down towards it (and the conservation area), meaning that very tall buildings are not actually a feature of the setting or surroundings of the conservation area, and that the proposed tower is not responding

to an adjacent context of similar height. The proposed tower would therefore introduce an inappropriately large and tall building where justification for it is weak.

Conservation Area context

- 6.3.40 The site is within the South Shoreditch Conservation Area which is characterised by 4 and 5 storey historic warehouse frontages of around 14.5m to 19m. The area has many buildings below this characteristic range, but very few above it. A small number of buildings sit in the 20m to 40m range, which have carefully organised massing to minimise primary frontage heights and limit the visibility of the uppermost storeys. In addition, the conservation area has one landmark tower of 100m and two towers of similar height with planning permission, all on peripheral sites. These buildings are located at nodal points in the townscape, and have complex planning and heritage harm/benefit balances. (Heritage impacts are discussed in detail in a separate section below from 6.3.98 onwards.)
- 6.3.41 The council has carried out work as part of the work for the emerging Shoreditch Area Action Plan that suggests that a tall building (30m+) could be accommodated centrally within the site but identifies that above a certain height harmful impacts on heritage assets would likely become unacceptable. At c85m above street level at its tallest point, the scheme is considered to be inappropriately tall for the conservation area, creating various harmful visual impacts to the conservation area and historic assets.

Interior of the site

- 6.3.42 The application site suffered heavy wartime damage and now has a high number of post-war buildings which generally reinforce the character of the area. There is capacity for greater density and height at the interior of the site, in this highly accessible, central location. Most proposed buildings here (Mason building, Holywell Court, Holywell Mansions, Carman House) are of a comfortable or tolerable scale, but the Verso Building is likely to undermine the good qualities of the interior of the site.

Relationship with Curtain Road

- 6.3.43 Curtain Road has a strong continuous building frontage line on the site made up mostly of 20th Century buildings, as well as one historic warehouse and a historic ground floor frontage. 20th Century buildings here are 3 storeys/13.7m and 4 storeys/13.9m. This is lower than the prevailing conservation area heights and lower than the 5-storey/18m locally listed warehouse at 13-21 Curtain Road (the only significant historic building left on this street frontage). Officers consider that there is the potential for additional height here to bring the frontage up to around prevailing heights.
- 6.3.44 On the east side of Curtain Road, most existing frontages range from 20m to 38m, with massing of 50 to 60m setback by between 10 and 30m, reducing or eliminating the impact of the tallest elements from Curtain Road.
- 6.3.45 Further to the east, 3 very tall buildings of 100m+ are located around 75m and 135m away from Curtain Road but the distance reduces their visibility and impact on the character of Curtain Road. Buildings in-between these towers and Curtain Road

carefully step down towards the conservation area, meaning that the impact of very tall buildings on the character of the streets surrounding the site, is limited.

- 6.3.46 The proposed frontages to Curtain Road are considered to be broadly acceptable in terms of height - The range of frontage heights reflect the variety seen in historic commercial frontages nearby and the vertical emphasis of buildings reflects Shoreditch Character. The additional height of the street frontage buildings would add some positive gravitas and additional enclosure to Curtain Road. However the complete loss of post-war 20th century frontages would remove that layer of history and its associated scale.
- 6.3.47 From the eastern pavement the upper floors of the Verso Building would be visible, setback behind its finer-grained street-facing frontages. The staggered massing of the tower, with tallest elements setback c15m and 20m from the street frontage, would somewhat reduce its apparent breadth/width from the viewpoints north of the tower and directly to the east. From the south the bulk of the tower would be fully apparent.

Relationship with Worship Street

- 6.3.48 The Worship Street frontage of the site is defined by historic frontages which create a positive setting for the grade II* listed Philip Webb Terrace and a defined edge to the conservation area. At the junction of Worship Street and Curtain Road the abrupt change in character, from modern to historic, from coarse to fine grain, and from a tall to a human scale, marks the arrival into Shoreditch from the City. The Shoreditch Conservation Area Management Plan, recognises that this is valuable and also that it is being threatened by inappropriately scaled development.
- 6.3.49 While the proposed frontage to Worship Street is acceptable in its height and massing, with very little change to the historic frontage, the addition of a tall tower visible from Worship Street and above historic rooftops, would blur the characteristic separation of the City and Shoreditch. This is not compatible with the existing townscape, in conflict with policy LP1.

Relationship with Scrutton Street and Holywell Row

- 6.3.50 Scrutton Street is defined by warehouses and terraces between 4 and 5 storeys (14 to 18m). 20th Century buildings here, particularly on the site of the proposed Mason building, add some uncharacteristic horizontality, which is combined with low height on 32 Scrutton Street.
- 6.3.51 Holywell Row is defined by 3 to 4 domestic storey frontages ranging from 7m to 13m.
- 6.3.52 The Mason building is taller than the existing building but within the range of heights that characterise most of Shoreditch.
- 6.3.53 The frontages of the St James's Building are a comfortable height but the stepped massing above the retained Scrutton Street terrace is considered to be overbearing. It fails to be subordinate, creating the impression of a shallow facade retention. The full height of the corner element of the St James's Building and the form and prominence of its recessed upper two storeys, at 35m in height, do not preserve or enhance the character of the conservation area in the manner required by LP1 and LP1C.

Individual Buildings - Verso Building

- 6.3.54 The Verso Building is a 17 storey, c85m tall office building (100m tall AOD). It has a wide base defined by Curtain Road, the central space and the north (Rose Walk) and south access passages from Curtain Road. The massing recedes in staggered volumes as height increases. The form of the tower would appear as two large staggered vertical volumes rising from, and set back from, a volume of development below. The Curtain Road-street frontages of the tower are volumes and elevations related to the Shoreditch scale. One of the frontage elements is a retained warehouse which the base of the tower wraps around.
- 6.3.55 The tallest parts of the building are set back between c10m and c20m from Curtain Road. The tower has a stepped frontage towards the central open space and almost full height elevations land on the north and south access routes.
- 6.3.56 The form of the tower and building has been simplified over the pre-app process and in response to DRP comments which considered the form and massing to be overly complex. The tower includes stepped terraces which reduce the massing towards the top and which is positive in principle. However, the building is still bulky which creates an overbearing presence in views from the west and south-east, and an overbearing impact on surrounding routes and spaces.
- 6.3.57 The tower presents a 14 storey/ c58m tall frontage to the main open space, setback very slightly behind a c5 storey element. The height above 14 storeys is effectively set back to reduce visual impact. However, the 14 storey frontage is still very tall and is likely to have an overwhelming impact on the open space.
- 6.3.58 The full c85m height of the tower lands directly, without any softening of the massing, on the north access route from Curtain Road (Rose Walk) with a very close relationship to the historic St. James's Place. A 68m frontage lands on the southern route. At these points, the height of the tower would be overbearing on the public realm.
- 6.3.59 As discussed in the masterplan massing section above, the tower is setback from Curtain Road by c10 - 20m. This effectively hides the tower from the west side of Curtain Road along the site boundary. Half of the tower massing is set back by c20m which creates the sense of a slimmer building from some viewpoints to the north and east.
- 6.3.60 The tower is visible from the length of the east side of Curtain Road opposite the site, setback behind street frontages. The setback would help to reduce impact and widen the area of sky above the street.
- 6.3.61 The tower would have a significant impact on the public open space (home to a museum to a scheduled ancient monument below street level) at the Stage development, where it would fill open sky on the west side, further reducing light penetration to what is already an overshadowed space, and looming above listed buildings in the foreground.

- 6.3.62 Hackney's tall building policy requires "exceptional design quality in terms of... form' and "...must enhance the streetscape' and "make a positive contribution to the quality of public realm". The tower, in terms of its height, form and massing, is considered to have a number of urban design weaknesses which means it does not meet all the criteria of LP1 and LP1C. Particularly the scheme makes a negative contribution to the public realm in places due to the overbearing impact of height on narrow passages and open spaces, and in these locations the tower is not seen to enhance the streetscape.
- 6.3.63 The Verso tower draws on the mid to late 20th Century architectural character of the area, and proposes pale brick, blue ceramic, and glass block cladding. Windows and facades have a horizontal emphasis. There is some inconsistency across the design with some open glazed corners and some solid corners which creates a somewhat confusing appearance. The tower does reference the post-war era of architecture, which otherwise is to be removed from the site.
- 6.3.64 The lower levels of the Verso Building on Curtain Road are screened by a series of 19th Century-inspired facades which are unrelated in character to the tower above, which leads to an incongruous elevational composition. Bringing some of the tower design to street level would have created a legible entrance, broken up the traditional character with something more modern as is common in Shoreditch, and allowed passers-by to appreciate the materiality and bay design up close.
- 6.3.65 Overall, the good aspects of the external architecture of the tower and the massing it relates to, are let down by more significant weaknesses in massing, relationship of massing and architecture to the street, questions over material choices, notwithstanding issues around height and impact, and as such it is considered that the architectural design does not represent 'the highest architectural and urban design quality' required by LP1 and "of exceptional design quality both in materiality and form" as required by LP1C.

Individual Buildings - St. James's House

- 6.3.66 The building footprint is formed from the merging of a number of plots together. It would appear as a large primary building on the corner of Scrutton Street and Curtain Road while the rest of its massing will be disguised by retained frontages on Scrutton Street and a new 17.5m elevation next to it. Set back behind these street frontages are volumes rising to a maximum of 25m.
- 6.3.67 The frontage of the primary building is 6 storeys and c25m tall, with two storeys setback above taking the total height to c35m, making it a tall building in policy terms. The 25m frontage is tall for Shoreditch where characteristic heights are around 4 and 5 storeys / c14.5m to c19m.
- 6.3.68 There are a small number of local buildings that rise to within a 20m to 40m range. These have carefully organised massing to minimise primary frontage heights and limit the visibility of the uppermost storeys. The proposal could be compared to the Worship Square office building, which also sits at the periphery of the conservation area and has a primary frontage of 23m and two primary setback storeys of 30m. The Tea Building is very large for the area and occupies a landmark site on the edge of the conservation area, with a primary frontage of c25m.

- 6.3.69 The Design Review Panel indicated that, while the street corner may be a suitable location for a taller building (a building which is taller than the prevailing), the two setback storeys “*appear visually awkward and top-heavy*” and Urban Design officers concur with this assessment. The 25m primary frontage can be considered acceptable from an urban design viewpoint on this corner site in the context of buildings of a similar height to the east and along Curtain Road nearby. However, the two prominent storeys above bring the total height well above nearby buildings and give undue prominence to the corner. The total 35m height triggers Hackney’s tall building policy and the criteria that are used to ascertain the suitability of a site for a tall building and the suitability of a tall building proposal for a site.
- 6.3.70 With reference to LP1C, a tall building here would enhance the streetscape, and would not cause excessive overshadowing. It would somewhat enhance the public realm overall despite tightening the area of public realm on its corner. However it would not reflect the council’s place policy or vision for the area, it would not preserve or enhance heritage assets, and it would give undue prominence to the corner site which would not represent a legible and coherent role in the context.
- 6.3.71 In addition to the proposed height, the Curtain Road frontage is c53m in length making it broad for a conservation area building, although not completely without precedent. The Tea Building is 58m wide on Shoreditch High Street for comparison. However in this case, the merging of plots would mean a loss of the finer grain that would represent harm to the conservation area. The scale of the building would bring characteristics of the City and Broadgate into the finer grained and lower height context of Shoreditch, which represents a failure to respond to the local character and context as required in policy LP1 . Again the Hackney DRP “raises concerns regarding the amalgamation of the different plots to create a single large building which fails to pick up on the grain of the existing historic townscape.”
- 6.3.72 In conclusion, the bulk, height and massing of the St. James’s Building are considered to be excessive for the site.
- 6.3.73 With regard to the proposed architecture and materials, the primary corner building, which represents around $\frac{2}{3}$ of St. James’s House, is clad in expressively detailed light red brick, with arched window openings, crittal upper-floor windows, large ground floor ‘showroom’ windows and a richly detailed corner reflecting the curved corners seen along Great Eastern Street. The ground floor of the proposal is clad in dark brick, which is a welcome change that helps ground the building that was made in response to a DRP suggestion.
- 6.3.74 The external architectural concept is traditionally inspired, with an expressive and articulated masonry facade and generous brick detailing. Visuals suggest an attractive building with some elements taken from the Shoreditch context. However, concerns have been raised over the course of the pre-app that the character of the proposed building is not clearly ‘of’ Shoreditch, particularly as the design heavily references a number of international precedents. While officers and DRP have not requested a Shoreditch pastiche, they have asked for the building to be closer related to Shoreditch. The DRP are concerned with the height and scale, the subsuming and facade retention of the Scrutton Street terrace and the unbalancing of the street. In terms of character the DRP suggested that “While a warehouse style has been used

owing to the height of the building, it does not blend in with historic warehouses which are of a human scale. ”

- 6.3.75 Officers conclude that some intended references to the context suggest a poor understanding of defining characteristics of the area. For example, crital windows are proposed while sash windows are a defining feature of the large warehouses being referenced, and the rich brick detailing, while attractive, is not a feature of Shoreditch warehouses, where detailing is often simpler. Again, the preferred brick colour is not characteristic of Shoreditch when used as a primary or dominant material on a street. Architectural references from Broadgate, and mainland Europe seem to dominate the character of the proposal. As part of a wider development with similar weaknesses in many of the buildings, the St James's Building is considered to be compatible with the existing townscape as required by policy LP1, and not yet appropriate to this specific Shoreditch site.

Individual Buildings - Mason Building

- 6.3.76 This proposed building has a 4-storey frontage facing Scrutton Street and Rose Yard. The frontage is the same height as at St. James's Place, the retained historic warehouse to the east. Above the 4th floor parapet, a setback 5th floor brings the main visible height to around 18.75m. Setback above this is a plant enclosure which rises to 21m. While the 5th floor is a little tall for the location it appears broadly comfortable in street views and is within the range of heights which characterise Shoreditch. The plant enclosure is tall for the area but is only minimally visible in views from Holywell Row, Phipp Street and Scrutton Street.
- 6.3.76 The height form and massing of the building is considered acceptable. It would define the building line of Scrutton Street and the new entrance to the site. The south elevation would define a side of the main open space.
- 6.3.77 The architectural concept is described on page 241 of the D&A. The facades are flat surfaces referring to nearby historic buildings, with regular punched 'sash' style (2 panes over 2) bronze windows with vertical proportions and stone or GRC lintels. Corners are curved. The facade is clad in teal glazed brick with white introduced at the upper floor with blue tile density dissipating towards the top.
- 6.3.78 There are minor unconvincing aspects of this RIBA stage 2 design that could reasonably be dealt with at condition stage. For example the specific colour of the glazed bricks are challenging in the context, particularly near to another blue building on Worship Street, in an area otherwise defined by warm tones and colours. Other minor details could be detailed later, such as the glazed brick party wall in an area where side elevations are usually London stock with any more elaborate material being confined to the primary elevations.

Individual Buildings - Carman House

- 6.3.79 The proposed frontages of Carman House include a 3 and 4 storey frontage to Curtain Road and the access route, and a larger extended and retained volume to the interior of the site.

- 6.3.80 The design and massing of the Curtain Road frontage closely reflects the design and reinstates the massing that was located on this site historically. The rear massing of Carman House involves an upward and southern extension to an existing 19th century building, bringing it to 27m in height at its tallest point. The massing is slightly visible over rooftops from the junction of Appold Street and Worship Street although in the foreground of the much taller Verso Building. The main massing facing the central space is 19m tall. The massing facing towards the Webb Mews is 19m tall which is similar to the existing massing.
- 6.3.81 The height, form and massing of Carman House is successfully arranged to minimise visual impact and is considered acceptable in urban design terms. The retention of the building and reinstatement of its street frontage preserves one of the linked showroom and manufacturing buildings which historically occupied the site.
- 6.3.82 In respect of the proposed architecture and materials, the Curtain Road frontage is an extension to a retained ground floor frontage, using similar materials of light brick with red brick arched lintels, and a compatible architectural style. The approach to the extension very closely reflects the original frontage that once stood above the retained frontage. While more detail would have been needed by condition, the concept is considered acceptable from a design point of view.
- 6.3.83 The rear (north) elevation repeats the frontage approach used on Curtain Road which is acceptable.
- 6.3.84 The southern elevation is a modern glazed / metal screen with the solid to void ratio balanced to reduce solar gain. The elevation would be visible in views towards the rear of the listed terrace but is also setback with minimal impact and is otherwise a good quality design appropriate to its largely hidden location.

Individual Buildings - Holywell Mansions and Morris Mews

- 6.3.85 Holywell Mansions has a main frontage facing the central open space of 24m with a setback storey behind up to 27m and a plant enclosure above rising to 32m, making it a tall building by the policy definition.
- 6.3.86 Holywell Mansions is separated by 6m - 7m from buildings on Worship Street, creating a tight residential garden area and minimal separation. Flats on the lower 3 floors, on the SW corner of the block, would have very limited outlook. The building is mostly hidden from view from surrounding streets although is visible from Vandy's Street and looking south along New North Yard. Evidence has not been provided to show if there are other locations where it is visible, and nor have these views been assessed within the submission on why the visual impact should not be considered harmful.
- 6.3.87 There is no justification included within the submission for a tall building of 30m+ in this location or to examine how it would appear in conservation area views beyond the site. As such this aspect is not currently acceptable as its impacts are wider ranging than has been shown.

- 6.3.88 The proposed materiality is primarily brick, with precast concrete inset spandrels, bronzed metal balustrades and bronze metal doors and window frames. The upper level has a perforated brick plant screen.
- 6.3.89 It has a dual stair core which lacks natural light or ventilation. This contradicts London Housing LPG which asks for natural light and ventilation to cores. The layout otherwise includes dual aspect flats.

Individual Buildings - Holywell Court

- 6.3.90 Holywell Court steps up from 7m in the north to 12m, 16m and 21m with a plant enclosure above rising to 25m. Separation distances from existing Holywell Row buildings beyond the site boundary appear to be acceptable in urban design terms.
- 6.3.91 The building incorporates a retained ground floor and retained elevations from the existing characterful building of 25 Holywell Row which is considered positive.
- 6.3.92 The east-facing elevations are red brick, with recessed stone/ glass reinforced concrete lintels and window surrounds. Terraces would be surrounded by metal balustrades and the plant screen would be in hit-and-miss brick. The designs remain at quite a conceptual stage and would need to be controlled by condition. Facade mock-ups would be needed to test the design in context. Overall the design is considered attractive and compatible with the context.

Individual Buildings - St James Place

- 6.3.93 St James's place is a retained heritage building and its height and massing remains unchanged. The western elevation will be repaired and reinstated after the removal of a long brick wall. The building will make a positive contribution to Rose Yard.

Individual Buildings - Webb Mews, 24-26 Holywell Row, 87-89 Worship Street

- 6.3.94 In urban design terms, the proposal is considered acceptable in respect of these buildings, which are considered to be of an appropriate height, scale and massing and which includes renovations of existing character buildings.
- 6.3.95 The changes to the rear of 87-89 Worship Street, which protrudes beyond the common rear building line, allow for improved access and the creation of a linked open space.
- 6.3.96 The rear extension of 87-89 Worship Street to be removed appears more recent than the main building and its removal allows for reinstatement of the rear facade. The proposed rear facade is acceptable and appropriate.

