



## THE FRIENDS OF ST KATHARINE DOCKS

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16<sup>th</sup> November 2022

Dear Sir / Madam

I am writing on behalf of the Friends of St Katharine Docks (FOSKD) in respect of Planning Application PA/21/01327/A1 for the new Chinese Embassy development in London on the 5.4 acre Royal Mint Court site at Tower Hill. I understand that this application is due to be decided by the London Borough of Tower Hamlets (LBTH) Strategic Development Committee on 1st December 2022.

FOSKD did submit an interim letter of representation on this planning application dated 30<sup>th</sup> July 2021, a copy of which is attached to this submission for completeness.

I am the Chairman of FOSKD which is a residents association operating under a constitution drawn up in 2011. The aims of FOSKD are to promote, protect, and enhance the area known as St Katharine Docks (the Dock) and its surrounding areas to the benefit of the community that lives in, works in and visits the Dock. FOSKD is managed by an Executive Committee with a subscription-based residential membership currently in the region of 435 members and has been recognised by the LBTH in its Cabinet decision dated 5th February 2014 regarding the establishment of Neighbourhood Planning Areas and Forums, as the representative group for the St. Katharine Docks area. St Katharine Docks is on the opposite side of the road (East Smithfield) to the proposed Embassy site at Royal Mint Court, Tower Hill.

At the time of writing, this Planning Application consists of 382 documents:

[https://development.towerhamlets.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR\\_135435](https://development.towerhamlets.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_135435)

I was contacted in November 2020, by Miss Yuzi Xia the Minister responsible for this project, who is based at the existing Chinese Embassy in Portland Place, London. Miss Xia invited FOSKD to engage in a consultation process about this Application, to which we agreed. During the period from when contact was first made to the current date, members of the FOSKD Committee have had three online meetings with the Minister and her team consisting of other Embassy staff and their external professional advisors.

Two of us from the FOSKD Committee also had a site visit. I assumed that I had been contacted directly by the Minister because as Chairman of FOSKD, I was involved in the previous consultation process for the Royal Mint Court site when the property developer, Delancey, were granted planning consent by LBTH in February 2017 to build an office / retail development on the site at the eastern edge of the City of London. The FOSKD Committee wrote a letter of support to the LBTH Planning Dept in favour of the Delancey scheme, as we felt it was a suitable use of the site and a good quality scheme for Royal Mint Court which is part of the Tower Conservation area sitting across the major arterial road junction at Tower Hill from The Tower of London and at the north end of the iconic Tower Bridge.

We have also been engaged in a separate consultation process consisting of several online meetings as well as some face-to-face meetings, with members of the LBTH Council Development Management Team (Planning & Building Control Service), the MET Police in Tower Hamlets & Hackney, the City of London Police, and representatives from Transport for London (TFL). These meetings have been facilitated by the Director of Community Safety in LBTH Council. Members of the Committee of the Royal Mint Court Residents Association (RMCRA) have also attended the majority of the online “LBTH Council” meetings with us. The RMCRA was specifically formed to address the fact that the residents of the 100 apartments in the St Mary Graces Court building on the west side of Cartwright Street are now living on land owned by the People’s Republic of China (PRC) because the eastern perimeter of the Royal Mint Court site as purchased by the PRC encompasses that building which is less than approximately 10 metres from the “red line” perimeter of the proposed Embassy campus, separated by a wooden fence as per the proposed plans.

However, in May 2018 the high profile & historically significant Royal Mint Court site was sold by Delancey & the LRC Group, to the PRC. It was reported in the press that the PRC had been searching for a location to build their new Embassy that fulfilled their vision to create a campus of significant global & strategic importance to enable them to consolidate a number of their operations in the West End of London onto one site. If planning permission is granted, the new facility across approx. 700,000 sq ft will be one of the largest Embassies in the world, and it will provide much more than just an Embassy headquarters. It will contain 230 apartments in which to house staff and visiting dignitaries, the Ambassador’s residence, a visa section, and a Cultural Exchange Centre.

