

Shoreditch Works

In the London Borough of Hackney

Planning Application reference: 2024/2201 and 2024/2162

Planning Application

Town & Country Planning Act 1990 (as amended); Planning (Listed Building and Conservation Areas) Act 1990; Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 and Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Planning application 2024/2201

Phased redevelopment of the site to provide an office-led, mixed use development (including commercial, business and service (Use Class E), Urban Room (Sui Generis) and residential (Use Class C3) uses) comprising a variety of: retention and / or extension; part demolition and adaptation; demolition; and provision of new buildings, resulting in buildings of different uses plus basement excavation, together with new public, private, and communal open space, hard and soft landscaping, and other associated and ancillary works.

Listed building consent 2024/2162

Internal and external works, including the demolition of later rear additions, to 91-101 Worship Street to provide for their use as dwelling houses. Internal and external works to 103-105 Worship Street including the demolition of later rear additions, to provide for the continued commercial and residential use of 105 Worship Street and a new flat at first floor and above at 103 Worship Street with ground floor commercial. New hard and soft landscaping, and other associated and ancillary works.

The applicant

The applicant is **Linea Properties Limited** and the agent is **Montagu Evans**.

Recommendation

The Deputy Mayor for Planning, Regeneration and the Fire Service, acting as Local Planning Authority for the purpose of determining this application;

- grants conditional planning permission in respect of planning application 2024/2201 for the reasons set out in the approval section below, and subject to the prior completion of a section 106 legal agreement;
- grants conditional listed building consent in respect of application 2024/2162 for the reasons set out in the approval section below;

- delegates authority to the Head of Development Management to issue the planning permission and attach, add, delete or vary, the final detailed wording of the conditions and informatives as required with any material changes being referred back to the Deputy Mayor, and authority to negotiate, agree the final wording, and sign and execute, and complete the section 106 legal agreement;
- delegates authority to the Head of Development Management to agree any variations to the proposed heads of terms for the section 106 legal agreement;
- delegates authority to the Head of Development Management to refer the application back to the Deputy Mayor, if by 21 January 2027 the section 106 legal agreement has not been completed;
- notes that approval of details pursuant to conditions imposed on the planning permission will be submitted to, and determined by Hackney Council; and
- notes that Hackney Council will be responsible for the enforcement of the conditions attached to the permission.

Introduction

1. Having assumed authority to determine this planning application, this report sets out the matters that the Deputy Mayor for Planning, Regeneration and the Fire Service must consider in determining whether to grant or refuse planning permission and to guide his decision making at the upcoming representation hearing. This report includes a recommendation from GLA officers, as set out below.

Officer recommendation - reasons for approval

2. The Deputy Mayor for Planning, Regeneration, and the Fire Service, under delegation, acting as the local planning authority, has considered the particular circumstances of this application against national, strategic and local planning policy, relevant supplementary planning guidance and all material planning considerations. He has also had regard to Hackney Council's Planning Committee reports dated 4 February 2026 (including the Planning Sub-Committee Supplementary Addendum dated 4 February 2026) and 11 March 2026, including the draft conditions and Heads of Terms prepared by Hackney Council, setting out the reasons for refusal and all consultation responses and representations made on the case both to Hackney Council and the GLA. The below reasons set out why this application is considered to be acceptable in planning policy terms:
 - The office-led redevelopment and optimisation of a brownfield site in the City Fringe Opportunity Area, the Central Activities Zone (CAZ) and the Shoreditch Priority Office Area is supported. The scheme would deliver 57,165 sq.m. (GIA) of office and employment floorspace, which would contribute approximately 55% of the Local Plan's new office floorspace

target for the plan period. The scheme would also deliver at least 8.3% of the jobs identified for the Opportunity Area.

- The scheme would deliver a high quality design and standard of residential accommodation in a Fast Track Route compliant scheme of 35% affordable housing.
- The proposal demonstrates a design-led approach and would open up a site currently inaccessible to the public to provide 3,600 sq.m. of new public realm and would introduce new public routes and increased permeability through the site.
- The visual, functional, environmental and cumulative impacts of the proposed tall buildings would be acceptable in accordance with London Plan Policy D9 (Part C).
- While the proposal would result in a low to high level harm to the significance to a number of heritage assets surrounding the site and the South Shoreditch Conservation Area, the proposals would provide significant public benefits which would outweigh this harm.
- Appropriate, relevant, reasonable and necessary planning conditions and obligations are proposed to ensure the proposal is acceptable in planning terms and the environmental impacts are mitigated, in line with Policies DF1 and T9 of the London Plan.
- Applying section 38(6) of the 2004 Act, it is GLA officers' view that the proposal accords with the relevant development plan, when read as a whole. The material considerations, when taken together, do not justify a departure from the plan but rather confirm that the proposals should be granted planning permission.