Urban Design Conclusions

- 6.3.97 It is recognised that the scheme has positive attributes, which include the creation of a new, publicly accessible, urban realm with good quality landscaping, an increased volume of development and additional commercial activity in a highly accessible, central location. However, the scale, bulk and massing is considered to be excessive, resulting in harm to the conservation area, a reduction in the area's fine grain and

compromises to a public realm that could have been a greater strength. The external architectural character, while promising traditionally-inspired masonry frontages, does not successfully reflect the unique character of Shoreditch, its rich architectural variety or its defining materiality and colour. Overall, the scheme does not meet enough of the requirements of design policies LP1 and LP1C and the scheme is considered to be unacceptable in terms of design and townscape impacts.

Conservation and Heritage

- 6.3.98 The Council is under statutory duties contained within sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to grant permission only to applications which preserve or enhance listed buildings, their settings and conservation areas. Decision makers should give considerable importance and weight to the Section 16, 66 and 72 statutory objectives. The National Planning Policy Framework (2024) says that great weight should be given to the conservation of a designated heritage asset and clear and convincing justification given for any harm to or loss of significance. Paragraph 215 states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Policy HC1 of the London Plan (2021) and Policy LP3 of LP33 require that development preserves or enhances the character of designated heritage assets. The impacts of the proposed development on these heritage assets are considered as follows, as required by the above identified legislation and policy.
- 6.3.99 We note that the following comments should be read in conjunction with the above “Significance of Area and Buildings” paragraphs from 6.3.5 onwards.

Heritage impacts on the South Shoreditch Conservation Area

- 6.3.100 A large proportion of the buildings on the site would be demolished as part of the proposal and replaced with new buildings of a completely different scale and type. The buildings that would be lost all date from the post war period or later and none are considered to be of architectural or historic interest in their own right, but they are attractive modest buildings that reflect the period in which they were built. They generally follow the established pattern and scale of development in the conservation area, respecting historic plot layouts and boundaries and forming part of a diverse historic townscape that has evolved over a long period. The extent of the proposed demolition and replacement by new buildings of a very different layout, form, function and scale would cause harm to the character and appearance of this part of the conservation area. The historic pattern of development and the dense, evolved character with its fine grain and connection to specific industrial uses would be significantly eroded. The new buildings would appear incongruously large in terms of both height and footprint. The Verso building would be the most obvious departure from the established character, but the smaller frontage buildings would also have much larger footprints and a noticeable height increase.
- 6.3.101 Existing buildings identified as making a positive contribution to the character and appearance of the conservation area would be retained. However, Conservation officers note significant concerns about the relationship between the retained buildings at 13-21 Curtain Road and 52-56 Scrutton Street and the new development. Both buildings would be subsumed into much larger structures with additions to the

rear, sides and roof so that the original form of the buildings would no longer be legible and their integrity as surviving historic structures would be significantly compromised. Although care has been taken to avoid 'facade retention', the result (at least in external views) would resemble a facade retention approach because the historic facades would be subsumed within a much larger structure.

- 6.3.102 The impacts described above would be very noticeable within the development site and in the adjacent streets, but would be localised to that area only. However, the proposed Verso building (as amended in September 2025), would be visible over a much wider area because of its height. This impact is well-illustrated in the HTVIA. It isn't possible or necessary to capture every single view of a building in this type of analysis, and the range of views presented gives a good idea of how visible the building would be and how it would appear. It would be visible to a greater or lesser degree from many of the streets and spaces in the southern part of the conservation area near the site (as illustrated by the ZTV analysis map in the HTVIA figure 2.1), and there would be areas of visibility (especially on main thoroughfares plus other isolated areas) throughout the conservation area and beyond. In the immediate surrounds of the site and in many of the close or medium range views, the building would appear very tall, bulky, overbearing and incongruous. It would be a fairly dramatic departure from the consistent scale that characterises the South Shoreditch Conservation Area, and would considerably erode some of the important characteristics that contribute to the significance of the area including the consistent scale, urban grain and building types.
- 6.3.103 It is recognised that there are existing tall buildings in the area and near to the boundary of the conservation area (particularly to the south and east) but these do not contribute to the special character of the conservation area, and in some cases they detract from it. There is potential for additional harm as a result of another tall building, and the views in the TVIA make it clear that there would be a noticeable additional impact compared with the visibility of tall buildings in existing views. None of the existing taller buildings are within the boundary of the conservation area, and it is a notable characteristic of this part of the conservation area that the scale and type of development within the boundary is very consistent and is much smaller in scale than adjacent areas outside of the boundary. It is a well-defined enclave with a very particular character, scale, and history, which contrasts with the more modern/larger scale areas that are immediately adjacent.
- 6.3.104 The harmful impacts of the amended Verso tower that are described in paragraphs 6.3.101 and 6.3.102 above are particularly apparent in the following views in the HTVIA:
- 1.1 and 1.2 Charlotte Road: The building would be very visible terminating the view along the street. It would appear incongruous and not in keeping with the very consistent scale of the street and the scale and type of buildings that are currently visible. This would cause harm to the character and appearance of the conservation area. The coherence of the proposed building is slightly improved in the amended design (compared with the originally submitted design) but its overall visibility and massing remain much the same.
 - 2.1 and 2.2 Curtain Road: The relatively consistent scale of the conservation area is apparent in these views and the proposed building would be a departure from this,

which would erode the character and appearance of the conservation area causing harm to its significance. There are larger buildings in the background but they are much further away than the proposed building and not within the conservation area itself. The impact on these views improves somewhat with the amended design (compared with the originally submitted design), especially 2.1, but it would still be quite noticeable in 2.2.

- 2.3 and 2.4 Curtain Road: These views very clearly show a major departure in scale and form compared with the surrounding context in the conservation area. The massing is better organised and more coherent in the revised design (compared with the originally submitted design) and this makes it slightly less overbearing, but the dramatic change in scale is still very obvious and is unimproved by revisions. This would cause harm to the character and appearance of the conservation area.
- 7.2 Worship Street: There is a very noticeable impact with the building appearing very imposing and dominant above the historic townscape. This would cause harm to the character and appearance of the conservation area and erode key characteristics that contribute to its significance. The impact on this view is somewhat improved in the revised version (compared with the originally submitted design), especially in terms of the coherence of the proposed building, but there would still be a very noticeable adverse impact.
- 8.1 and 8.2 Appold Street and Snowden Street: The very large scale of the proposed building compared with the existing buildings in the conservation area would be very clear from these view points. It appears very dominant and would be experienced as a significant departure from the established scale and form that characterise the conservation area, causing harm to significance. The buildings in the foreground and right hand side in these views are outside of the conservation area and are somewhat larger than those within the conservation area, but it is the departure from the established scale and form within the enclave of the conservation area itself that is of key importance. The visibility of the proposed building in these views is reduced in the revised version (compared with the originally submitted design), but it remains visible and would still have a harmful impact.
- 15.2 and 15.3 Epworth Street: the building would be noticeable above the linear and consistent rooflines of historic buildings with visibility increasing as the view point moves eastwards along the street. It would appear incongruous and overbearing, causing harm to the character and appearance of the conservation area. There are existing larger buildings in this view but the proposal would be more towards the foreground of the view and would actually be within the conservation area. The proposed new development would also cohere with the existing tall buildings in the background in this view creating the appearance of a very large and incoherent mass on the skyline (whereas in the existing view the tall building in the background appears more slender, well-defined and coherent).
- 17 Phipp Street: The building would be very prominently noticeable in this view. It would be many times larger than any of the other buildings that are visible and would appear very overbearing, detracting considerably from the character of the existing townscape.

6.3.105 The impact on streets immediately adjacent to the development site and views from within the site itself are less well-illustrated in the HTVIA, but this is to be expected as

this kind of AVR analysis has limitations when analysing very close-range views. The submission provides two supplementary close range views in the 'Additional Views Report' dated August 25 which help to illustrate this close range impact: one from Scrutton Street and one from Worship Street showing the view of the Grade II* listed Webb Terrace (discussed separately below). There will be other areas in the immediate vicinity of the site where the tall building will also be visible and which are not captured in the HTVIA. Based on site visits and VuCity analysis, Heritage officers consider that these include:

- From Revolution Road and the public space immediately behind 24 and 26 Curtain Road. The new building will appear behind the roofline of the two listed buildings.
- From around the junction of Worship Street and Clifton Street, where the building is likely to appear above and behind locally listed buildings.

- 6.3.106 The adverse impacts described above would erode the consistent character and appearance of the conservation area, and would (in a general way) affect the setting of the various listed and locally listed buildings within the conservation area.
- 6.3.107 The area around the Grade I listed Church of St Michael and grade II* listed St Michael's Church School is identified in the ZTV analysis (figure 2.1 in the HTVIA) as an area from which the proposed development would be visible. This relationship is not explored with view modelling in the HTVIA but officers are satisfied that there would not be an adverse impact on the significance of this group. It is considered that the proposed development would be visible in some views from St Mark's Square, but the square forms a relatively enclosed and tranquil setting for the church with limited views out towards the busy urban environment beyond and it is considered unlikely that the addition to the skyline would be noticed. It would not impinge on views of or from the church itself.
- 6.3.108 Overall, it is considered that the harmful impacts to the significance of the South Shoreditch Conservation Area would be 'less than substantial' in the terminology of the NPPF and, cumulatively, would be towards the upper end of that range. The GLA considers that there would be "less than substantial harm at a middle to high extent to the significance of the South Shoreditch CA and Historic England characterise the harm as "towards the middle of the range of 'less than substantial' in the language of the NPPF". Given the rather imprecise nature of this summary assessment, which condenses a number of more specific assessments, it is considered that this demonstrates broad agreement between these parties.
- 6.3.109 These impacts would not be characterised as 'substantial harm' because there would be no demolition of buildings identified as making a positive contribution to character and appearance, work to retained historic buildings would be largely appropriate (with the exception of the specific concerns mentioned above about the impact on 13-21 Curtain Road and 52-56 Scrutton Street), and the adverse impacts would be somewhat localised (with little adverse impact to the northern parts of the conservation area away from the site).
- 6.3.110 Nevertheless, the impacts are not minor either, and officers do not agree with the assessment in the heritage statement, which identifies only very minor and localised adverse impacts. It is considered that there is clear evidence that the proposed tall building would be quite widely visible in the southern part of the conservation area

where it would appear incongruous and overbearing in multiple views. The harmful impacts would not be limited to townscape and views. There would also be substantial changes to the built form of the conservation area, affecting much of the entire urban block, with extensive demolition of existing buildings and replacement with new buildings would be a significant departure from the established scale, layout, grain and building type. Specific concerns are raised about the unsatisfactory relationship of these large new buildings with two of the retained historic buildings which would become subsumed into the new development.

Benefits of Restoration

- 6.3.111 The Borough's Heritage Officers have also considered whether there would be any enhancements to heritage significance in the conservation area as a result of the proposals. The submission suggests that the provision of a publicly accessible space and route through the centre of the urban block would constitute a heritage benefit because people would more readily be able to see and enjoy the historic structures in the interior of the block (which would be mainly the backs of buildings). The centre of the site is currently open but is not publicly accessible, so the proposal would provide more opportunities for more people to see it. It would be possible to view the rear of 91-101 Worship Street from some locations. It is of considerable architectural interest and isn't currently visible. The rear of 44-46 Scrutton Street is also of architectural interest and could be enjoyed by those using the open spaces in the centre of the block. However officers consider this to be a very minor heritage benefit. It would not be the restoration of a feature of the historic townscape because there wouldn't have been such a public route historically. There would not be much to see that would be of architectural or historic interest other than the two buildings mentioned, and the interior of the site would be so radically changed as a result of the demolition and redevelopment that little of its historic character would remain to be enjoyed. Instead the space would be dominated by a very large tall building grounding in the centre of the site.
- 6.3.112 There would also be some benefits to the character and appearance of the conservation area resulting from the repair and refurbishment of 91-101 Worship Street, which is discussed in detail below.
- 6.3.113 There would be various other place benefits resulting from the proposal including the creation of new public spaces and improvements to the public realm, as discussed above. However, these are considered to be general benefits (discussed elsewhere) rather than specifically enhancements to heritage significance. Where the proposed new buildings are of high quality, this would also be considered a general benefit rather than an enhancement to heritage significance. Heritage officers do not consider that the existing buildings on the site detract from the character of the area (and in many ways they are complementary) and do not consider their removal and replacement to be an enhancement. The proposed new frontage buildings are likely to be finished to a high quality and might improve upon the existing street frontage in some respects, but it is considered that the unsympathetic layout, footprint and scale would prevent them from enhancing (or even preserving) the significance of the conservation area.

Impact on 91-105 Worship Street

- 6.3.114 The proposal includes conversion of the grade II* listed terrace at 91-101 Worship Street and the adjacent grade II listed 103 and 105 Worship Street into houses (with a small amount of retained commercial use) and the repair and refurbishment of the buildings. It includes some layout changes, removal of outbuildings and modern extensions at the rear, and changes to site boundaries and layout at the rear to create a new mews development and courtyards, and repair of the stone drinking fountain to restore it to active use.
- 6.3.115 The repair, restoration and conversion works (many of which are internal and are dealt with under a separate LBC) are generally appropriate and are supported including the layout and general approach. The level of detail provided with this and the corresponding LBC application is less than would normally be expected for a project of this type (especially given the degree of significance) and there appears to be inconsistency between the information in the listed building consent proposals which includes only minimal retrofit measures and the information provided in the sustainable design and construction statement about the thermal performance of the refurbished buildings which suggests extensive retrofit measures are intended (highlighted in the Sustainability comments). There is also insufficient detail about how the drinking fountain would be safely restored to public use.
- 6.3.116 If consent had been granted, it would have been essential to secure full details of the restoration work (including internal works) by condition since, in the absence of detailed information it is hard to make an accurate assessment of the heritage impacts, but the buildings are in poor repair and evidently in need of investment, so their sensitive restoration (including appropriate retrofit measures) would be a benefit in heritage terms and would support their long-term sustainable use. The removal of poor quality extensions, and restoration of previously altered internal plan form, and restoration of the drinking fountain would also be benefits.
- 6.3.117 However, there are some proposed changes to the terrace that are of concern. The multi-use design of the terrace, which was designed to incorporate commercial and workshop spaces, is an important and unusual characteristic that contributes to its special interest (and to the special character of the conservation area). Conversion of most of the units into single use dwellinghouses would erode this. While it is recognised that multi-use or live/work spaces do not easily fit within planning use classes and are not typically supported by the Borough because of the regularity with which they are lost to existing use certificates, nevertheless the loss of the multi-use aspect would result in some harm to significance.
- 6.3.118 The proposal would also involve reconfiguration of the rear yards to form a new courtyard and mews space, which would be a considerable change to the site layout and setting of the terrace properties and the way they relate to neighbouring sites. The terrace properties historically had narrow enclosed rear yards where the workshops were located. The proposed layout at the rear would be a departure from this and would erode the integrity of the group somewhat. The terraced properties would no longer have a well defined connection to their own rear yards, the original boundaries and curtilage would no longer be legible, and it would be more difficult to understand how the group of buildings was originally configured and used. While Heritage bodies have objected to the loss of an original building in the rear yard, this has been substantially altered over time. The Borough's Heritage officers consider that the existing structures in the rear yards do not contribute to significance except

in-so-far as they follow the original site layout. The buildings themselves appear to have been heavily altered or entirely rebuilt and do not resemble the original structures architecturally. Surviving historic fabric appears to be very limited and makes no meaningful contribution to significance. As such, no objection is raised to the demolition of the rear yard buildings. The concern is rather about the loss of the site layout, curtilage and boundaries.

- 6.3.119 The overall impact on the listed terrace as a result of their conversion would be mixed, with an enhancement to the significance of the buildings themselves as well as to this part of the conservation area arising from their repair and refurbishment, but some harm to both the listed building and their contribution to the conservation area resulting from the change of use and alterations to boundaries and site layout at the rear. There is also a degree of uncertainty about what the benefits and potential harmful changes would be because of the lack of detailed information about the refurbishment work.
- 6.3.120 These harmful impacts would be 'less than substantial' in the terminology of the NPPF. It is considered that the harm resulting from the change of use and boundary changes would be outweighed by the benefits of the restoration and conversion work (subject to satisfactory further details being provided).
- 6.3.121 It is also noted that the phasing of the development places all the heritage refurbishment of these buildings in the final phase of development. This ensures that the refurbishment would be very difficult to secure, further diluting the public benefit that can be ascribed to the refurbishment.
- 6.3.122 The larger elements of new development would have a harmful impact on the significance of the terrace because of changes to its setting. The principal concern is the visual impact of the proposed Verso building which would appear above and behind the terrace when viewed from Worship Street. The terrace has a very distinctive richly-detailed roofline that makes an important contribution to significance and to the character and appearance of the conservation area, and it is currently unbroken in this view (apart from some larger buildings visible at one side) so the group can be appreciated in an immediate street context that isn't too dissimilar from its original intended setting (at least in terms of scale and layout). The proposed building would be very prominently visible immediately behind the terrace in the principal view from the street, and would also be a very dominant and incongruous presence at the rear of the site and when viewed from within the historic terrace. This would be a considerable change to the character and context of the site and would erode the connection it provides to the past, causing harm to significance.
- 6.3.123 The harm resulting from the proposed tall building and wider redevelopment in such close proximity to the site would be classed as less than substantial, and relatively minor as it only affects setting and views. However, the only enhancement or heritage benefit resulting from the wider development would be the ability for people to view the rear of the terrace from the newly created spaces in the interior of the block (as described above). Heritage officers consider this to be a very minor benefit, and not capable of outweighing the harm caused by the tall building.

Impact on other assets in the wider area

- 6.3.124 As noted above, the proposed development would be visible from within the Bunhill Fields and Finsbury Square Conservation Area and would have the potential to affect its significance and the settings of numerous highly significant sites and structures within that area. Heritage officers note that there is no view in the HTVIA showing the impact of the proposal above the Wesley Chapel, or buildings of that group. Nevertheless, detailed analysis of the proposals suggests that there would be no harm to the significance of locations within the Bunhill Fields CA as a result of the scheme visibility, and there would be no significant visibility impacts to other assets in the wider area.

Archaeology

- 6.3.125 The proposal site lies within an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [78056] Shoreditch.
- 6.3.126 NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary.
- 6.3.127 NPPF paragraphs 212 - 215 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 216). Conservation can mean design changes to preserve remains where they are.
- 6.3.128 NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities. If preservation is not achievable then, for any grant of planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.
- 6.3.129 Historic England (GLAAS) were consulted on the application and initially objected to any approval prior to the carrying out of further exploratory works. They confirm that this is a complex, multi-phase site that, according to documentary sources has contained a burial ground since the 16th century, with this use continuing into the 17th, 18th and 19th centuries with the ultimate addition of a parish church. In March 2024 GLAAS therefore recommended a pre-determination evaluation and have considered the submitted report following the fieldwork (MOLA February 2025 v2).
- 6.3.130 GLAAS confirms that, following the excavation of three trenches by the applicants, there still remain several unknowns regarding the nature and extent of the archaeological remains that may survive, and their significance. If a large number of undisturbed late post-medieval burials survive they could potentially rise to high significance if extensive definable and undisturbed remains of the 16th century, or 17th century plague cemetery, are identified.