The following are the areas of concern which we still have regarding this Application:

**The adverse effect on the residential amenity of neighbours, which may include nuisance, noise & disturbance and loss of privacy**

If permission is granted for this Application, this will be the first Embassy to be located in LBTH. The majority of Embassies in London are in the West End with the American Embassy having recently relocated from Grosvenor Square to Nine Elms, south of the

Thames. It is not unusual for Embassy buildings to attract protestors & demonstrations outside their buildings. Therefore, it's not unreasonable to anticipate such activities will take place around the perimeter of Royal Mint Court if the application is granted. The pavements around the perimeter of Royal Mint Court are in the main very narrow and it would not take many protestors to gather before they spilled out onto the road network. This would have the potential in this case to create nuisance and be very noisy for neighbours. It would also block the major arterial junction at Tower Hill and consequently the important river crossing via Tower Bridge as well as the route between the City of London and Canary Wharf and the important route from west to east London and vice versa. Disruption of this sort has been witnessed over the years caused by a variety of disaffected groups, who make use of the iconic setting at Tower Hill junction to attract the world's media to their cause. Such demonstrations can and do last for several hours, causing huge tailbacks of vehicles for some miles from the junction. On numerous occasions pedestrians have also been prevented by the Police from walking across the junction during a demonstration.

We have asked what steps the Applicant would take to help mitigate such disruption if it were to occur, but to date the only response we have received is that it would be the responsibility of the MET Police to manage whatever may occur outside the diplomatic "red line" outside of the perimeter walls. With regards to the impact on privacy of residents, we have two concerns, one of which is that we are aware there are plans for a CCTV operation to be installed on the site by the Applicant. We anticipate that LBTH Council will also have CCTV cameras in the area. These operations will affect the privacy of residents as they move around the local area, for instance walking to and from Tower Hill tube station or the DLR Gateway station, both of which are located on Tower Hill. The potential for surveillance and possible tracking of individuals is clear.

With regards to privacy issues, we are particularly concerned for the residents of the 100 flats in St Mary Graces Court in Cartwright Street. The rear elevation of these flats where many have their bedroom windows, are within approximately 10 metres or less from what will be a wooden fence separating them from the service road of the proposed Embassy, running from south to north from East Smithfield to Royal Mint Street, parallel to Cartwright Street on the eastern side of the Embassy site. The residential building on the Embassy site which will contain 230 flats, is right beside this service road and directly overlooking the St Mary Graces Court flats. It is difficult to see from the plans how the privacy of the existing residents in St Mary Graces Court can be preserved in this situation, although there is some mention in the plans of building balconies which will be recessed into the repurposed office building on the site where Embassy staff and visitors to the Embassy will be housed.

We understand that events will be held in the proposed Cultural Exchange Centre. The arrival and departure of large numbers of guests for these events will also potentially cause nuisance, noise and disruption for neighbouring residents. We understand that the Planning Officers have spoken to the Applicant about providing an Events

Management Plan, something which TFL have also requested, as the increased traffic around events has the potential to cause hold-ups on East Smithfield which is already very busy, as well as at the Tower Hill Junction where dignitaries will be driven into the site through the front gates. Our understanding is that this Events Plan is to be secured as part of a Section 106 obligation, so we have not been able to view any such plan, but we consider it a material issue in respect of this site being granted permission as an Embassy site.

### **Safety and Security of residents, nearby office workers and the public**

Having already mentioned the possibility of protests and demonstrations outside the front of the proposed Embassy site, the only information we as residents have had during this consultation from the MET Police in Tower Hamlets & Hackney about how the policing of the site will be managed, is that they say they will have access to whatever resources are necessary to deal with any incident which might occur. A representative of the City of London Police who attended one of our online meetings confirmed that their force would be able to provide necessary back-up, if required, if they had personnel available at the time. Other than the fact we have been told that Counter Terrorism Security Advisors and Parliamentary and Diplomatic Protection (a branch of Protection Command within the Specialist Operations Directorate) of the MET Police, have both looked at this Planning Application, we have no other information on how the safety and security of residents, office workers and the general public will be assured if planning consent is granted.