S106 legal agreement

3. The following heads of terms have been agreed as a basis for the planning obligations to be contained within the section 106 legal agreement:

Affordable housing and residential delivery

- Provision of 27 affordable housing units comprising:
 - 16 social rent units (5 x studio, 4 x one-bed, 6 x two-bed, 1 x three-bed)
 - 11 intermediate units (5 x one-bed, 6 x two-bed)
- Early stage viability review if an agreed level of progress is not reached.
- Delivery of the affordable housing as follows:
 - 75% of the affordable housing to be completed and ready for occupation before occupation of 50% of the market housing.
 - All of the affordable housing to be completed and ready for occupation before occupation of 75% of the market housing.

- Delivery of all residential units before occupation of 85% of the newly constructed market commercial floorspace

Affordable workspace

- Provision of 2,248 sqm (NIA) affordable workspace.
- No occupation of the Verso Building until all affordable workspace in St James Place is ready for occupation. Any other affordable workspace to be provided before occupation of 85% of the commercial floorspace.
- Minimum aggregate discount of 60% across all affordable workspace (excluding voids and other unlet areas) based on comparable office space in the area. Within this, there must be the following minimum discounts:
 - Minimum 20% and maximum 80% discount for affordable office and co-working spaces;
 - Minimum 60% and maximum 95% discount for all other forms of affordable workspace.
- Affordable workspace statements setting out how the affordable workspace will be delivered and managed to be approved by the Council.
- Annual monitoring reports on the affordable workspace, including rent levels.

Urban Room

- Provision of 621 sqm (NIA) urban room.
- No occupation of the Verso Building until the Urban Room is ready for occupation.
- Minimum discount of 20% (on a non-aggregated basis) for comparable unrestricted Class E space.
- Annual free community access as follows:
 - 100% of the space to be available for 15 full days or 30 half days per annum;
 - 50% of the space to be available for 15 full days or 30 half days per annum; and
 - 25% of the space to be available for 100 half days per annum.

- Delivery plan and management strategy to be prepared in consultation with the steering group and approved by the Council.
- Remedial action plan in the event of material non-compliance.
- Establishment of a steering group to govern and manage use of the space.
- Monitoring reports on management of the Urban Room to be submitted to the Council.

Listed building works

- Delivery of all listed building works before occupation of 85% of the newly commercial floorspace.

Architect retention

- Retention of KPF Architects and Richard Griffiths Architects and approval of any replacement.

Phasing plan

- Works to be carried out in accordance with the phasing plan, unless otherwise agreed.

Energy

- Carbon offset contribution payable in respect of each building.
- Be seen energy monitoring clauses.

Highways and Public Realm

- Commercial and residential occupiers to be ineligible to apply for parking permits, unless disabled person's badge holders.
- Works to the highway (including 9 disabled parking spaces) and off-site public realm to be specified in the section 106 agreement, with delivery secured in a future section 278 agreement which will make provision for delivery by the Council at the owner's cost.
- £393,971 communal open space shortfall contribution.
- £9,000 travel plan monitoring fee.
- £17,500 construction management plan monitoring fee.
- £2,000 delivery and servicing management plan monitoring fee.

- £10,000 contribution towards an electric vehicle car club.
- Future residents to be provided with free car club membership and at least £60 driver credit.
- Delivery of, and public access to, on-site public realm and Council approval of public realm delivery strategy and management plans.

Transport for London

- £561,374.24 contribution towards the Shoreditch Road Safety Improvement scheme.
- £250,000 contribution towards Shoreditch High Street Station capacity improvements.
- £100,000 contribution for safeguarding and provision of a cycle hire docking station.

Employment and skills

- £352,687.50 construction and demolition employment and training contribution.
- £1,320,451.20 end use employment and training contribution.
- Commitment to the Council's employment, skills and local procurement initiatives, including an employment and skills plan.
- Employment of at least one Hackney-based construction apprenticeships per £2 million of construction contract value.
- Apprentice support fee of £1,500 per apprentice.
- Apprentice shortfall contribution of £7,000 per apprentice not provided.
- Compliance with and membership to the Considerate Constructors Scheme.

Biodiversity Net Gain

- £17,309.61 biodiversity net gain monitoring fee.

Education

- £162,759.10 education contribution.

General obligations

- Council and GLA's legal fees to be paid by the applicant.

- £40,825 monitoring fee.
- All payments to be index linked.