6.3.131 GLAAS have understood from communications with the archaeological contractor that these remaining uncertainties are unable to be addressed prior to the site being made available for demolition. As such, in their latest correspondence, GLAAS recommend that further evaluation is conducted by condition, with an awareness that the results of that phase could necessitate further, extensive archaeological excavation. There may also be a need to reassess the design of foundations in order to preserve any nationally significant material and this would also need to be controlled by condition.

6.3.132 As such, subject to a condition requiring a precommencement written scheme of investigation and any works necessitated by its findings, and a condition requiring details of a final foundation design, the proposal could be found acceptable in this sensitive location.

Conservation and Heritage Conclusions

6.3.133 The proposed Verso tower would be visible across a wide area and would be a noticeable addition to townscape generally and to the settings of a large number of heritage assets detailed in the scoping section of the HTVIA report.

6.3.134 It is considered that the proposal would cause harm to the significance of the South Shoreditch Conservation Area. The harm would be 'less-than substantial' in the terminology of the NPPF and the level of harm would be towards the upper end of that range. The harm would result from the demolitions of a large numbers of existing buildings across an entire urban block and their replacement with new buildings of inappropriately larger scale and grain, the erection of a bulky tall building that would be widely visible, and from the erection of large new buildings adjoining and around some of the retained historic buildings such that the scale and original form of the historic buildings would no longer be legible and only their facades would be appreciable.

6.3.135 The proposed tall building would be prominently visible in the setting of the historic terrace at 99-101 Worship Street, which would cause harm to its significance. This would also be classed as 'less than substantial' and would be relatively minor.

6.3.136 Enhancements to the significance of the conservation area and to the wider setting of 99-101 Worship Street would be limited and are not capable of outweighing this considerable harmful impact.

6.3.137 There would be a mixed impact on the significance of 99-101 Worship Street as a result of its conversion and refurbishment. The group makes an important contribution to the South Shoreditch CA, and so there would also be a corresponding mixed impact on the character and appearance of that part of the CA. The loss of the mix of commercial and residential uses (which is a key characteristic of the group) and changes to the site layout would cause some harm to significance, but this would be outweighed by the benefits of refurbishing the buildings to support their sustainable continued use (subject to satisfactory additional details being secured at a later date). Heritage Officers do not agree with the submission's finding that this aspect of the proposal would deliver a major heritage benefit capable of outweighing the identified harmful impacts of the wider development and tall building because, a) the impact is mixed rather than purely beneficial and, b) the impact would be very localised, while

the other harmful impacts identified would be widespread, substantially impacting the area as a whole.

- 6.3.138 In addition, the proposal to leave the refurbishment of these buildings to the last phase of development means that this aspect of the scheme would not have been secured, had this recommendation been for approval.
- 6.3.139 Great weight should be given to the conservation of designated heritage assets as set out above, and decision makers should take into account that several of the assets listed above are listed at Grade II* and Grade I and are therefore considered to have a high/exceptional level of significance.
- 6.3.140 As set out in the NPPF, decision makers should consider whether the harm would be clearly and convincingly justified in this case. In accordance with paragraph 215, the harm should be weighed against the public benefits resulting from the proposal. It is also relevant to consider whether the harmful impacts have been minimised and opportunities for enhancements to significance maximised (as set out in stage 4 of the four-stage process from Historic England GPA3: The Setting of Heritage Assets (2017) described above).
- 6.3.141 Historic England Advice Note 4: Tall Buildings (2022) provides principles to avoid or minimise impacts of tall buildings on the significance of heritage assets. These include taking a plan-led approach to tall buildings to determine their appropriate location; decision making informed by understanding of place, character and historic significance and tall building proposals which take account of local context and historic character.
- 6.3.142 While the site is not within a proposed Tall Buildings Zone in the emerging AAP the proposal site is identified as a site potentially suitable for a taller building in the draft and emerging site allocations. However, the height of the proposed building is considerably in excess of the height envisaged in the site allocations. Moreover, the development would fail to comply with several of the requirements for taller buildings set out in the Local Policy and the emerging AAP, particularly with regard to the impact on heritage assets and townscape. Officers consider that the additional height and very large scale of the current proposal depart from the 'plan led' approach recommended by HEAN 4 and is a considerable contributing factor in the harmful impacts identified.
- 6.3.143 The proposal has been developed with input from Council officers via the pre-application process but it is considered that there are outstanding concerns that have not been adequately addressed or resolved, especially regarding the height and/or bulk of the Verso building and its appropriateness in the context. Officers consider that harmful impacts have not been minimised as far as possible or that potential benefits have been maximised in line with HE guidance.

Microclimate Effects (Wind)

- 6.3.144 The submission includes wind modelling undertaken in a wind tunnel. Tall buildings generate gusts of wind by interrupting wind flows at high level and channelling to the street. This is most intense where a tower frontage faces the prevailing wind. Tall

buildings on narrow passages or streets can exacerbate issues where wind is forced through gaps.

- 6.3.145 The wind modelling shows existing, intermediate and completed scenarios. When the development is complete the modelling shows that the majority of the central yard and routes through would not be suitable for 'frequent sitting' or 'occasional sitting' in the windiest season, without mitigation, and there would be a worsening of the existing wind conditions in the central square of the Stage development, to an 'uncomfortable' level. The Stage courtyard would become unsafe in strong winds.
- 6.3.146 With suitable mitigation measures in place, the situation would improve at ground level. While only selected spots within the central square would encourage 'frequent sitting' in the summer months, the majority of the square would be suitable for 'occasional sitting', with the rest suitable for 'standing'. The entry points to the site are generally suitable for 'standing', with just one point where, in summer, it would only be suitable for 'walking'. As such, had this recommendation been for approval, it would have been necessary to condition suitable wind mitigation measures.
- 6.3.147 Above ground floor level, with the wind mitigation measures in place, only one of the proposed terrace levels would be unsafe. This terrace is on the Verso Building and is appropriately intended as an inaccessible biodiverse roof.
- 6.3.148 The assessment in the amenity section of this report is that the development would have a largely neutral impact on the surrounding streets.
- 6.3.149 In the intermediate stage following the construction of Phase 1, there would be an existing point of conflict in the south east access way to Curtain Road, where the wind would create uncomfortable conditions in winter. As such, additional mitigation would have been required by condition for the intermediate stage, in case further phases were not built.
- 6.3.150 An existing area that is unsafe in strong winds directly adjacent to 87-89 Worship street would remain unsafe following the proposed development. This is the undercroft entry point to Holywell Mansions/ Morris Mews and the alley route to the children's playground. Testing of the alley itself has not been undertaken in the wind tunnel but the computer modelling undertaken at an earlier stage does not suggest that it is a point of concern.
- 6.3.151 As such, since the impacts of the tall building (subject to wind mitigation measures) are largely felt on the site itself and would only impact the use of the on-site space and not the safety of pedestrians or site users, the wind impacts of the development are considered to be acceptable.

Communal Amenity Space:

- 6.4.152 Local Plan Policy LP48 requires 4m² of amenity space per employee and 14m² per new resident. The aim of this policy is to mitigate the impacts on existing outdoor communal space in the area from the influx of new residents and employees by providing on-site amenity space where possible. Where the policy targets are not met, it is expected that a

- 6.4.153 The GLA population yield calculator suggests that there would be 151 residential occupants of the site. Using the yield formula from the Hackney Planning Contributions SPD, 2446 people would be employed on the site.
- 6.4.154 The required level of communal space for the residential and commercial uses is therefore 11,898m²:
- 151 x 14m² = 2,114m²
 - 2446 x 4m² = 9,784m²
- 6.4.155 The planning statement suggests that “*The site offers over 2,840m² of new, vibrant public realm for residents, office workers, and visitors to enjoy.*” This appears broadly correct, the calculation leaves out the undercroft elements of the routes through the site and includes all other ground floorspace, including the residential courtyard to the west of Holywell Mansions, and the gated residential areas in front of Webb Mews and Morris Mews.
- 6.4.156 There is additional communal open space at the roof terraces of the commercial buildings that would provide around 3340m² for the use of employees. There are private balconies on the residential buildings that would provide around 415m² for the use of residents. This leads to an overall shortfall of around 5300m² of communal open space.
- 6.4.157 As such, were the policy requirement for a payment in lieu to be adhered to, the payment from this scheme would be £608,113. The estimated cost of the public realm works outside the red line is £1,300,000 as per the Transport section below. Requiring the full amount of payment in lieu in addition to those public realm works would impact the amount of Affordable Workspace and Affordable Housing that the scheme could deliver and thereby further reduce the public benefits of the scheme. It is sometimes the case that a scheme’s public realm works deliver space for residents and/or employees to sit and gather outside of the site boundary, thereby mitigating the impact of the additional people on-site. In this case, space is relatively tight and the impacts of the shortfall to policy targets are likely to be significant in respect of neighbouring amenity spaces such as Worship Square.
- 6.4.158 It is therefore considered that the volume of development proposed has exceeded what the site should be expected to accommodate in this location. The footprint of the proposed Verso tower in particular has reduced the space available for on-site communal space and the resultant shortfall in space available to employees and residents is liable to have significant impacts on existing outdoor amenity spaces in the neighbouring area. These impacts would be exacerbated by the lack of such spaces in Shoreditch. They would be further exacerbated by the windy condition of the central square within the development (see section above on wind impacts). We also note that the above calculations do not include the transient population of customers and pedestrians that it is hoped will use the ground level routes and spaces. The proposed reason for refusal is recommended to also note the proposed volume of development.

Play Space:

- 6.4.159 Local Plan policy LP50 requires 10m² of playspace to be provided for each child living in the development. The child yield of the development, using the GLA calculator, is 18.3.
- 6.4.160 Dedicated playspace of 58m² is provided to the west of Holywell Mansions in a small courtyard. In front of Webb Mews and Morris Mews are gated landscaped areas that could be considered suitable for doorstep play for very young children. These spaces are 332m² and 209m² respectively. On balance, the quantum of playspace is considered acceptable.

Urban Design, Conservation and Heritage Conclusions

- 6.3.161 The scheme is considered unacceptable in design, conservation and heritage terms. The public benefits are considered to be insufficient to outweigh the less than substantial harm that has been identified, whether it is considered to be within the middle or upper range of that harm. The application is recommended to be subject to the following reason for refusal:
- The proposed development by reason of its design, scale and positioning, would result in an incompatible and obtrusive development which would harm the character and appearance of the South Shoreditch Conservation Area and the wider townscape, as well as the setting of listed buildings, non-designated heritage assets. The excessive scale and volume of the development would adversely impact the microclimate of the onsite and adjacent public realm and significantly overshadow proposed residential accommodation. As such, the proposal is contrary to the guidance of National Planning Policy Framework (paragraphs 139, 215 and 216); and London Plan (2021) policies D3 (Optimising site capacity through the design-led approach), D6 (Housing quality and standards) and HC1 (Heritage conservation and growth); and Local Plan (2020) policies LP1 (Design Quality and Local Character, LP3 (Designated Heritage Assets) and LP4 (Non-Designated Heritage Assets).

6.4 Quality of Accommodation

Commercial Floorspace

- 6.4.1 In accordance with Local Plan Policy LP27, the Council requires the provision of well designed, high quality buildings and floorspace that is flexible / adaptable to accommodate a range of unit sizes and types with good natural light, suitable for sub-division and configuration for new uses and activities, including for occupation by small or independent commercial enterprises.
- 6.4.2 Overall, the design and layout of the proposed floorspace is of a high quality, is flexible, varied and would meet the needs of likely end users. There are also several levels of outdoor terraces across the buildings ensuring that access to a range of amenity spaces would be available for workers.
- 6.4.3 Subject to conditions to ensure the development was delivered to the standard currently proposed, the proposed quality of the office accommodation is considered to

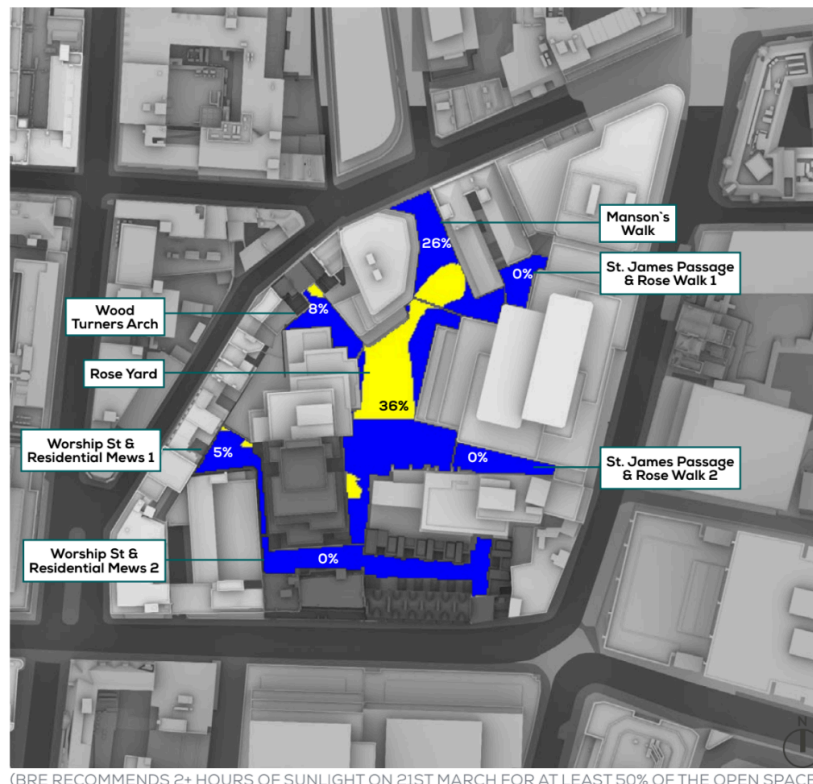
be acceptable.

- 6.4.4 Notwithstanding the above, no external or internal extract flues are proposed as part of this application, so a condition preventing the use of any of the proposed commercial units for the primary cooking that might be associated with a restaurant use, without the approval of appropriate kitchen extract flue details, would have been necessary in the event of an approval.

Residential Floorspace

- 6.4.5 New residential developments are expected to provide a good standard of amenity for future occupiers and demonstrate compliance with the minimum floorspace standards of London Plan policy D6 and the requirements of the Mayor's Housing SPG. LP33 policy LP17 references these standards.
- 6.4.6 The proposal is for a mixture of new build and refurbished dwellings, with the new build units largely in Holywell Mansions. The units would meet the minimum overall floorspace and headroom standards and all the newly built units would have access to private outdoor space.
- 6.4.7 Flats on the lower floors looking between Holywell Mansions and 87-89 Worship Street would have a very limited outlook.
- 6.4.8 The submitted daylight/sunlight report shows that only 54% of the proposed rooms would meet the BRE daylight targets. The significant impact of the proposed scheme massing can be seen at third floor level of Holywell Mansions where:
- Bedrooms 147 (82 lux) and 148 (95 lux) face the Verso tower and,
 - Bedrooms 151 (200 lux) and 152 (179 lux) are in the same (set back) location within the building but facing west.
- 6.4.9 In respect of sunlight, only 51% of the proposed units would have even one room that meets the target levels of sunlight (one and a half hours, on the equinox). At each floor of Holywell Mansions, the units that do not have any rooms that meet the target for adequate sunlighting are the east facing rooms, towards the proposed development.
- 6.4.10 No analysis has been submitted for the sunlighting of the residential balconies. Little of the ground floor level space within the site would receive two hours of sun on the equinox and this is particularly so for the play area (5%) and the doorstep playspace in front of Holywell Mansions and Webb Mews (0% and 0%).

OVERSHADOWING ASSESSMENT - PUBLIC AREA SUN HOURS ON GROUND - BRE TEST



(BRE RECOMMENDS 2+ HOURS OF SUNLIGHT ON 21ST MARCH FOR AT LEAST 50% OF THE OPEN SPACE)

- 6.4.11 The submitted daylight and sunlight figures are low and analysis of the submitted document suggests that this is largely a result of the scale of the proposed buildings, particularly the Verso tower. The acceptability of daylight/sunlight results is, in part, a consideration of whether proposed buildings represent typical development for the urban grain. Had this recommendation been for approval, and the townscape impacts considered acceptable, it would have been easier to support the impacts on the daylight and sunlight of the proposed residential units. While this is a central London location, it is also within a Conservation Area that is characterised by 3-6 storey buildings.
- 6.4.12 It is also noted that there are a number of existing units within the site that are to be refurbished as a result of part of the proposed development. As such, they are analysed in this section.

Accessibility of Residential Units:

- 6.4.13 London Plan policy D6 seeks to achieve the highest standards of accessible and inclusive design. To ensure a fully accessible environment, London Plan policy D7 requires 90% of all new housing to be built to the nationally described housing standard Building Regulations M4 (2), which replaced Lifetime Homes standards. The remaining 10% of the residential units should be wheelchair user dwellings, either Building Regulations M4 (3)(a) wheelchair adaptable and/or M4 (3)(b) wheelchair accessible.
- 6.4.14 The submitted planning statement confirms that all units are designed to comply with Building Regulations M4 (2) standards, with 8 of them (10%) as Building Regulations

M4 (3)(a) wheelchair adaptable, in line with the standards, and had this recommendation been for approval, a condition would have been recommended in this regard.

Noise Impact on Residential Units:

- 6.4.15 Planning application 2022/2280 at 103 Worship Street to change the use of the upper floors from Use Class E (Commercial Business and Service) to Use Class C3 (Dwellinghouses) for the creation of 4 no. residential units was refused and appeal APP/U5360/Y/23/3330377 on 2022/2280 (2023/0139 LBC) was dismissed. The Inspector's reason for refusal included that: *"In the absence of technical evidence and based on the site's proximity to the aforementioned venues, it is likely that the flats would be subject to significant levels of noise and disturbance."*
- 6.4.16 Subsequent to this refusal, a similar application was refused again under 2023/1704, which also included a reason for refusal that the *"proposed residential use and lack of noise mitigation measures would result in unreasonable restrictions being placed upon established noise and other nuisance-generating uses, threatening their viability and opportunity to continue growth as established night time venues. As such, the proposed change of use fails to comply with Policy D13 of the London Plan (2021)."*
- 6.4.17 We note that the current application is broader in its scope, including considerable demolition to No.103 and provision of much additional commercial floorspace elsewhere. As such, despite the three refusals and the inspector's report under appeal reference APP/U5360/Y/23/3330377, this application can be considered on its own merits. However we do note that the application does not overcome the reason for refusal of 2023/1704 relating to a "lack of noise mitigation measures [that] would result in unreasonable restrictions being placed upon established noise and other nuisance-generating uses, threatening their viability and opportunity to continue growth as established night time venues." The relevant planning policy is the Agent of Change principle under policy D13 of the London Plan. Had this recommendation been for approval, it would have been necessary to condition a level of soundproofing for the proposed listed building at No.103 that might come into conflict with the special heritage qualities of the building. While this could have been resolved post-planning, it makes the likelihood of the conversion of this building a matter of some conjecture.
- 6.4.18 For the other residential units, either because they are existing units, or because they do not have the constraints of listed buildings, are better located or are to be new build (such as Webb Mews adjacent to the Queen of Hoxton), it is considered that the noise of the surrounding city, including from the Queen of Hoxton, could have been adequately mitigated by conditions.