As this Application is for the purpose of building an Embassy, it is proposed in the plans that the service road on the site as described above, will contain a “security lock” area, in which vehicles will be searched by onsite security guards shortly after vehicles access the service road from the busy main road (East Smithfield), before they are allowed to proceed further up the service road. This service road is where the staff living on site will enter the site in their vehicles to park in their basement carpark, as well being the access for all delivery vehicles.

We have had discussions during our online meetings with the Council team and Met Police about the vulnerability of the residents in St Mary Graces Court flats, should there be an incident in that service road involving an explosive device so close to the rear of their flats, separated as they are, only by a wooden fence. As part of those discussions, the RMCRA requested that LBTH Council commission a Blast Assessment Report. We have been told that this report has been produced as long ago as August 2022. Currently there is an ongoing discussion about the independence of the company who entered a contract with the Council to produce this report, because a division of that company is working for the Applicant. We believe the work of producing the report was in fact subcontracted to another company (whose name we are unaware of), by the company who won the Council tender to produce it.

Because the report contains sensitive security information, we have not been allowed access to even a redacted copy of it, as individuals need to have a certain level of security clearance to be allowed to read it. We were told that the MET Police having seen the Blast Assessment Report, may write a “note” for residents to let us have some idea of what the report contains, but as of today’s date we have not received any information on this matter from the MET Police.

### **Highway Safety**

For those unfamiliar with the area, from Tower Hill towards the east, the road running past the proposed Embassy site is called East Smithfield. This is an extremely busy dual carriageway, with a great deal of commercial traffic on it including heavy construction lorries. We would describe it as a “hostile environment” which local residents try to avoid walking along, preferring instead to walk through St Katharine Docks instead, to avoid walking alongside what is one of the most polluted roads in London.

From Tower Hill going east, on the south side of East Smithfield (so directly opposite the proposed Embassy site) are two large office blocks, Tower Bridge House, constructed from mainly steel and glass and Commodity Quay, a brick-built building with huge glass windows. Between them, these two buildings can hold up to 3500 office workers. Further east along East Smithfield and still opposite the proposed Embassy site, there are some of the 220 residential flats which constitute the City Quay development within St Katharine Docks. These buildings make up what is a densely populated area directly opposite the proposed Embassy site.

The cobbled driveway into the St Katharine Docks estate off East Smithfield, is directly opposite the entrance to the service road for the proposed Embassy site. This Docks driveway also acts as the service road for many of the 25 licensed restaurants and bars in the Docks and is busy with lorries delivering to retail units from Monday to Friday, as well as lorries collecting refuse. An underground car park for office staff is also accessed via this driveway. It is proposed in the plans that a “Keep Clear” sign will be painted on the road at the entrance to the proposed Embassy service road – there is already such a sign on the road at the end of the Docks driveway. Our concern is that any vehicles exiting the Docks driveway and wishing to turn right along East Smithfield will find it difficult to do so if eastbound traffic on the opposite side of the carriageway is already being held at a “Keep Clear” sign in front of the proposed Embassy service road. We are concerned for the safety of cyclists, pedestrians and motorists in this situation.

**St Katharine Docks, in common with the Royal Mint Court site, which is the subject of this Planning Application, both sit within the Tower of London Conservation area. This is an historic area of our capital city containing landmark structures known throughout the world, including the iconic Tower Bridge. Having spent the last two years participating in meetings and discussions about the proposed Planning Application for**

**the Royal Mint Court to become the site of an Embassy, our considered view is that this particular site, because of the narrow pavements outside its perimeter walls and its position next to a major arterial road network junction at Tower Hill and the many residential properties surrounding it (not least the St Mary Graces Court residential building now sitting on land owned by the Applicant), means that it is not, in our opinion, a suitable site for this particular use, with all the restrictions it will by necessity bring with it. We therefore ask that this Planning Application be rejected.**

**Yours faithfully,**

**Ms S. M. Hughes**

**Chairman, FOSKD**