Residential Standard of Accommodation Conclusions

- 6.4.19 In conclusion, the standard of accommodation for the proposed residential units is significantly impacted by the scale of the Verso tower in particular. Had this recommendation been for approval, these impacts could have been considered acceptable. With the reason for refusal on townscape grounds, it is less possible to argue that the low levels of light to be experienced by the proposed properties are as a result of their central London location, rather than the specifics of the proposed development.

6.4.20 Secured by Design:

The applicants have met the Secured by Design officer, who has responded with a consultation response. Overall, the design is considered likely to result in an acceptable level of security and to discourage anti-social behaviour. A condition has been recommended to ensure that the Secured By Design Officer is consulted in respect of a Secured by Design award prior to any above ground works at the site and to ensure that the award is achieved.

Quality of Accommodation Conclusions

- 6.4.21 For these reasons, the proposed standard of accommodation for future employees is considered to be acceptable. For future residents, the floorspace that has been created is considered acceptable but there are significant impacts on the quality of the dwellings resulting from the massing of other elements of the scheme.

6.5 Transport and Servicing

- 6.5.1 The submission includes a Transport Assessment (TA) as part of the application that includes an Active Travel Zone Assessment (ATZ) and nighttime ATZ.
- 6.5.2 The application provides a detailed description about the characteristics of the local transport network. The main road network carrying through traffic in Shoreditch forms part of the TLRN which is controlled by Transport for London (TfL). This includes the A501 (Old Street), A1202 (Great Eastern Street) and A10 (Shoreditch High Street). TfL should be consulted on the application.
- 6.5.3 The site boasts a Public Transport Accessibility Level (PTAL) of 6b, the highest possible rating, due to its proximity to several major stations, including Shoreditch High Street Overground station (7–9 minutes' walk), Old Street Station (London Underground Northern Line and National Rail, 8–9 minutes' walk), Liverpool Street Station (London Underground, London Overground, National Rail, and Elizabeth Line, 10 minutes' walk), and Moorgate Station (approximately 10 minutes' walk). Furthermore, the local area is served by a strong bus network with 11 routes operating nearby at high peak hour frequencies.
- 6.5.4 The proposed development is located within Hackney Parking Zone B that operates between 08:30-Midnight, Monday to Saturday. The application provides a detailed breakdown of the total number of on street parking spaces available.
- 6.5.5 Cycleway 1 (CS1) is located only a short distance from the site and provides a strategic cycle connection between Liverpool Street and Stoke Newington. This is a key concern for the application. Paul Street has been a particular cause for concern in terms of cyclist safety. The protection of cyclists, pedestrians and vulnerable road users must be paramount throughout the planning application process.

Trip generation, car and cycle parking

- 6.5.6 The submission provides a trip generation assessment as part of the 2024 TA and an amended version in September 2025. The trip generation assessment was generated

using the Trip Rate Information Computer System (TRICS). This provides comparable transport data from similar land uses to estimate a total number of trips.

- 6.5.7 The application provides the trip generation for each of the use classes and servicing based on the AM and PM peaks. This is a limitation of the application, since the trip generation should show the existing, proposed and net trip generation for all person trips / all uses across the day.
- 6.5.8 At the time of submission, the overall model for all proposed uses (Office, Residential, Retail/Other Class E, and Sui Generis) estimated a total of approximately 7,992 two-way person trips daily. The modal split is heavily weighted toward non-car travel, consistent with transport and planning policy objectives.
- 6.5.9 Public transport modes accounted for the majority of estimated daily movements, specifically 2,802 trips by Rail/Overground, 2,590 trips by Underground, and 997 trips by bus. Active travel modes represented the next largest category of trips, comprising 730 daily cycle trips and 670 daily pedestrian trips.
- 6.5.10 The analysis of net change, comparing proposed trips against existing site uses, forecasts a net increase of 692 two-way person trips in the AM peak hour and 620 in the PM peak hour, with all growth occurring in sustainable and active modes. The scheme was forecast to result in a net reduction in car driver and passenger trips, with 47 fewer car trips in the AM peak and 42 fewer in the PM peak, relative to the baseline.
- 6.5.11 The amended development proposals in September 2025 show a small decrease in the number of development trips:
- Morning Peak (AM Peak): A decrease of 27 two-way trips (from 1,137 to 1,110).
 - Evening Peak (PM Peak): A decrease of 33 two-way trips (from 1,027 to 994).
 - Total Daily Trips: A decrease of 116 two-way trips (from 7,704 to 7,588).
- 6.5.12 Transport Officers note that the assessment may underestimate the overall trip generation and private vehicle use. As such, the implementation of a well managed travel plan and delivery and servicing plan to reduce private vehicle use and dependency is emphasised in the assessment below.

Car parking

- 6.5.13 The proposed development is car-free, aligning with the requirements of the London Plan and local policy LP33, which mandates car-free status for all new developments to reduce car use and promote active travel (refer to policy LP45 for details).
- 6.5.14 The site is located in a Controlled Parking Zone (CPZ B) that operates between 8:30 AM and midnight, Monday to Saturday.
- 6.5.15 The surrounding streets currently offer 81 legal parking spaces, which are divided into 38 Permit Holder bays and 39 Pay and Display bays. However, an external survey identified a significant issue with illegal parking, noting 72 instances across the site, with the majority occurring on Holywell Row (37) and Worship Street (17). The proposed development seeks to address this by incorporating unused on-street parking spaces into the s278 highways and public realm works.

- 6.5.16 A CPZ exclusion to restrict parking permits being issued is recommended for all users of the proposed site (except those with a blue badge).

Blue Badge Car Parking Spaces

- 6.5.17 LP33 states that disabled parking should be provided in accordance with the London Plan. The London Plan states that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.
- 6.5.18 The scheme proposes 9 dedicated on-street disabled parking spaces (Blue Badge parking) and states that this provision is in line with the London Plan and Hackney Local Plan policies. These bays would be located on-street and would be secured through a Traffic Order and an S278 agreement. The bays are positioned to be within 50 meters of the front entrances of each relevant building.
- 6.5.19 The submitted TA justifies the lack of on site Blue Badge parking bays, the submitted TA justifies in terms of the cost of constructing multiple basement areas for a small number of disabled spaces, along with the impact on the townscape of parking entrances. The impact of additional basement space on the embodied carbon of the development, already large, could have also been factored into such a justification in this instance and the constraints of the development site are noted.
- 6.5.20 Had this recommendation been for approval, a Parking Design and Management Plan (PDMP) would have been required prior to occupation to show that the site would be car free with the exception of the single Blue Badge spaces. It would show how the parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.

Cycle parking

- 6.5.21 Hackney Policies LP41 (Liveable Neighbourhoods), LP42 (Walking and Cycling) and LP43 (Transport and Development) in Local Plan 2033 highlight the importance of new developments making sufficient provisions to facilitate and encourage movements by sustainable transport means. Local Plan 2033 policy LP42 requires that cycle parking shall be secure, accessible, convenient, and weatherproof and will include an adequate level of parking suitable for accessible cycles, tricycles and cargo bikes. Two-tier cycle parking is generally not supported. Cycle parking should also be provided in line with Hackney's Sustainable Transport strategy.
- 6.5.22 Following the reconsultation, the updated application proposes a total of 1,179 cycle parking spaces, split into 953 long-stay and 226 short-stay spaces. The proposed scheme falls significantly short of the number of spaces targeted by LP42:
- *Office Underprovision:* For the largest land use, the Office (Use Class E) floorspace, the LP42 standards require 1,226 long-stay spaces and 126 short-stay spaces, for a total of 1,352 spaces. The proposed scheme provides only 784 long-stay spaces (a deficit of 442 spaces) and 56 short-stay spaces (a deficit of 70 spaces) for the primary land use.

- *Residential Underprovision:* There is a shortfall of 10 spaces against the LP42 standards.
- *Inclusion of Non-Standard Spaces:* The proposal also includes folding bicycle lockers, which are not supported, toward the overall required quantum.

6.5.23 These issues were noted at the time of the first submission. However, the amended scheme shows a decrease in the overall number of spaces.

6.5.24 In addition, it is considered that the design and type of cycle parking fail to meet Hackney's expectations for high-quality provision:

- *Reliance on Two-Tier Stands:* The proposed mix is considered unacceptable, relying heavily on the 75% of two-tier stands. This type of rack is generally discouraged by Local and London Plan policies, which prioritise user convenience and accessibility. The proposed residential aisle widths between the two tier stacks also do not meet the 2.5m minimum of the London Cycle Design Standards, never mind the best practice target of 3.5m.
- *Inadequate Accessible Parking:* The design includes only 17% Sheffield stands (single-tier) and only 5% accessible Sheffield stands for non-standard cycles. Transport officers note the shortfall from the standards of Hackney's Sustainable Transport strategy, which requires one accessible cycle parking space for every 25 cycle parking spaces (or part thereof) in schemes providing more than 25 spaces.

6.5.25 For these reasons, Streetscene officers have confirmed that they do not support the application.

6.5.26 The position within the application is that a quantum of cycle parking would be provided that is in line with the standards of the London Plan, rather than Hackney's Local Plan. It is accepted that the local quantum requirement is higher than the London Plan. This is reflective of local priorities and the success of cycling in Hackney in recent years. However, the relevant London Plan policy (T5, Cycling), requires conformity with the London Cycle Design Standards. A lower overall quantum of cycle spaces might therefore be explained by a high quality of those spaces in respect of, for example, a good proportion of single tier stands, and functional aisle widths where two tier parking is proposed. It is the conclusion of this assessment that the submission's reliance on the London Plan policy is therefore undermined by the low quality of the cycle spaces that are provided.

6.5.27 Had this recommendation been for approval a policy-compliant cycle parking plan would have been required by pre commencement condition. This condition would require details of the number, layout, foundation, stand type, and spacing of the cycle provision. With this condition it would have been incumbent on the applicant team to improve the quantum and quality of the proposal in this respect, prior to the commencement of development, ensuring that the existing buildings were not demolished before the acceptability of the cycle provision had been shown.

Electric Vehicle Car Club and Car Club membership

6.5.28 Although a car-free development is supported, it is recognised that there may be some need for occasional vehicle use.

- 6.5.29 To encourage occupants to travel by sustainable modes, a contribution towards the introduction of an Electric Vehicle Car Club (EVCC) would be required in a legal agreement. The estimated cost of this is £10,000.
- 6.5.30 All future residents should be provided with a car-club membership and driver credit in any legal agreement. This should be equivalent to £60 free membership and or driving credit to a registered car club provider.
- 6.5.31 The S106 car club contribution clause would state: 'A credit equalling a minimum monetary value of £60 per new residential unit made available, to the first occupant of each new residential unit, as a contribution towards their car club membership fee and/ or driving credit.'

Use of the Public Highway

- 6.5.32 The application includes an area at the corner of Scrutton Street and Curtain Road where the site boundary encroaches onto the public highway. This area is relatively small and the submission relies on an agreement to be reached with the Borough's Highways team to stop up the land and allow it to be used within the development. This would form part of a separate agreement, outside of this permission.
- 6.5.33 The Borough's Streetscene team have agreed to stop up this area of land (as shown in the attached technical note), with the proviso that the surrounding Highway may first have to be altered to ensure pedestrian capacity and safety, and footway accessibility are not impacted. Such alterations might include realignment of the kerbs or repositioning the telephone box.
- 6.5.34 There would be fees payable for designing, consulting and implementing any alterations involved in the stopping up, alongside agreement over the value of the stopped-up land.

Travel Plan

- 6.5.35 A Framework Travel Plan Statement has been submitted as part of this application. A full Travel Plan would be required to establish a long-term management strategy that encourages sustainable and active travel. This would be secured through the s106 legal agreement inclusive of financial contribution towards the monitoring of the Travel Plan of £9,000.

Construction Management Plan (CMP)

- 6.5.36 Construction movements are a key concern for the application. Pedestrian, cyclist and vulnerable road user safety must be prioritised at all times. A framework CMP has been submitted as part of the application. Given the nature and location of the proposed development a Construction Management Plan (CMP) would need to be provided by condition to mitigate the negative impact on the surrounding highway network.
- 6.5.37 To effectively monitor the final CMP the base fee of £17,500 would be required via the s106 legal agreement.

Delivery and Servicing

- 6.5.38 LP33 states that new development must incorporate designated spaces for deliveries within the boundary of the development, where appropriate and provide Delivery and Servicing plans which encourage provision for low-emission, consolidation and last mile delivery modes.
- 6.5.39 The TA states that the final landscape plan and detailed design of the on-street servicing arrangements are still to be finalised. The application proposes a mixture of onsite and on street servicing. A dedicated off-street servicing yard is proposed, accessed via Curtain Road. The application states that the landscaping proposals will include a Road Safety Audit (RSA) and this should include any new vehicular access points.
- 6.5.40 The application submission shows a large scale delivery and servicing impact. It states that there would be an estimated 188 delivery and servicing trips per day. The net increase in delivery and servicing vehicle trips is an increase of 116 trips per day with 17 trips per peak hour.
- 6.5.41 The application states that the use of cargo bike deliveries would be encouraged and would be permitted to service during the peak hours. Cargo bikes would make use of on-site mobility hubs or the dedicated servicing areas, that would offer facilities to enable for the safe and efficient use of cargo bikes within the site.
- 6.5.42 The TA and Delivery and Servicing Plan (DSP) propose a large scale and relatively complicated strategy. Streetscene officers are supportive of a number of elements of these proposals but would require further mitigations, including financial contributions and agreements to limit overall vehicle movements.
- 6.5.43 The TA states that a number of other measures will be included in the Delivery and Servicing Plan and are discussed further in Section 8. Measures to be considered would include the following:
- Cargo bike spaces and docks within the servicing yard or on street.
 - Parcel lockers for staff and visitors / residents.
 - Last mile connectivity.
 - Mobility hubs.
 - Shared procurement measures to limit and consolidate suppliers.
- 6.5.44 Had this recommendation been for approval, agreement from the applicant would have been required that the final arrangements would be funded through developer contributions via s106 and s278 agreements. This would include a £2,000 monitoring fee.

Essential Highways Works and Public Realm

- 6.5.45 In accordance with Local Plan policies and London Plan policies SD4 (Central Activities Zone) and T2 (Healthy Streets), new developments and their associated transport systems should contribute towards transforming Hackney's places and streets into one of the most attractive and liveable neighbourhoods in London. LP41 states that new development should improve the pedestrian environment and

contribute towards achieving a world class public realm linking the site to transport infrastructure.

- 6.5.46 Paul Street has been a particular area of concern for road safety and this forms part of cycle route CS1. Streetscene has received a number of complaints and concerns from residents in this regard.
- 6.5.47 The submitted Active Travel Zone (ATZ) assessment identifies a number of improvements and recommendations for key routes to and from the site. For example, for route 1 to Liverpool Street, pedestrian and cycle crossing facilities are suggested at the eastern end of Worship Street to prevent collisions and increase safety. The TA states that tactile paving and dropped kerb crossings should be implemented at the recommended location for varying levels and types of disability, including visual impairment.
- 6.5.48 The principle of these proposed improvements is welcomed by Streetscene, who have provided an estimate of £1,520,000 for the essential Highways Works.
- 6.5.49 The application drawings show works to the public highway outside the red line boundary. Significant uncertainties remain regarding the feasibility and optimal placement of build-outs and rain gardens, particularly due to the complexities associated with utility apparatus in these densely occupied streets. However the principle and general scope of these improvements is accepted and the estimated cost of the work is £1,300,000. Detailed design work, underpinned by surveys of subsurface infrastructure, would be undertaken by Streetscene officers in the event of an approval and would be subject to further public consultation in the usual manner.
- 6.5.50 Transport for London have noted an anticipated increase in use of the Windrush Line at Shoreditch High Street and the forecasted overcrowding at that station by 2029 and stated that this development would contribute to congestion at the station. The planned development around the station will safeguard land for a new entrance and improved vertical circulation. The applicants have confirmed that they would be willing to contribute £250,000 towards the delivery of those works, which would have formed part of the legal agreement for this application.
- 6.5.51 Transport for London have also sought a £750,000 legal agreement contribution towards a TfL A10 highway improvement scheme, consistent with recent agreements for nearby developments at 201–207 Shoreditch High Street and Shoreditch Island. The applicants have agreed to pay this contribution but Officers note the distance of the application site from the A10 and the reliance of the submitted transport strategy on sustainable modes of travel. Given the competing priorities at this site, including Affordable Workspace, and the inconclusive, disputed, findings of the submitted viability report, had this recommendation been for approval it would have been necessary to consider whether this payment would have been the best use of the resources available.
- 6.5.52 Transport for London have also sought a £100,000 legal agreement contribution to 'safeguard' space for a cycle hire dock. Had this recommendation been for approval, it would also have been necessary to consider whether this space would have been better utilised for street widening build-outs within a public realm scheme that

provided spillover seating space for office workers, given the shortfall in on-site communal space.

Refuse Strategy

- 6.5.53 The Borough's Waste team has confirmed that the waste strategy is well thought out and is largely in line with guidance. There are slightly longer journeys to the bin store for some residents than the 25m guidance but, as the strategy says, this is offset by the bin store being on the journey to the exit, and that assisted collections would be provided if needed.
- 6.5.54 The waste presentation areas are within 10m of the parking areas for collection vehicles, in line with guidance. The Waste team confirms that it would not have an objection to the arrangement, so long as all bins are moved to the waste presentation areas from the communal waste stores. The applicant has suggested during the course of the application that this would not be the case for Communal Waste Store 4 but there is no reason why it could not be controlled by condition, as would have been recommended if the application had been otherwise acceptable. On that basis, the proposal would be considered to provide suitable waste and collection servicing arrangements.

Transport Summary

- 6.5.55 The proposed development is considered unacceptable, as currently presented, with respect to the quantum and quality of cycle parking. A pre commencement condition would be necessary to ensure the development could be improved in this regard, and would not give rise to any adverse impacts to the surrounding highway network.
- 6.5.56 The Delivery and Servicing arrangements require further work and it would have been necessary to agree the provision of further details and developer contributions through the s106 and the s278 process.
- 6.5.57 In relation to other Highways matters, the submission is considered acceptable. It is in a highly accessible location, would be car free and would provide highways and public realm works that are necessary but welcomed.
- 6.5.58 In the event of an approval conditions requiring the provision of cycle parking, demolition, construction and delivery/servicing plans would have been recommended, along with legal agreement clauses restricting future residents from applying for parking permits, Blue Badge spaces, compliance and adoption of a Travel Plan containing a Parking Design Management Plan and Highway Works.

6.6 Impact on Nearby Residential Amenity

- 6.6.1 London Plan policy D3 states that development should have regard to the form, character and function of an area, through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions and that they should deliver appropriate outlook, privacy and amenity. Policy D6 requires that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its

context. Local Plan 2033 policy LP2 is concerned with the amenity of neighbouring occupants.

Daylight, Sunlight and Overshadowing Assessment

- 6.6.2 The assessment of the daylight, sunlight and overshadowing impact of the proposal on nearby sensitive receptors is informed by a Daylight and Sunlight Review submitted in support of the application. The methodology adopted for the assessment of daylight, sunlight and overshadowing is set out in the 2011 Building Research Establishment (BRE) Guidance. In accordance with BRE guidelines and with best practice, the assessments undertaken considered primarily residential properties.
- 6.6.3 When assessing daylight to existing properties, the primary methods of measurement are vertical sky component (VSC); and No Sky Line (NSL).
- 6.6.4 The BRE Report sets out two guidelines for vertical sky component: a) If the vertical sky component at the centre of the existing window exceeds 27% with the new development in place, then enough sky light should still be reaching the existing window and b) If the vertical sky component within the new development is both less than 27% and less than 0.8 times its former value, then the reduction in daylight will appear noticeable to the occupants and more of the room will appear dimly lit. In this urban area, VSC levels of around 15% would be considered typical of the windows in the surrounding streets and is considered to be a reasonable rule of thumb when considering the retained levels of daylight to surrounding properties following the proposed development.
- 6.6.5 The BRE Report also gives guidance on the distribution of light in existing buildings, based on the areas of the working plane which can receive direct skylight before and after the new development. If this area is reduced to less than 0.8 times its value before, then the distribution of light in the room is likely to be adversely affected, and more of the room will appear poorly lit. This is referred to as the No Sky Line (NSL) analysis.
- 6.6.6 For sunlight, the primary method of measurement is annual probable sunlight hours (APSH) to windows of main habitable rooms of neighbouring properties that face within 90° of due south and subtend the new development at an angle of 25 degrees from the centre of the lowest window to a main living room. If a point at the centre of a window can receive more than one quarter of APSH, including at least 5% of APSH in the winter months, then the room should still receive enough sunlight. If these percentages are not met and the reduction in APSH is more than 20% of its former value, then the loss of sunlight will be noticeable.
- 6.6.7 BRE guidance is clear that it needs to be applied with regard to the site context. Sunlight and daylight target criteria as found in the BRE guidance have been developed with lower density suburban situations in mind. In denser inner urban contexts, sunlight and daylight levels may struggle to meet these target criteria in both existing and proposed situations. The target criteria cannot therefore be required for dwellings in denser inner urban locations as a matter of course, in line with guidance set out in paragraph 1.3.46 of the Mayor of London's Housing SPG.

- 6.6.8 In addition, the guidance clarifies that the impact of balconies and other overhangs may be discounted from the calculation of daylight and sunlight impacts, since balconies (and their supporting structures) bring their own amenity but will constrain existing windows by overhanging them. The guidance therefore considers that this aspect of balconies should not be to the detriment of future development.
- 6.6.9 *Daylight Impacts*
- 6.6.10 The most relevant figures are in respect of VSC. NSL results have been provided but no floorplans to describe the figures have been submitted, making the information of less use. The submitted VSC results are considered sufficient to accurately assess the scheme.
- 6.6.11 Residential units external to the development site that would be significantly impacted in terms of reduced VSC may be found at:
- 24 Curtain Road.
 - 28 Curtain Road
 - 45 Curtain Road (Virgin Hotels)
 - The Stage (The Apartments)
 - 22-23 Holywell Row
 - 21 Holywell Row- why only 6 windows tested? 7 on the building.
 - 14 Holywell Row
 - Cosmopolitan House, 2 Phipp Street
- 6.6.12 At all other surrounding residential properties, either:
1. The amount of retained VSC is at levels that would be considered typical for inner London residences, or
 2. The reduction in VSC is not significant (less than 20%), or
 3. The absolute VSC loss is so small as to be considered insignificant.
- As will be seen in the detailed breakdown of the significantly affected properties, below, there are not a high number of existing units that have their daylight affected beyond these three metrics.
- 6.6.13 The submission also provides a 'cumulative' impacts analysis but there is only one additional development on that analysis (9 Hewett Street). At the time of writing this report, the Hewett Street building is not yet substantially complete. It is considered that, owing to the location of that development and its relatively small size, the submitted 'cumulative' analysis does not alter the findings of the assessment below and, for the sake of concision and clarity, the figures referred to below are all from the 'Existing vs Proposed' scenario presented in the submission.
- 6.6.14 Taking the properties where daylighting *would* be significantly affected, in order:
- *24 Curtain Road.*
All the facing windows of this property would see very substantial reductions to their VSC, from a good level of daylighting (18-27%) down to mid single figures (5-6%). There are three properties, at first, second floor and while they are dual aspect, the windows to the rear are already impacted by the Stage development. 70-89% of NSL is also lost.

- *28 Curtain Road (Horse and Groom)*
All the facing windows of this property would see very substantial reductions to their VSC. There is one, second floor residential property at this property and this is the only property that has been tested. The VSC would reduce from a very good level of daylighting (27-28%) down to mid single figures (6%).
- *45 Curtain Road (Virgin Hotels)*
There are very significant impacts to the daylight of all the facing windows of this property but, as a hotel, the rooms are less sensitive to these impacts than permanent residences would be.
- *The Stage (The Apartments)*
There are significant impacts to the windows that face the proposal site. Up to 12th floor level such windows are hemmed in by the other buildings of the Stage development and rely on the 'gap' over 24-26 Curtain Road for a longer outlook. While this gap would now be filled in by the Verso tower, it is the design of the Stage development itself that has caused much of the problem.

From the 12th floor upwards, the facing windows become less hemmed in by the existing buildings and the impacts are, with some exceptions, broadly in line with the BRE guidelines.

When considering the acceptability of these impacts, we note that the Stage apartment block is itself a tall, wide building set amongst bulky mid rise buildings from the same development. While no formal mirror test has been submitted, the proposed buildings do not appear to impact the Stage apartment block to a significantly greater extent than the Stage apartment block impacts them.

- *22-23 Holywell Row*
Facing windows would be significantly impacted, losing 32-49% of their VSC, with particularly pronounced impacts at the second floor where the retained VSC would be below the mid teens. However, this is a dual aspect maisonnette. While no figures have been provided for the windows facing away from the development, these windows face onto a more typical scale of development and might be expected to show somewhat better results. An objection to the proposals notes that the submitted Daylight/Sunlight report does not identify the use of the second floor correctly. As such, and following desktop study, this report assesses the second floor as being in residential use, including a living/kitchen/dining area.
- *21 Holywell Row*
There are 7 facing windows, only 2 of which have been tested (W3/F01 and W2/F03). However, from the submitted data it is clear that all facing windows will be significantly affected. Nevertheless, since the planning record suggests that the upper floors are all one unit that has its main outlook in the other direction, towards the street, these impacts can be considered acceptable.
- *14 Holywell Row*
Facing windows would be significantly impacted (up to 44%) but they serve a sole, multi-level residential unit, which has dual aspect. The street facing windows would

continue to receive good levels of daylight and the impacts on the daylight of this property are considered acceptable.

- *Cosmopolitan House, 2 Phipp Street*

While Cosmopolitan House is a sizable residential block, nearly all of its windows face away from the proposal site. Of the four windows that do face the site, one is significantly affected (a 42% reduction in VSC to a living room and this impact can, in part, be attributed to the location of the room below an existing balcony. All other windows at the building retain VSC levels above the mid teens and the majority are hardly affected at all.

6.6.15 The above analysis shows that there are not a high number of existing properties that have their daylight severely affected as a result of the proposed development. It is difficult to conclude that the impacts to 24 and 28 Curtain Road are 'acceptable' but these represent only four residential units. It is the conclusion of this report that, had the proposal been otherwise acceptable, it would be unreasonable to refuse the scheme on the basis of the severe daylight impacts to these four units, or the lesser impacts to other surrounding properties.

6.6.16 *Sunlight Impacts*

6.6.17 At all neighbouring windows the impacts to APSH are either minor (less than 20%) or the retained level of sunlight remains good, except from the following properties:

- *45 Curtain Road (Virgin Hotels)*
- *The Stage*
- *22-23 Holywell Row*
- *21 Holywell Row*
- *14 Holywell Row*
- *2 Phipp Street*

6.6.18 Looking at these in more detail:

- *45 Curtain Road (Virgin Hotels)*

This building sits directly to the north of the proposal site and would see very large impacts to the sunlight within its rooms. However, as a hotel building, these impacts are considered to be less significant and, in this instance, are considered acceptable.

- *The Stage*

At the Stage apartments there are significant impacts to the annual APSH, affecting a high proportion of windows at the lower floors (up to floor 6) and with impacts ranging from 20 to 100%. There is less impact to winter APSH at these floors because there is already no, or very little, winter sun. Beyond the sixth floor, the impacts gradually reduce and, as with the above assessment of daylight impacts to this building, given the height and bulk of the Stage tower, it would be considered unreasonable to refuse the current application on the basis of these impacts to a relatively small proportion of the Stage's rooms.

- *22-23 Holywell Row*

The impacts to the sunlight of this property are significant, it would lose over 35% of its yearly sunlight and over 21% of its winter sunlight at every room. The worst

affected room would lose 40% of yearly sunlight and 33% of winter sun. However, the retained levels of sunlight are reasonable for this inner London location, so while the impacts would be very noticeable, the overall impact need not be found unacceptable.

- *21 Holywell Row*

The sunlight would be significantly impacted (between 41 and 73% of yearly sun) at this property that already receives no winter sun. The submission appears to be incorrect because it shows 'room' results that are different from the 'window' results, despite that only one window in each room receives the sun but it is still clear that this would be a very noticeable loss for the occupants.

- *14 Holywell Row*

While there are significant impacts to two of the rooms at the property, the upper floor living room would still receive good levels of sunlight and the affected first and second floor rooms are not so significantly affected as to require refusal of the application.

- *2 Phipp Street*

As noted above, few windows at Cosmopolitan House face towards the development. One window (W13/F02) would be significantly impacted but this is largely as a result of the fact that it sits below an existing balcony.

6.6.19 For these reasons, the impacts to sunlight are considered to be acceptable.

6.6.20 Objections to the scheme noted that there were misidentified rooms (residential offices shown as bedrooms) and buildings (residential buildings shown as commercial) in the original submission. The tabulated figures in the addendum submission now seem correct in this regard and the above assessment has been carried out with the objections in mind.

Overshadowing of Private and Public Outdoor Amenity Areas

6.6.21 The submission shows that on the Equinox the central square would be overshadowed except for between the hours of 11am and 1pm. The central square within the Stage development to the east would be overshadowed at all times, as per the existing situation, though we note that the submitted daylight/sunlight document for the Stage showed that this space would be heavily overshadowed by that development itself. The roof terrace of the Virgin Hotel on Curtain Road to the north appears to be overshadowed by the proposed development until approximately 2pm.

6.6.22 On the summer solstice the majority of the central square in the site would be sunlit between the hours of 10am and 4pm. The proposal would remove most of the sunlight from the central square within the Stage from 4pm and all remaining sunlight from 5pm.

6.6.23 Existing residential balconies and terraces to the west of the site appear to continue to benefit from a level of sunlight that meets the BRE minimum criteria of 2 hours of sun on the Equinox.

- 6.6.24 These results show that the public benefit of the proposed central square is lessened by the quantum of development that is proposed. The square within the Stage is already so overshadowed, even on the Solstice, that it would be unreasonable to refuse this application on the basis of the additional overshadowing it would create. The impacts to other properties are considered acceptable, either because the properties would continue to benefit from the minimum BRE criteria, or because they are private, commercial properties and typically considered less sensitive to such impacts.

Overshadowing of Neighbouring Photovoltaic (PV) Panels

- 6.6.25 The submission includes details of overshadowed PV panels on neighbouring properties. The results show that all such overshadowing is within the target levels set by BRE guidance and can be found acceptable.

Daylight/ Sunlight Conclusions

- 6.6.26 Overall and on balance, the impact of the proposal on the daylight, sunlight and overshadowing of existing occupiers is considered to be acceptable and should be approved.

Privacy and Overlooking

- 6.6.27 The Council has no specific policy guidance on acceptable separation distances for overlooking. This is due to the differing established grain and density of the borough, the potential to limit the variety of urban space and unnecessarily restrict density.
- 6.6.28 In general, given that the site redevelops most of an urban block with new development, overlooking distances remain as before, across the respective roads that border the site.
- 6.6.29 The area where this is not the case is at the western edge of the block, where buildings that are not within the red line border the new buildings of the site. Most of these existing buildings outside of the red line house commercial floorspace and would not be significantly impacted by additional overlooking. Desktop study and site visits suggest that the following residential properties are exceptions:
- 22-23 Holywell Row
 - 21 Holywell Row
 - 14 Holywell Row
- 6.6.30 Nos.21 and 22-23 Holywell Row are contiguous neighbours to each other and are positioned directly adjacent to the proposed commercial building Holywell Court. In the existing situation a commercial building on the proposal site has ground and first floor windows directly and proximately facing these properties, and a small first floor roof terrace. As such, there is already quite a high degree of overlooking of the two properties. On the proposed plans, roof terraces are also proposed but are for second and third floor levels, which are the residential floors of Nos.22-23 and above the level of the existing building to be demolished. A condition to require screening of the terraces on the corner facing Nos.21 and 22-23 would have been appropriate. Similarly, Holywell Court is designed in open plan, with windows on each side, and direct, proximate overlooking at first floor level would have been to the detriment of

employees and residents alike, notwithstanding that it would not be significantly different from the existing situation. A condition requiring opaque glazing at the relevant corner at first floor level would have been appropriate too. The second and third floors are considered to be sufficiently set back that the recommended screening to the terraces would be sufficient to adequately mitigate overlooking.

- 6.6.31 At 14 Holywell Row there are residential windows at the site boundary. The current condition is of small commercial windows facing the residential windows at a distance of approximately 16m. As proposed, residential windows would overlook No.14 at a distance of approximately 16m at first floor level, with similarly positioned windows at the seven storeys above. This is an intensification of the overlooking currently experienced but, at a 16m distance and taking into consideration the existing situation, on balance, it is considered that this is insufficient grounds to refuse the application.
- 6.6.32 The development is therefore deemed acceptable in terms of prospective privacy and overlooking and so meets London Plan policy D3 and LP33 policy LP2.

Outlook/Sense of Enclosure

- 6.6.33 As above, most of the properties that immediately neighbour the site are commercial in nature, with residential properties at a greater distance. In line with the assessment above in respect of daylight/sunlight, there are properties that would be significantly more enclosed and would see a significant impact to their outlook by the proposed increases in massing but it is considered that there are not so many of these as to require refusal of the application.
- 6.6.34 As such, on balance, the impact of the scheme on the outlook and sense of enclosure of neighbouring occupants is considered to be acceptable because of the number of properties that would be significantly affected.

Noise/Odour

- 6.6.35 Local Plan policy LP2 seeks to manage the amount of noise and odour arising to and from a development, in line with surrounding environs.
- 6.6.36 The mixed use accommodation proposed as part of this development is deemed to reflect the existing surrounding context. The Council's Environmental Protection team have reviewed the proposal and have raised no objection, subject to internal ambient noise, soundproofing and plant noise conditions, coupled with demolition, construction and site environmental management conditions for the construction phase, which would limit noise and disturbance to surrounding occupiers. It is considered that the development would not add significantly to external noise levels caused by traffic or commercial uses. Conditions restricting the hours of commercial operation would have been recommended. A children's play area that is incorporated into the design is not so large as is liable to cause significant disruption. A considerate contractor's clause would have been included within the Legal Agreement to further protect adjoining residents.
- 6.6.37 The submission does not include a flue to any of the Class E units. As such, a condition would have been recommended to ensure no primary cooking will take place within any of the Class E units allowed under the permission, unless acceptable

kitchen extract flue details were provided. This would protect the amenity of existing and future residents from odour impacts that might otherwise have arisen.

Wind

- 6.3.38 The submitted documentation shows that the wind impacts of the proposal would not be significant on the surrounding streets, including the courtyard at 'The Stage', should the suggested wind mitigation measures be put in place. Scrutton Street would become windier but only to a level classified as 'standing', which is acceptable for a thoroughfare. Had this recommendation been for approval, it would have been necessary to require the wind mitigation measures by condition.
- 6.3.39 An existing area that is unsafe in strong winds directly adjacent to 87-89 Worship street would remain unsafe following the proposed development. This is the undercroft entry point to Holywell Mansions/ Morris Mews and the alley route to the children's playground. Testing of the alley itself has not been undertaken in the wind tunnel but the computer modelling undertaken at an earlier stage does not suggest that the alley would be an area of concern.
- 6.3.40 As such, subject to conditions in respect of mitigation design, the wind impacts of the development would have been considered acceptable in amenity terms.

Other Amenity Impacts

- 6.6.41 The submitted assessment of Solar Glare shows some limited impacts in this respect for drivers from certain directions, such as southwards along Phipp Street and eastward along Scrutton Street. The impacts are considered not to be significant and the proposal is considered acceptable in this respect.
- 6.6.42 The submission documents include information on the impact of light pollution from the development. The most impacted building would be the hotel opposite St James House. At this, and surrounding C3 residential buildings, the impact of light pollution is considered to have been adequately mitigated.

Amenity Conclusions

- 6.6.43 Despite the scale of the scheme, the low number of existing residential units within close proximity to the red line boundary means that the impacts are mitigated. As such, on balance, the proposed development is considered acceptable in terms of its impact on daylight, sunlight, overlooking, noise and odour, subject to the conditions and legal agreement clauses that would have been recommended.

6.7 Energy and Sustainability

- 6.7.1 Sustainability policies were significantly bolstered in 2020 by the adoption of Local Plan 2033, the London Plan and the corporate announcement within LB.Hackney of Climate Emergency. The development must meet the requirements of policies LP54 (Overheating) and LP55 (Mitigating Climate Change) of Local Plan 2033, as well as the requirements of London Plan policies SI 2 (Minimising greenhouse gas emissions) and SI 4 (Managing heat risk).

- 6.7.2 Hackney Council has declared their climate emergency and committed to become net zero carbon by 2040.
- 6.7.3 Due to the scale of the development, it is expected that the resource use, energy use and carbon impact in the demolition, construction, operation, maintenance and eventual end of life of the proposed development would have a significant and long lasting impact in Hackney from a sustainability, energy and carbon perspective.
- 6.7.4 The variety of proposed uses, massing, design, materiality and energy strategies across the 12 buildings makes the assessment in terms of the development's merits, shortfalls and policy compliance particularly complex.
- 6.7.5 As such, and as development that is referable to the GLA, it is critical the submission to provide accurate, detailed and consistent building specific supporting evidence to enable the London Borough of Hackney and Greater London Authority to carefully ascertain that minimum compliance with the relevant policies and guidance requirements are met or exceeded.
- 6.7.6 At validation stage, prior to consideration of a submission by statutory consultees, it is not always apparent whether submission documents are sufficiently detailed to serve the purpose for which they are intended. Despite extensive engagement throughout both pre-planning application and planning application stages, the submission documents with regard to Sustainability remain at the level that might be expected for an outline application. Officers consider that most of the questions and concerns raised during the process have been left unanswered or inadequately addressed.
- 6.7.7 The level of design information which has been submitted to date appears to align with RIBA Design Stage 2 (Concept Design). According to the RIBA Plan of Work, such an early submission is only recommended for outline planning applications. This is to acknowledge that further pre application engagement and coordination work is typically required for the design to meet the expected level of information required by a detailed planning application, which applicants are recommended to submit at RIBA Design Stage 3 (Spatial Coordination.) In January 2026, the applicant team provided a justificatory note in respect of the submitted level of detail, which states:
"For masterplans and strategic phased developments, it is common and appropriate at the planning stage to submit information at RIBA Stage 2 rather than the Stage 3 level of technical detail normally expected for a single-building detailed application. The Stage 2 submission is intended to establish the spatial framework, massing, land uses and the key design and sustainability principles for the whole plan area so the planning authority can properly consider the strategic planning, land use and principle of development matters at this stage [...] We are in RIBA Stage 2 and setting a strategy – therefore do not consider that every single building is needs to be modelled, to meet the terms of the policy."
- 6.7.8 As such, officers note that the submission must be considered indicative when it comes to the design of the submission. Elements such as the form and materiality of the buildings may be subject to change at a later date in order to meet policy targets in respect of sustainability.

- 6.7.9 Sustainability officers have noted that this is particularly relevant when it comes to compliance with London Plan policy SI2 (Minimising greenhouse gas emissions) and Local Plan Policy LP55 (Mitigating Climate Change) as the accuracy of the carbon saving, energy performance & carbon offset penalty greatly depends on the level of coordination between the architect and the energy consultant.
- 6.7.10 It is noted that it is a requirement of all information presented in planning submissions that it be consistent and coherent, not just to LPA specialists but to any interested parties. Unfortunately, the current submission does not provide consistent building by building analysis and relies on site wide summaries bolstered by, for example, plot based carbon savings calculations. Without an accompanying analysis document, the submission requires stakeholders to have capacity in preparing alternative energy modelling required to calculate the carbon savings. This is considered unacceptable
- 6.7.11 The following analysis is broken down into the relevant topics, below and for the sake of brevity refers to plots rather than the building names:
- Plot A – The Verso Building
 - Plot B – St James's House
 - Plot C – St James's Place
 - Plot D – Mason Building
 - Plot E – Holywell Court
 - Plot F – 87-89 Worship Street
 - Plot G – Carman House
 - Plot H – Webb Terrace and 91-105 Worship Street
 - Plot J – Webb Mews
 - Plot K – 24-26 Holywell Row
 - Plot L – Holywell Mansions and Morris Mews

Scope of Design (LP55 and SI2)

- 6.7.12 The level of detail and the quality of information provided by the submission documents does not allow comparison with best practice and previous developments. The submission relies on the provision of raw data without explanatory text.
- 6.7.13 Nevertheless, the Sustainability officers confirm that minimum compliance with LP55 & SI2 is not met for the non-residential buildings (Plots A, B, C, D, E & G).
- 6.7.14 The submission proposes 3 different design approaches (refer to Table 7 - Energy Statement Revision 06):
- New build: Non-residential plot A and residential plots J & L.
 - Retention and infill: Non-residential plots B, D, E & G and residential plots F & K
 - Retrofit: Non-residential plot C and residential plot H
- 6.7.15 The distinction between new build and refurbishment is particularly important in terms of energy modelling, with the notional baseline being established through formulas with fixed criteria (detailed in the GLA Energy Assessment Guidance Appendix 3). The formulas used guarantee that refurbishment assessments typically show higher carbon savings than new build.

- 6.7.16 GLA and LBH officers note that the submission does not provide details of the level of refurbishment, its scope, its modelling and the constraints in place to achieving better fabric performance
- 6.7.17 As such, the absence of detailed retrofit plans for both the Retention and Infill and Retrofit Scenarios to establish the two notional baselines required to distinguish new build extensions from refurbished areas carbon savings make it impossible to fully assess compliance for Plots B, D, E, G, F & K. The carbon, shortfalls and offset contributions for these plots are liable to have been underestimated based on an incomplete use of the methodology.
- 6.7.18 It is considered unreasonable to recommend conditions that relate to the current submission documents and require further details to show compliance with them at a later stage, since it is not possible to assess whether the development would have the potential to meet the requirements of such conditions. This would be the case even should the conditions only be designed to require compliance with policy, rather than best (or good) practice.

Inadequate detail: proposed carbon savings for Plots A, B, D, E & G

- 6.7.19 All the proposed residential buildings (F, H, J, K & L) exceed the minimum 35% carbon savings threshold (>70%) but none of the non-residential buildings do (<17%). In a commercial led scheme, this requires detailed analysis.
- 6.7.20 The GLA have revised their policy SI2 requirement to calculate carbon savings against Part L 2021 instead of Part L 2013 and there is currently no plan to formally revise the policy threshold for non-residential development, nor to publish a supporting evidence base or additional guidance on the matter, until the new London Plan is released.
- 6.7.21 Given this transitional arrangement in respect of the minimum compliance threshold for non-residential buildings, it is only possible to take a case by case approach, comparing the information submitted at the planning stage against the design approach, energy strategy & carbon savings observed on similar applications.
- 6.7.22 For reference, recent large scale non-residential developments which gained approval through committee have achieved the following carbon savings:
- | | |
|--------------------------------------|---------------|
| • 2023/0362 - Christopher Street | Overall 13.7% |
| • 2023/1360 - Vince Street | Overall 39% |
| • 2023/2925 - Shoreditch High Street | Overall 13.4% |
| • 2024/0724 - Singer Street | Overall 17% |
- 6.7.23 The proposed carbon savings figures for Plots A, B, D, E & G new build elements seem to broadly align with this level of performance. However, the absence of detailed justification on each building, or consideration of opportunities to further maximise carbon savings, has prevented analysis of whether the proposals could be improved. Aside from the requirement for a 35% reduction policy SI2 requires that carbon emissions and energy demand are ‘minimised’ and that renewables are ‘maximised’ in major developments. LP55 uses similar language, as well as stating that “G. Where it can be robustly demonstrated that it is not possible to reduce CO2 emissions on-site by the specified levels”, a carbon offset payment may be allowed.

- 6.7.24 It is this level of detail that is missing. Unlike the approved developments, the same level of scrutiny is not possible. For example, GLA and LBH officers note that the carbon savings achieved through Be Lean are on average 8.5%, much below the minimum 15% threshold despite opportunities to further optimise the energy efficiency through refinement of the fabric performance. Plot A, for instance, shows external wall u-values ranging from 0.09 to 2.17 W/m²K but is not accompanied by detailed scope drawings showing the extent of the wall types and how such large differences in thermal conductivity have been successfully managed. Similarly, for Plot H, proposed u-values for windows, doors and walls and air permeability targets, along with acoustic constraints do not seem to be consistent with the proposed works detailed in the Heritage statement. In the absence of a comprehensive retrofit plan, it is not possible to confirm whether the proposed noise mitigation and thermal performance measures are realistic.
- 6.7.25 Both GLA and LBH officers note that the site wide electricity generation capacity has not been estimated and it appears from the submitted drawings that there are further opportunities to increase the provision of solar PV to plots C, D, G, J & L and by doing so, bolster the carbon savings respectively achieved through Be Green. As no adequate justification has been provided, it is therefore difficult to consider that renewables are not 'maximised'. Would there have been certainty on the overall carbon savings for each building, this concern would normally have been dealt with by condition.
- 6.7.26 However, since the submission for the non-residential parts of the development does not meet the minimum 35% compliance threshold and there seem to be a number of opportunities to further optimise carbon savings, it is considered that any calculation of a Carbon Offset payment would not be accurate. There is not the level of detail available to suggest that it would represent the required payment to provide a Net Zero development.

Accuracy of Submitted Information

- 6.7.27 Sustainability officers have raised serious concerns about the accuracy of the submission's proposed carbon savings for Plots C, D, E, F, H, J & L.
- 6.7.28 The submitted figures suggest that a number of the proposed buildings all achieve exactly the same carbon savings despite being very different buildings.
- 6.7.29 The energy modelling used to calculate carbon savings is building specific and experience suggests it is very unlikely that buildings that vary in terms of their design, footprint and scope of retention would show identical energy modelling:
- Plot C is labelled as "retrofit", which means that the notional baseline should be informed by the GLA Appendix 3 rather than Part L2 (used for new build) and the energy modelling should therefore lead to different carbon savings to the new build Plot G, D & E (Be Lean 7%, Be Green 5%). However all four plots show the same figures.
 - Plot H is a listed building and is labelled as "retrofit" and Plot F has been labelled "infill & transform". The two buildings are distinct in their construction, architecture

and level of retention, with very different opportunities to improve fabric performance and energy systems. Those differences would typically be reflected in a building specific retrofit plan and different carbon savings, but they are shown as the same for both buildings (Be Lean 24% Be Green 0%)

- Similarly, Plots J & L are two different new buildings but show the same carbon savings (Be Lean 19%, Be Green, 41% - Overall 70%)
- Discussions between the Sustainability Officers and Heritage Officers have also confirmed that the thermal performance for the Listed Buildings in the submitted energy statement does not align with the measures that are proposed in the Heritage Statement. The differences are obvious enough that it is difficult to imagine how the conclusions of the Energy Statement were reached if the Heritage Statement had been considered.
- The carbon savings for the non-residential areas (retail) for Plots F, H & L have not been provided

6.7.30 It is this combination of a lack of detail, which prevents robust analysis, and the questionable nature of what information has been provided, that prevents any surety that the proposed development achieves policy objectives in respect of Net Zero Carbon or could be effectively conditioned to meet even minimum compliance standards.

Overheating

6.7.31 The level of detail and the quality of information provided by the submission for the residential buildings is satisfactory to demonstrate that minimum compliance is achieved with Hackney Local Plan policy LP54 (Overheating and adapting to climate change) and London Plan policy SI4 (Managing heat risk) appears to be met for the residential buildings at Plots F, H, J, K & L. These elements would need to be subject to condition.

6.7.32 At the non-residential buildings at Plots A, B & G the overheating risk assessment TM52 results suggest that overheating may be avoided. However, Sustainability officers are concerned that the cooling hierarchy has not been followed, and the active cooling demand has not been reduced as far as practicable. Had this recommendation been for approval, it would have been recommended to secure the submission of a detailed overheating risk assessment for Plots A, B, F, G, H, J, K & L by condition, to verify the cooling hierarchy has been successfully implemented.

6.7.33 At the non-residential buildings at Plots C, D & E, the submission cites “low solar exposure” and have not tested the buildings. Since this doesn’t represent an acceptable exemption from demonstrating compliance with the policy requirement, and Plot D (the Mason Building) looks southward onto the central space, this is considered an unacceptable oversight. The size of the overall development does not provide a reason to ignore buildings that would represent sizeable schemes themselves if submitted on their own.

Decentralised Energy Networks

- 6.7.34 Compliance with the minimum targets for policies LP56 and SI3 is met for all the buildings on site. The Shoreditch District Heat Network is identified as a potential future heat source, and both GLA & LBH officers agree that there is a reasonable strategy in place for future connection to be enabled when it becomes available. Had this recommendation been for approval, a condition would have been recommended to provide details of a connection strategy to ensure each building is connection ready.

Certifications

- 6.7.35 The proposed certifications are considered to have merit. These certifications, such as NABERS 5.5* and BREEAM Outstanding for the office element exceed the minimum compliance policy requirement. The Sustainability Team note that the impact of those beyond policy commitments would be limited by only applying to the office floorspace. The retail element only seeks minimum compliance (BREEAM Excellent), and the residential floorspace does not seek any third party certification, such as Passivhaus or AECB.

Whole Lifecycle Carbon and the Circular Economy

- 6.7.36 The submission states that the scheme would provide 48.3% retention of the structure of the existing buildings. At first glance this might be considered to provide evidence that the scheme should be considered acceptable in this regard. However, a more detailed inspection of the proposals provides a number of reasons to consider the proposals lacking.
- 6.7.37 Firstly, the submitted demolition plans show that floorplates are being retained where supporting main thermal elements such as walls and roofs are being removed. While it is not impossible to do so, the temporary propping required to support such an endeavour comes with a carbon cost of its own, although this does not seem to be explored in the submission.
- 6.7.38 Moreover, the submission's methodology serves to bolster the 48.3% figure in a manner that may not be explicit to all stakeholders. The submission uses GIA to measure the structure to be retained. While this is not objected to, it has to be noted that GIA does not include the external walls or roof of a building. As such, full demolition of all the external walls and the roof of the building would not be recorded and it would appear on this methodology that 100% of the structure was being retained. It is easy to see why this might not provide a clear demonstration of the impact of the development.
- 6.7.39 A more informative assessment would provide a 3D comparison taking into account volumes of demolition and retention, not just the floor areas for each building. The submission does not provide these despite multiple requests.
- 6.7.40 There is also a crucial consideration here when it comes to understanding the correct methodology for measuring carbon savings. For a building to be considered a retrofit and to benefit from less stringent energy modelling criteria, it is typically accepted that at least 50% of the existing thermal elements (such as walls) and services must be retained. Since the application relies on an analysis of GIA, it does not consider at all the retention of these elements and:

- It is not possible to determine which buildings actually qualify as retrofit, and therefore;
- It is not possible to model the carbon savings of the buildings in a robust manner.

6.7.41 Sustainability officers also note that the 48.3% figure includes all the existing buildings on the site, including positive contributors, locally listed and Grade II* listed buildings. There is no realistic scenario in which the listed buildings could be demolished, so including them in a figure that is designed to show the level of retained fabric within the new development artificially inflates that figure.

6.7.42 Buildings that have no individual heritage designation make up 57.3% of the total site (by GIA floor area). Of these buildings 67.7% of the fabric is proposed to be demolished. That is to say that the retention of fabric, even without considering all the issues raised above, is 32.3% for these buildings. Officers consider that this does not meet the policy objective within London Plan SI7 to:

“1) promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible”.

Nevertheless, the current policy structure does not provide a set of minimum standards in this regard, even for referrable schemes.

6.7.43 As such, while there is assessed to be little public benefit in the approach taken by the proposals in this regard, it is not considered unacceptable. Had this recommendation been for approval, an updated circular economy strategy and whole life cycle assessment for each plot would have been required by condition, to understand how each building had maximised their embodied carbon savings and reduced wastage as far as practicable.

Reasonableness of Conditions

6.7.44 For the reasons stated in the preceding sections, it is considered that it would be unreasonable to recommend typical conditions that would require details to show compliance with the targets submitted with the application. The submission documents are at a level of detail to be expected of an outline permission. They are not adequate to show that the proposals are deliverable in a sustainable manner. This is considered to be the case even if the conditions were only designed to require compliance with policy, rather than best (or good) practice.

6.7.45 Had this application not been for full planning permission but had been submitted as an outline application, a Reserved Matters Application (RMA) would have followed to provide the expected level of detail. The same principle could be applied here but by a set of conditions that required the expected level of detail to be provided per phase.

6.7.46 There is an inherent risk to such an approach, since conditions such as these, that required minimum policy compliance per phase might necessitate changes to important aspects of the scheme, such as footprint, form factor, glazing ratio and materiality. Since these elements are left more, or less, undefined within an outline permission, there is less that needs to change when an RMA is submitted. However, this risk would fall on the applicants, rather than the LPA, since any required amendments would remain under LPA control.

- 6.7.47 Since it is possible to condition the submission of detailed documents demonstrating minimum policy compliance per phase and the alternative is to refuse this aspect of the scheme, it is recommended that this approach be considered acceptable. As such, in many respects the submitted design must be considered indicative, rather than finalised, since it is not the suggestion of the submission documents that the proposals will not have to change following a more thorough examination of sustainability.
- 6.7.48 The site is relatively unusual in the Borough in respect of its size and complexity. In most cases, it would also be typical that elements of risk such as this would be minimised through the application process, rather than at the post-planning stage. As such it is considered that the potential for the proposed approach to create an unfortunate precedent is considered to be low.
- 6.7.49 The scheme has a proposed Carbon Offset payment and this would have formed part of the Heads of Terms of any Legal Agreement. Since it is not possible to ascertain how far short of Net Zero this building would actually be until the above conditions were complied with, a further condition would have been necessary to require a recalculation of the Carbon Offset, at the point of submission for each phase.

Energy and Sustainability Conclusions

- 6.7.50 The level of detail provided within the submission is akin to what might have been expected of an outline permission. An outline permission could have been applied for but it has not been, and officers' assessment must be undertaken accordingly. The requirement of case law is that information presented in planning submissions be consistent and coherent, and sustainability officers have drawn attention to the lack of supporting analysis at a meaningful scale, as well as the questionable nature of data that has been provided.
- 6.7.51 Moreover, local and regional policy does not wholly rely on specific targets, in certain respects it requires that opportunities be maximised and unsustainable demands be minimised.
- 6.7.52 The issue for the application is that, using the submitted documents, it is not feasible to condition a base level of compliance with a policy that requires applicants to maximise and minimise in this way. Assessment of the quality of the application in this regard requires a level of site and building specific analysis that has not been submitted. At application stage submission documents are expected to demonstrate their compliance against targets, provide adequate justification where targets are not met, and evidence any shortfall from Net Zero that must be made up by a Carbon Offset payment. It is this information that would then be conditioned.
- 6.7.53 Since this more typical approach is not available, had this recommendation been for approval, it would have been necessary to draft conditions requiring a full suite of documents showing that the scheme meets the minimum policy requirements in respect of environmental sustainability. These post-planning submissions would be scrutinised just as they would have been if they had formed part of this application. As such, the risk remains that the scheme would need to be significantly redesigned once the full implications of the policy requirements were more thoroughly analysed..

- 6.7.54 While this approach ensures that a reason for refusal can be avoided at this stage, it does require that the design of the proposal should be considered indicative. Environmental sustainability is a key driver of design choices and the design is therefore liable to change.
- 6.7.55 Moreover, since it would be unreasonable to condition more than policy compliance, the public benefit of the scheme in terms of its sustainability must be considered to be low. Where policies do not address all the impacts of the buildings, such as their embodied carbon and unregulated energy demands, the chosen approach means that there are no counterbalancing best, or good, practice elements that could reasonably be conditioned.

Water Network, Drainage and Flood Risk

- 6.7.56 The site has a "medium to high" risk of surface water flooding, is located in a critical drainage area and has an increased potential for elevated groundwater.
- 6.7.57 The Council's Drainage team have reviewed the proposal and state no objection. The proposed drainage strategy incorporates a range of SuDS measures, including green/blue roof attenuation systems (Plots A, B, D, E and G), rainwater harvesting, bioretention systems (rain gardens), permeable block paving with tanked permavoid sub-base replacement crates, and geo-cellular attenuation crates. Surface water runoff will be restricted to a peak discharge of 8.0 l/s for all return periods up to and including the 1-in-100-year plus 40% climate change event.
- 6.7.58 The Drainage team recommend conditions to ensure the appropriateness of the development in this regard, the first of which requires the submission and approval of the detailed specification of the sustainable drainage system supported by appropriate calculations, an infiltration test, construction details, drainage layout, a site-specific management and maintenance plan and post-construction surveys.
- 6.7.59 The Greater London Authority (GLA) has requested confirmation that finished floor levels (FFLs) are set above the modelled 1-in-100-year surface water flood level, based on the latest Risk of Surface Water Flooding (RoFSW) mapping. The GLA has also requested that the submission demonstrate how the proposed development will avoid displacing surface water flood risk off-site. These matters remain outstanding and would need to be dealt with by condition.
- 6.7.60 Hackney Local Plan policy LP53 item E requires that "development which includes the creation or extension of basements must demonstrate that they will not increase the potential for groundwater flooding to itself or to the surrounding area." The proposed development includes a combination of single and double-level basements. A further condition is recommended in this regard, to provide below-ground construction details for each phase of basement development, with a scheme for the management of groundwater flood risk.
- 6.7.61 Thames Water have also reviewed the proposal and have requested a number of conditions in respect of the potential for water network upgrades and details of the proposed piling in advance of the commencement of development.

- 6.7.62 Subject to the above conditions, the proposal is deemed to be in line with the requirements of local and regional policy.

6.8 Trees and Biodiversity

- 6.8.1 Policy G7 (Biodiversity and access to nature) and G7 (Trees and Woodland), along with Local Plan 2033 policies LP47 (Biodiversity and Sites of Importance of Nature Conservation) and LP51 (Tree Management and Landscaping) stress the importance of trees and biodiversity.
- 6.8.2 As outlined within the submitted preliminary ecological assessment (PEA), the site has generally low ecological value, with limited ornamental vegetation and no suitable features for roosting bats. There may be some suitable habitat for red foxes and the site could support nesting birds on building roofs and within vegetation. In the surrounding areas, there are 6 areas of broadleaved woodland within 1km of the site. The development therefore presents opportunities for biodiversity enhancement, including wildlife-friendly planting, native tree planting, and green roofs.
- 6.8.3 Protective measures recommended (outlined within the PEA) which are recommended by the biodiversity officer to be included as a planning condition, since they fall outside of the remit of separate legislation, include:
- To protect nesting birds, vegetation clearance should occur outside the March–September nesting season.
 - Construction should follow a precautionary working method statement (PWMS), including measures to prevent harm to wild mammals, such as covering deep holes and providing escape routes.
 - Hoarding should also prevent wildlife from entering the site.

An informative should also be added to remind the developers of the Wildlife and Countryside Act 1981, which mandates that developments must avoid harming protected species and habitats.

Biodiversity Net Gain (BNG)

- 6.8.4 Biodiversity Net Gain (BNG) applies to this application. The baseline value consists of 0.08 habitat units, and the proposed post-development value is 1.18 habitat units. Therefore, the proposed net change in habitat units is 1.10 habitat units, which is a proposed net increase of 1375%. This represents a large percentage uplift because the baseline value is so low, despite that the benefit is modest in absolute terms. The baseline value consists of ground level planters across the site.
- 6.8.5 The development falls within the cost band of large major development (10,000+ sqm of floor space) and medium habitat technical difficulty. The BNG monitoring fee is £17,309.61.
- ### *Urban Greening Factor*
- 6.8.6 Urban Greening Factor (UGF) is required for all major developments under policy LP48 of Hackney's Local Plan and the London Plan. The submission includes an Urban Greening Factor (UGF) calculation table and a colour-coded map, which together demonstrate compliance with UGF requirements. The proposed UGF score is 0.32. The target UGF score for this site is 0.3.

- 6.8.7 The planting that makes up the UGF score includes biodiverse roofs, trees in connected tree pits, flower-rich perennial planting, rain gardens and other vegetated SuDS elements, green walls. 5000m² of permeable paving is also to be laid. These elements would be controlled by the landscaping conditions of any approval.

External Lighting

- 6.8.8 NPPF policy 198 states that development should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 6.8.9 To ensure that light pollution caused by artificial light at night would not be harmful to biodiversity and urban trees a condition would have been recommended to avoid lighting directed at trees or planted areas, and to create dark zones both in ground floor vegetation, trees and in green roof areas. Measures to require warm (rather than white or blue) lighting and motion sensors or timers on lights, would have formed part of the condition wording.

Planting Plan

- 6.8.10 While the planting plans have not been developed to a full level of detail, generally they would be supported, subject to an increase in the structural diversity of the planting.
- 6.8.11 As such, had the proposal been acceptable, this element would be subject to a condition requiring a detailed submission at a later stage. This would require planting of different shapes and sizes, to include more species that flower at varying times of the year and provide a continuous resource availability for wildlife.

Green Roofs

- 6.8.12 The Biodiversity Officer notes that a significant portion of the green roofs appears to be accessible, which could lead to increased disturbance to wildlife across all roof areas. Wildflower meadow planting is proposed for the inaccessible roof sections to enhance biodiversity. In total, 3,000 sqm of green roof planting is planned.
- 6.8.13 Had this recommendation been for approval, it would have been necessary to condition the design and maintenance of the proposed green roofs.

Bird and Bat boxes

- 6.8.14 The BNG report recommends providing a variety of general-purpose, multi-species nesting boxes, but the proposals are lower than would be expected in terms of quantum for a scheme of this size, and the details could be improved.
- 6.8.15 Had this recommendation been for approval, it would have been necessary to condition further details to be provided in respect of the location, design and number of bird and bat habitats across the scheme, to ensure the acceptability of this element.

Trees

- 6.8.16 There are currently no trees within the redline boundary of the site. There are five street trees which are adjacent to the site and require pruning to facilitate the proposal. No existing street trees require removal to facilitate construction. One tree surveyed was classified as 'U' in the BS5837(2012) Trees in relation to design, demolition and construction cascade chart. The Hackney Streetscene Tree Officer

responsible for the council trees in the area has confirmed that it is dead and will be removed regardless of whether development goes ahead. Three more trees are adjacent to the site but require no tree work to facilitate pruning. Tree Officers have reviewed the Arboricultural Implications Assessment and Method Statement produced by CBA trees included in the application and confirmed that the facilitation work to the street trees and the tree protection measures are acceptable, subject to conditions in this regard.

- 6.8.17 A total of 152 new trees are proposed within the planning boundary, with 47 at ground level and 105 on roof terraces.
- 6.8.18 As there are going to be 105 trees at roof level, it is likely that these will be smaller, shrub-type species contained within planters and pots. In line with the UGF calculations, the roof top trees are those categorised as “standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree”, and the trees planted at ground level have been categorised as “standard trees planted in connected pits with a minimum of soil volume equivalent to at least two thirds of projected canopy area of the mature tree”.
- 6.8.19 The site is challenging because of the shade that the building massing creates. The submission considers this and have proposed appropriate shade tolerant tree species where necessary on the ground floor. The trees on the roof gardens and terraces will allow for species to be selected that prefer full sun. Tree pit and guying specifications will need to be provided to ensure the viability of the trees on the roof gardens and terraces. As such, further details on planting and maintenance of all the proposed trees would be required within a more detailed tree planting plan by condition, to demonstrate how the tree planting scheme is going to be achieved and maintained successfully.
- 6.8.20 Tree planting may be possible within the public realm outside of the red line. There is expected to be a high level of existing subsurface infrastructure and this would need to be investigated at the next stage before firming up plans in this regard. Nevertheless, one of the Streetscene team's priorities is to green the Borough, and the intention with the s278 Public Realm proposal would be to create rain gardens and plant trees wherever practicable, once the necessary investigations have determined where such planting would be viable.

Biodiversity Conclusions

- 6.8.21 For these reasons, subject to the provision of further details at the post-application stage, the proposal would be considered acceptable with regard to its impact on biodiversity and trees.

6.9 Scheme Viability

- 6.9.1 As the submission does not provide a policy compliant level of Affordable Housing or Affordable Workspace, it includes a Financial Viability Assessment (FVA), which was updated when the scheme was revised. This has led to the applicants making an ‘offer’ of Affordable Housing and Affordable Workspace that their submitted FVA suggests is not viable.
- 6.9.2 We note that the majority of local and regional planning policy is not ‘subject to

viability'. The impacts of development are instead measured against the requirements of policy. Indeed, it is accepted from case law that planning policy requirements must feed into site valuation. For this scheme, viability is relevant to the provision of Affordable Workspace and Affordable Housing. In other respects it is not referred to in planning policy as a matter to be weighed against policy objectives. For example, London Plan policy D3 (Optimising site capacity through the design-led approach) addresses the optimisation of sites, building to the highest density appropriate to the site constraints. Local Plan policy LP1 (Design Quality and Local Character) focuses on high quality design that responds to the constraints of local character. In neither policy is there a suggestion that site constraints could be ignored because of a scheme's 'viability'. It is also noted that the FVA does not attempt to explore the viability of any alternative schemes of lesser harm on the surrounding townscape and heritage assets.

- 6.9.3 The applicants have made an offer of 35% Affordable Housing and 6.6% Affordable Workspace. These elements have been considered in the report above. The submitted FVA suggests that this offer is beyond the viability of the scheme to deliver. However, on review of the submitted FVA, the Council, supported by external consultants JLL, consider that the FVA underestimates the value of the scheme. On an 'applicant blind' basis, after allowing for the required profit margin of 15% on GDV (rounded) reflecting £107,061,140, as well as the required benchmark land value for the scheme to be viable (£133,794,000), JLL's appraisal shows a small surplus. Therefore, JLL concluded that the scheme was viable.
- 6.9.4 Since the applicants have sought a decision on the application now, it has not been possible to come to a final agreement on these matters. However, this is considered to be of little importance to the decision to be made. The impacts of the development on the townscape, conservation area and heritage assets must be assessed on their own merits and do not hinge on the viability of the scheme. The level of public benefit from the proposed Affordable Housing and Affordable Workspace can also be considered.
- 6.9.5 In addition, the submitted FVA is limited in its scope. It was noted by officers, even prior to the validation of the application, that it is very unusual for an FVA for a scheme of this size to be submitted without a build cost analysis by a Quantity Surveyor. Nor does the FVA consider whether a more policy compliant scheme of amended design might also be viable. The limitations of the undertaken viability exercise, alongside the specific reasons for refusal, suggest that it is reasonable to come to a final decision without final agreement on the extent of the surplus generated by the proposed scheme.

6.10 Health and Wellbeing

- 6.10.1 London Plan policy GG3 (Creating a healthy city) and Local Plan 2033 policy LP9 (Health and Wellbeing) state development should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.
- 6.10.2 The submission includes a Health Impact Assessment (HIA) which seeks to assess the potential impacts of development on the social, psychological and physical health of individuals and communities. The following sections are an evaluation of the

development's impact on specific health themes covered within the HIA, as advocated by the above policies.

Housing Quality, Affordability and Design

- 6.10.3 Access to adequate housing is critically important for health and wellbeing. This development will meet the required accessibility standards. The units are in line with London and Local Plan policies in relation to floorspace quantum, design, and layout. Dual aspect units have been maximised in the new build elements.
- 6.10.4 Affordable housing provision does not meet the 50% policy target but has been viability tested. The number of residential units, an increase of 40 units, is lower than expected by the site allocation and emerging site allocation and is low compared to the size of the site. The housing mix shows more studio and one bed units than policy targets. Overall the health and wellbeing of the development is considered neutral in terms of housing, housing quality and design.

Access to Healthcare and other Social Infrastructure

- 6.10.5 Strong, vibrant and inclusive communities require good quality infrastructure. Opportunities for the community to participate in the planning of the place where they live can contribute positively to mental health and wellbeing.
- 6.10.6 The National Health Service has confirmed that it is satisfied that there are not sufficient residential units proposed that a payment would be required in this regard. The proposal does not include the provision of any healthcare services or contribute to meeting educational needs, but the applicants have reached out to a number of community groups, including New City College. Whether these end up tenanting the finished scheme will be a matter for the applicants to decide, there is no dedicated space for educational purposes.
- 6.10.7 Had this recommendation been for approval, as above, the Urban Room would have been required by legal agreement to provide a mix of uses that included community organisations. As such, the overall provision can be considered to be neutral.

Access to Open Space and Nature

- 6.10.8 Providing convenient and attractive open/green space can lead to more physical activity and reduce levels of heart disease, strokes, obesity, cancers and mental health conditions.
- 6.10.9 The proposal provides an undersupply of outdoor amenity space when compared to policy targets against the number of employees and residents that would be on-site. However it would provide a central space, where currently there is none, along with some playspace in a courtyard. Biodiversity officers do not object to the level of planting proposed on-site, which could be further improved in its design and biodiversity benefits by condition. While subsurface infrastructure is likely to make the planting of additional street trees difficult, the hope is that some can be provided in build outs within s278 public realm works, and the work to establish the potential for this would need to be undertaken post permission by the Council since it is not part of the submission.

- 6.10.10 On balance, this can be considered a neutral impact, subject to acceptable mitigation to be required via legal agreement for the number of on-site employees and residents that would not have access to sufficient open space, since the benefits and the impacts of the development in this regard would thereby somewhat balance out.

Air Quality, Noise and Neighbourhood Amenity

- 6.10.11 The development will be 'car-free', save for blue badge spaces, minimising transport-related emissions. Heat and hot water will be provided by ASHPs and the 'air quality positive' approach has been followed. Conditions would have been recommended in this regard. Diesel emergency generators are proposed and, following extensive negotiations with the Borough's Air Quality team, it is considered that this element could have been satisfactorily controlled by condition.
- 6.10.12 The development will not add significantly to external noise levels caused by traffic or commercial uses. Conditions restricting the hours of commercial operation would have been recommended. A children's play area is incorporated into the design is not so large as is liable to cause significant disruption. As in the amenity section above, the amenity impacts to residents are found to be acceptable.

Accessibility and Active Travel

- 6.10.13 Transport has a positive role for health in London; it is the main way that people stay active. As well as 'active travel' (i.e. walking or cycling trips), this also includes the incidental physical activity connected to use of public transport. Given the health benefits of physical activity, and levels of physical inactivity locally, interventions to increase uptake of walking and cycling are strongly encouraged for public health (as well as other transport) objectives.
- 6.10.14 The development would open up the central part of the site and while any comprehensive development of the site would provide this benefit, it still remains a benefit. The new buildings would be accessible for all users and the majority of the trips to the site would be by sustainable and active modes. The scheme would provide an underprovision of cycle parking against Hackney standards and the quality of the cycle parking has been questioned by Highways officers but it is considered that this could be improved by condition.
- 6.10.15 As such, the overall impact of the development is considered positive in terms of accessibility and Active Travel.

Social Cohesion and Inclusive Design

- 6.10.16 Fragmentation of social structures can lead to communities demarcated by socio-economic status, age and/or ethnicity, which can lead to isolation, insecurity and a lack of cohesion.
- 6.10.17 The development provides housing in a range of tenures and sizes and while these do not meet policy targets, or achieve the quantum expected by the existing and emerging site allocations, they do not form reasons for refusal in the assessment above.

- 6.10.18 The open spaces are compromised by the volume of development, involving undercrofts and more wind than would be desirable, but they are new spaces and are positive in that respect. The development aims to integrate into the wider movement network (facilitating cohesion with the wider community) and seeks to remove existing severance (to promote accessibility). The roof spaces of the development provide multi-level amenity spaces for future employees and residents. The Urban Room has the potential to be a successful companion to the outdoor public realm.
- 6.10.19 A range of employment floorspace is provided by the development, notwithstanding the issues around the underprovision of Affordable Workspace.
- 6.10.20 On balance, when considering the development against the existing buildings onsite, rather than the opportunity cost of alternative schemes, the impact of the development would be broadly positive in respect of social cohesion and inclusive design.

Access to Work and Training

- 6.10.21 Employment contributes to mental and physical health through the opportunity to be active and have a sense of purpose and control, as well as reducing deprivation. Work also supports recovery from physical and mental illness.
- 6.10.22 The construction of the development will create significant construction jobs in the local area, which could benefit the population across the city, including through local apprenticeships during the construction phase of development. The development's end use is also proposed to be a majority of commercial uses, with a significant proportion of this for office use, which will create permanent end-use jobs.
- 6.10.23 The quantum of Affordable Workspace does not meet policy targets, which is very unusual for a POA scheme of this scale. However, by prioritising commercial floorspace over the residential floorspace expected in the existing and emerging site allocations, and by the high volume of development, the result is a greater level of employment floorspace than expected.
- 6.10.24 The applicant and contractor plan to sign up to the Council's construction training programmes and to supplement these with access to their own preferred partner, which would provide opportunities for local apprentices. They also intend to commit to an agreed Local Labour Plan and monitor the amount of local labour recruited, engaged, and hired. These aspects would have formed Heads of Terms within a legal agreement.
- 6.10.25 As such the scheme would provide a positive contribution to local access to work and training.

Access to Healthy Food

- 6.10.26 Access to healthy food can improve diet, and contribute to preventing chronic diseases and obesity. The proposal does not provide opportunities for growing food locally through e.g. allotments or community food growing spaces for existing residents but this is understood given the volume of the development and the central

city location. Retail units are proposed on site which, by virtue of the lack of roof level exhaust ventilation, would not be operated as hot-food takeaways. The development is deemed to have a neutral impact in terms of access to healthy food.

Climate Change

- 6.10.27 The Climate Change impacts of the proposal are assessed above and the conclusion of the assessment is that the details are insufficient to allow a positive recommendation. Given Hackney Council's declaration of climate emergency and commitment to Net Zero, the Climate Change impacts must be considered negative.

Minimising the Use of Resources

- 6.10.28 Reducing waste, including disposal, construction processes and encouraging recycling can improve human health by minimising environmental impacts. The assessment above in respect of the Circular Economy and Whole Lifecycle Carbon notes that the claims of the submission in terms of the retained structure on site are likely to be overstated. Nevertheless, heritage buildings are not proposed for demolition and densification of an underutilised central London site is welcomed in principle.
- 6.10.29 In the event of an approval a demolition and construction waste management plan would be required, setting out how resources will be managed and waste controlled at all stages during the construction project. The proposal promotes the use of sustainable transport. Overall, the proposal is deemed to have a positive impact in terms of minimising the use of resources, aside from the issue of energy use, which is more properly considered under the 'Climate Change' section directly above.

Crime Reduction and Community Safety

- 6.10.30 Planning and urban design that promotes natural surveillance and social interaction can help reduce crime and fear of crime, both of which impact adversely on the mental wellbeing of residents. This application has been reviewed by Design Out Crime officers who have provided a number of recommendations for improving community safety that have been incorporated into the design. The public realm will benefit from passive surveillance through overlooking from the properties and will be well lit at night. The development relies on undercroft routes into the site but CCTV could have been recommended by condition to cover the undercrofts, entrance areas, bin and bike stores, and (wherever there is not fob access) lift areas and lobbies. The lighting design would also have been controlled by condition to ensure that the routes and central spaces discouraged anti-social behaviour. The development is deemed to have a positive impact in terms of crime reduction and community safety.

Summary

- 6.10.31 Overall, the development is considered to have a neutral impact on public health in Hackney, when measured against the requirements of London Plan policy GG3 and LP33 policy LP9. Positive aspects such as the opening up of the site are counter balanced by the impacts of the high volume of development. It would have been considered acceptable in respect of these two policies, subject to a number of conditions to help mitigate the negative impacts and ensure the positive.

6.11 Environmental Impact Assessment

- 6.11.01 The Environmental Impact Assessment Regulations 2017 (“the EIA Regulations”) set out in Schedule 4 the general requirements for the content of Environmental Statements. These comprise information on the nature of the development; consideration of alternatives; relevant aspects of the environment; likely environmental impacts arising; proposed mitigation measures; and an indication of any difficulties in compiling the information needed. A non-technical summary of the contents of the Environmental Statement is also required.
- 6.11.02 Regulation 18(5) of the EIA Regulations requires an applicant to ensure that the ES is prepared by competent experts and provide a statement from the developer outlining the relevant expertise or qualifications of such experts. Tetra Tech RPS (TTRPS) was appointed by LBH to undertake a review of the submitted ES produced by Trium Environmental Consulting LLP on behalf of the applicant. Following this review, TTRPS requested a number of clarifications and revisions. An ES Addendum was produced at the time of the amended application (September 2025), which picked up on these points. TTRPS have confirmed that they consider the 2024 ES and the ES Addendum are compliant with the information requirements of Schedule 4 to the EIA Regulations (‘Information for Inclusion in Environmental Statements’), and that the documents are largely suitable for consideration as ‘environmental information’ for the Project, in accordance with the EIA Regulations.
- 6.11.03 TTRPS have made a further statement that: *“It is of note that the Applicant has included (within the ES Addendum) detailed responses to consultee comments regarding the built heritage and townscape and visual assessment that presents disagreement with some the comments raised by consultees to the application, particularly regarding the significance of heritage impacts, the acceptability of demolition of historic fabric, and the effect of the proposed tall building on the South Shoreditch Conservation Area. While the ES Addendum provides sufficient information for decision-making, LBH should be aware that the applicant’s approach prioritises justification over full accommodation of consultee feedback, resulting in unresolved areas of disagreement.”*
- 6.11.04 Notwithstanding this point, which is in line with the assessment in the other sections of this report, the Environmental Statement and ES addendum are considered to have adequately identified all of the potential environmental effects of the proposed scheme. Where there are issues with the submitted information, the other sections of this report consider them in more detail. Given that the recommendation of this report is for refusal of the application, and the applicant team has confirmed that there is to be no more information submitted at this stage, it is considered that the information provided in the ES can be used as a basis for determination of the application.

6.12 Other Planning Matters

Ground Contamination

- 6.12.1 The site is of potential concern with regard to contaminated land and the submission has been reviewed by Contaminated Land officers. They are satisfied that the proposals are acceptable, subject to three conditions (covering land contamination,

Radon and Unexploded Ordnance) to ensure the safety of the construction period and final development. On this basis, the proposal is considered to be acceptable with regards to land contamination.

Air Pollution

- 6.12.2 A revised Air Quality Positive statement was provided during the course of the application and is now to an acceptable level of detail. Air Pollution officers are broadly satisfied with the breadth of measures that are included and consider that, overall, the 'air quality positive' approach has been followed. Conditions would be necessary in this regard, to ensure that the approach is adhered to.
- 6.12.3 Air Pollution officers have confirmed that they would be reluctant to accept the inclusion of 9no. fully diesel powered generators, given the increasing availability of battery and hybrid backup sources and that the submission documents do not appear to have explored alternative generator technologies. This is especially in the context of what they consider to be a non-optimal flue location. Diesel generators continue to contribute to greenhouse gas emissions and a further condition would have been recommended to explore alternative, less polluting, alternatives at the post-planning stage.

Fire Safety

- 6.12.4 In line with Policy D12 of the London Plan, the submission includes a Fire Statement within the Environmental Statement. All fire service access to the interior of the site must come via the northern entrance route (adjacent to the proposed Mason building), which is the only one which is not a narrow undercroft route. There is one building identified as high risk in the proposals, using the Health and Safety Executive (HSE) Gateway One definition, Holywell Mansions. Following a submission from the applicants on 20 November 2025, HSE have confirmed that they are content with the fire safety design in respect of Holywell Mansions, to the extent that it affects land use planning.
- 6.12.5 Following the resolution of the matters that had previously been objected to by HSE, the Council's Building Control officers have reviewed the proposals for the wider scheme. Following further submissions from the applicant in January 2026, there are no objections from the Borough's Building Control team, subject to a condition requiring that the submitted details be followed. Additional work will be required at later stages, in conjunction with an approved Inspector for Building Regulations and the local Fire Brigade in the usual manner.

6.13 Consideration of Consultee Responses

- 6.13.1 In general, the response to issues raised by consultees has been outlined in the main body of the report, However there were additional matters raised in consultation responses that are dealt with here:

Matters of Support:

- 6.13.2 The collaborative and co-design-led process has engaged local practitioners throughout, creating an authentic sense of place and shared authorship that will resonate with the community it serves.

The applicants have made extensive efforts to reach out to future users of the site, such as through the Meanwhile... in Shoreditch programme.

Officer Response: The LPA welcomes all efforts by applicants to engage with the local community.

- 6.13.3 The allocation of dedicated artist and maker studio spaces within the St James's Place building on Scrutton Street, the gallery/exhibition space on Worship Street and the Urban Room will provide infrastructure for emerging and established artists.

The Urban Room's planned programme of events and networking opportunities, would serve as a conduit between the area's diverse groups of artists, researchers, entrepreneurs and established businesses, facilitating the knowledge exchange and unexpected collisions of ideas that drive innovation.

Officer Response: While the tenants and users of the buildings would not have been defined by the planning permission, aside from controls over the use of the Urban Room, support for the applicants' strategy in consultee responses is noted by officers.

- 6.13.4 Flexible workspace options across the development will allow companies to scale up without the disruption of relocation, maintaining their relationships and community connections.

Officer Response: Flexible Class E floorspace is supported by local policy LP27.

- 6.13.5 The on-site public realm would include bespoke street furniture, designed locally.

Officer Response: Had this recommendation been for approval, hard landscaping would have been detailed more fully at the post-planning stage. The involvement of local artisans would have been welcomed, although not required.

Matters of Objection:

- 6.13.6 Impact of noise and air pollution during extended construction period on neighbouring residences and offices.

Officer Response: Limited weight can be afforded to the consideration of noise and disturbance from construction works given the otherwise acceptable nature of the proposal and temporary nature of the construction impact. In addition, controls

outside of the planning system exist to ensure that disturbance from construction work is minimised. It is not considered that there are any constraints at or surrounding the site which would make the area particularly sensitive to disturbance from construction work and therefore justify further consideration. As such it is not considered that disturbance from construction work would justify the refusal of the application.

- 6.13.7 Servicing should not be undertaken via Holywell Row to access the dedicated new vehicular parking bay for deliveries and waste collection on Scrutton Street. Holywell Row is a narrow, single lane street, with reduced width pavements and a tight turn at the junction of Clifton Street and Holywell Row, which is one way. It is not adequate for servicing by HGVs and large vehicles or for such a large development.

Officer Response: As detailed in the report above, the servicing of the development is large scale and complex. The level of detail provided and the specifics of the arrangements would have needed to have been controlled by condition and legal agreement within the post-planning stage.

- 6.13.8 Residents in the urban block were not informed of the scheme by the applicants prior to this application stage consultation by Hackney.

Officer Response: There is no policy requirement for consultation to be carried out by the applicant. However, paragraph 4.37 of the submitted planning statement details that consultation did occur and the methodologies used, including two in person events on 11 and 12 December 2023 at The Drum Labs, 25-27 Curtain Road.

6.14 Planning contributions and Community Infrastructure Levy (CIL)

- 6.14.1 The Mayor of London has introduced a CIL to assist with the funding of Crossrail. In the case of developments within the Central London band, Mayoral CIL2 is chargeable at a rate of:
- Office = £185 psqm
 - Retail = £165 psqm
 - Residential = £60 psqm
- 6.14.2 Hackney Zone A (residential) and City Fringe (office and retail) CIL bandings are applicable to this development, at rates of:
- Office = £50 psqm
 - Retail = Nil charge
 - Residential = £190 psqm
- 6.14.3 There is existing floorspace on the site that has been in use for six continuous months of the 36 previous months. In discussions with the Hackney CIL team, the Hackney CIL liability has been calculated to be £4,034,134.76 and the Mayoral CIL2 charge is calculated to be £8,564,287.74
- 6.14.4 Other planning obligations and conditions would also have been necessary in the event of an approval, including the heads of terms detailed in the report above that

would have been required for the legal agreement.

6.15 Equalities Considerations

- 6.15.1 The Equality Act 2010 requires public authorities, when discharging their functions, to have due regard to the need to (a) eliminate unlawful discrimination, harassment and victimisation and other conduct; (b) advance equality of opportunity between people who share a protected characteristic and those who do not; and (c) Foster good relations between people who share a protected characteristic and persons who do not share it. The protected characteristics under the Act are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 6.15.2 Having regard to the duty set out in the S149 Equality Act 2010, the development proposals do not raise specific equality issues other than where discussed in this report.

7.0 CONCLUSION

- 7.1 The proposals would develop an opportunity site that is considered of great importance in Shoreditch and Hackney, as recognised in the Site Allocation and emerging Site Allocation. The principle of a commercial-led mixed use is accepted, alongside the general approach to the site layout.
- 7.2 There are many significant public benefits to the scheme, which may be summarised as follows:
- The creation of jobs in both construction and end use phases, including a number of apprenticeships. The LPA estimates that around 4150 employees would be based at the completed site.
 - The provision of 65,448m² of high quality office floorspace, including Affordable Workspace, suitable for a range of businesses.
 - 40 additional homes, including 27 units of Affordable Housing.
 - The provision of a sui generis Urban Room, which could have been required within a legal agreement to provide a range of suitable events as part of its designation as 'Affordable Workspace'.
 - The opening up of new routes through the site and a central courtyard, whereas the interior of the urban block currently has no public access. The majority of these routes would provide 24 hour access, if suitably conditioned.
 - Ground floor level retail and active frontages, including within the central part of the site.
 - Refurbishment of existing listed (Grade II* and Grade II) buildings that are to be retained.
 - A policy compliant level of urban greening (UGF 0.32), including biodiverse planting throughout and trees at ground level and on roof terraces.
 - A car free development, save for off-site blue badge spaces, in line with policy priorities.
 - Public realm improvements outside the red line boundary.

- 7.3 An element of the scheme that is not considered to provide a significant public benefit since, as detailed above (Affordable Workspace paragraphs 6.1.37 to 6.1.39 and Employment and Skills Training paragraphs 6.1.41 to 6.1.44), it could not reasonably be secured, is the choice of partners detailed in the submission and the methodology for working with them. The submission makes the case that commercial tenants would be chosen carefully, to create a 'Regenerative Business Hub' that would operate as a functional commercial ecosystem within the wider ecosystem of Shoreditch. However, planning applications must be considered on an 'applicant blind' basis and little weight can be given to their stated approach. In the event of an approval, it would not have been appropriate to condition this aspect to require it of the applicant. Nor would it have been desirable to do so since, in an era where the longevity of new buildings must be considered, to condition a particular approach would ignore the many economic changes that such buildings would endure through their lifetime. Instead, it may be expected of any large scale commercially-led scheme in Shoreditch, particularly through the provision of floorspace dedicated as Affordable Workspace, that it would provide a flexible range of unit sizes suitable for occupation by a range of businesses, including small or independent commercial enterprises, in line with policies LP27 and LP29.
- 7.4 Set against these public benefits, the impact of the proposed development on the character of the South Shoreditch Conservation Area, neighbouring heritage assets and the wider townscape is significant. This assessment is in line with that of the GLA and multiple heritage bodies, including Historic England. As such, significant public benefits would be required to balance against the harm caused.
- 7.5 When considering the planning balance, it is considered that the proposed volume of development has one uncontested public benefit, that of the quantum of commercial floorspace to be provided and the jobs that would thereby be supported. The LPA estimates that around 4150 employees would be based at the completed site. This is of considerable value within the planning balance, regardless that, in line with policy LP12, the need for 7000 residential units in Shoreditch is assessed above as being the issue of most pressing need, following the approval of a number of large office schemes in Shoreditch.
- 7.6 In other respects, the volume of the development is considered to have undermined the public benefits to be provided. For example:
- A high quantum of commercial floorspace has not been balanced with the number or residential units that might have been expected of a scheme of this scale.
 - The level of Affordable Workspace does not meet policy targets, despite the scale of floorspace overall. This has formed a reason for refusal.
 - All of the high value commercial floorspace would be built in the two earliest phases, reducing the ability of any permission to secure the delivery of the residential units or heritage refurbishment.
 - The proposed residential units, central square and surrounding routes would be significantly overshadowed by the scale of the proposed development. The central yard would be impacted by wind from the tall building and relies on undercrofts for access on the key pedestrian desire lines.
 - The amount of proposed on-site open space represents a shortfall on policy targets that aim to minimise impacts on surrounding open space from new occupants.
- 7.7 It is the conclusion of this report that, with regard to the overall planning balance, the

scheme should be refused.

- 7.8 The level of detail submitted to support the scheme is, for many elements, that which would be expected of an outline scheme, rather than a full application. While this is unusual, with a sufficient number of conditions this could have been worked around. However, it is of note that the submitted design must therefore be considered indicative, rather than finalised, since it is not the suggestion of the submission documents that the proposals will not have to change following a more thorough presentation of its detail. This is most particularly the case for sustainability, where design development and sustainability concerns must be worked through in tandem.

Overall Planning Balance

- 7.9 In carrying out the planning balance in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004 ("the 2004 Act"), the first stage is to consider whether the proposal accords with the Development Plan (as material to the application), taken as a whole. If the scheme is not in accordance with the Development Plan, taken as a whole, the next stage is to consider whether there are material considerations of sufficient weight to rebut the statutory presumption in favour of determination in accordance with the Development Plan.
- 7.10 The NPPF is an important material consideration, but it does not displace the statutory starting point, namely, to determine whether there is compliance or otherwise with the development plan. In any event, for the purposes of the presumption in favour of sustainable development, the applicant agrees (Planning Statement, para 12.3) that paragraph 11 c of the NPPF applies in this case.
- 7.11 As set out above, the proposal does not accord with the up-to-date Development Plan, taken as a whole, and should be refused for the reasons set out in the Recommendation below, unless other material considerations indicate otherwise. For the reasons detailed in this report, which are summarised within this section, it is considered that the benefits of the proposal do not outweigh the identified harm to interests of acknowledged planning importance.
- 7.12 It is the conclusion of this report that, with regard to the overall planning balance, the scheme should be refused

8.0 RECOMMENDATIONS

8.1 Recommendation A

That planning permission be REFUSED for the following reasons, subject to referral to the Greater London Authority:

8.1.1 - Design and Heritage

The proposed development by reason of its design, scale and positioning, would result in an incompatible and obtrusive development which would harm the character and

appearance of the South Shoreditch Conservation Area and the wider townscape, as well as the setting of listed buildings, non-designated heritage assets. The excessive scale and volume of the development would adversely impact the microclimate of the onsite and adjacent public realm and significantly overshadow proposed residential accommodation. As such, the proposal is contrary to the guidance of National Planning Policy Framework (paragraphs 139, 215 and 216); and London Plan (2021) policies D3 (Optimising site capacity through the design-led approach), D6 (Housing quality and standards) and HC1 (Heritage conservation and growth); and Local Plan (2020) policies LP1 (Design Quality and Local Character, LP3 (Designated Heritage Assets) and LP4 (Non-Designated Heritage Assets).

8.1.2 - Affordable Workspace

The proposed development would neither reprovide the maximum economically feasible amount of low cost employment floorspace nor a minimum of 10% of the gross new employment floorspace as Affordable Workspace in the Shoreditch Priority Office Area. The shortfall is not adequately justified by the submitted viability information. As such the proposed development is contrary to policy E3 (Affordable Workspace) of the London Plan (2021); and policy LP29 (Affordable Workspace and Low Cost Employment Floorspace) of the Hackney Local Plan 2033 (2020).

8.2 Recommendation B

That Listed Building Consent be REFUSED, for the following reasons:

8.2.1 - Works that do not benefit from planning permission.

The development proposed within the smaller red line boundary of the Listed Building Consent does not benefit from planning permission. As such, Listed Building Consent should be refused.

8.3 Recommendation C

That the Sub-Committee grants delegated authority to the Assistant Director of Planning & Building Control (or in their absence either the Growth Team Manager or DM and Enforcement Manager) to make any minor alterations, additions or deletions to the recommended reasons for refusal as set out in this report, provided this authority shall be exercised after consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee (who may request that such alterations, additions or deletions be first approved by the Sub-Committee).

Signed..... Date.....

Natalie Broughton - Assistant Director of Planning & Building Control

N O.	BACKGROUND PAPERS	NAME/DESIGNATION AND TELEPHONE EXTENSION OF ORIGINAL COPY	LOCATION CONTACT OFFICER
1.	<p>Application documents and LBH policies/guidance referred to in this report are available for inspection on the Council's website.</p> <p>Policy/guidance from other authorities/bodies referred to in this report are available for inspection on the website of the relevant authorities/bodies</p> <p>Other background papers referred to in this report are available for inspection upon request to the officer named in this section.</p> <p>All documents that are material to the preparation of this report are referenced in the report.</p>	Nick Bovaird x8291	Hackney Service Centre, Hillman Street, London E8 1FB

APPENDIX A – Site photos



Grade II* Listed Phillip Webb buildings on Worship Street.



Worship Street looking west from Phillip Webb Buildings



Worship street, looking east towards Phillip Webb Buildings from Worship Square.



Corner of Curtain Road and Worship Street (Queen of Hoxton in foreground).



Curtain Road, looking south

Deterioration of heritage fabric in Grade II* listed buildings







Curtain Road looking north:



Scrutton Street, with 58-62 Scrutton Street left vacant in foreground:



Corner of Scrutton Street and Curtain Road:





52-54 Scrutton Street (site of proposed Affordable Workspace):



48-50 Scrutton Street (to be demolished):



View from Scrutton Street east, towards junction with Holywell Row. Cream building to be demolished.



24-25 Holywell Row, to be retained.



View from Phipp Street, looking north:



Holywell Row buildings on right, part of the urban block but outside of site boundary:



Holywell Row looking south west:



Cream building (32-38 Scrutton Street) to be demolished to provide an entryway to the site and proposed Mason Building.