Conditions to be secured

4. See Draft Decision Notices published alongside this report.

Site description and surrounding area

5. The site is approximately 1.4 hectares and occupies most of a triangular urban block bound by Curtain Road to the east; Worship Street to the south; and Clifton Street, Holywell Row and Scrutton Street to the north-west. The existing buildings are 3-6 storeys with the edges of the site comprising external/public-facing buildings, and there are a number of yards in the centre of the site. The site does not include any public through-routes. There are currently a mix of commercial and residential uses on the site, including 38 existing residential units.

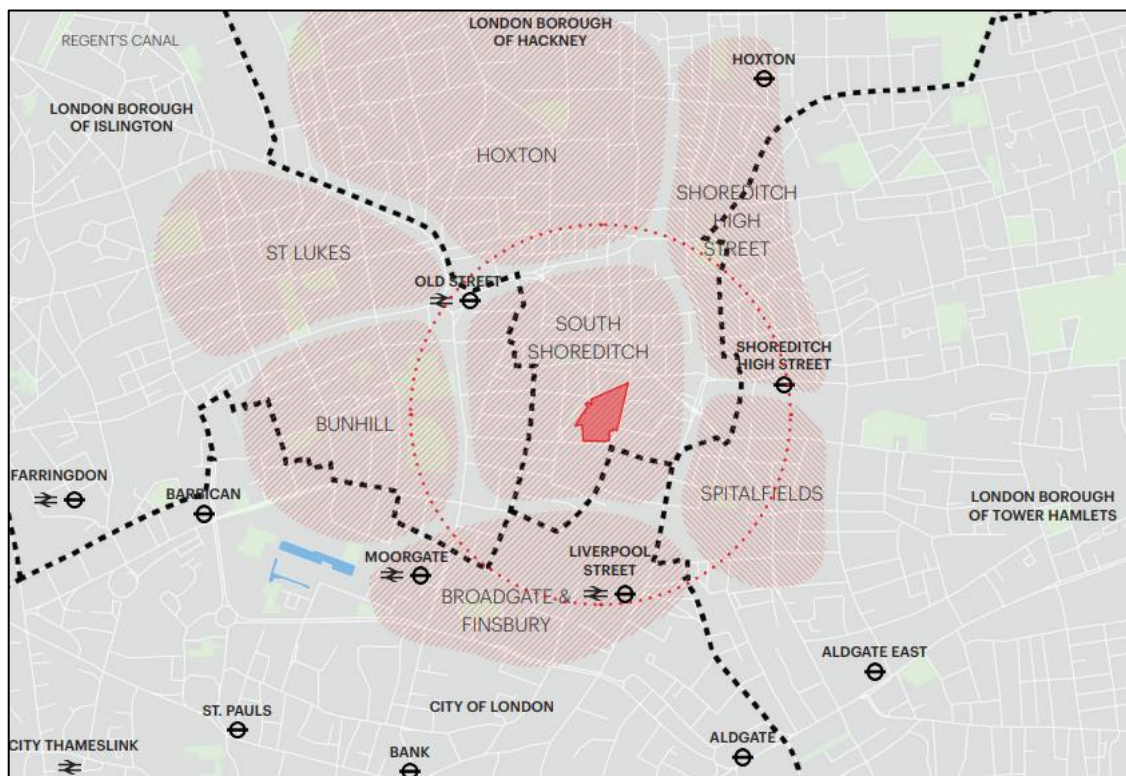


Figure 1 Site location and surrounds

6. The site is within the South Shoreditch Conservation Area and includes Grade II* (91-101 Worship Street) and Grade II (103-105 Worship Street) listed buildings; as well as locally listed buildings on Holywell Row, Clifton Street, Worship Street, and Curtain Road. The south-east corner of the site is within the Background Wider Setting Consultation Area of the Protected Vista from London View Management Framework (LVMF) Assessment Point 8A.1 'Westminster Pier to St. Paul's Cathedral'. The site also includes a historical

burial ground, Holywell Mount Burial Ground, and is within the Tier 2 Shoreditch Archaeological Priority Area.

7. The site is within the City Fringe/Tech City Opportunity Area and the Central Activities Zone (CAZ). The boundary with the City of London is at the south-east corner of the site; the boundary with the London Borough of Islington is approximately 80 metres to the west; and the boundary with the London Borough of Tower Hamlets is approximately 150 metres to the east. At a local level, the site is allocated in the Future Shoreditch draft Area Action Plan (AAP) for office-led mixed-use development and is within the Shoreditch Priority Office Area and the Hackney Major Town Centre: Hackney CAZ.

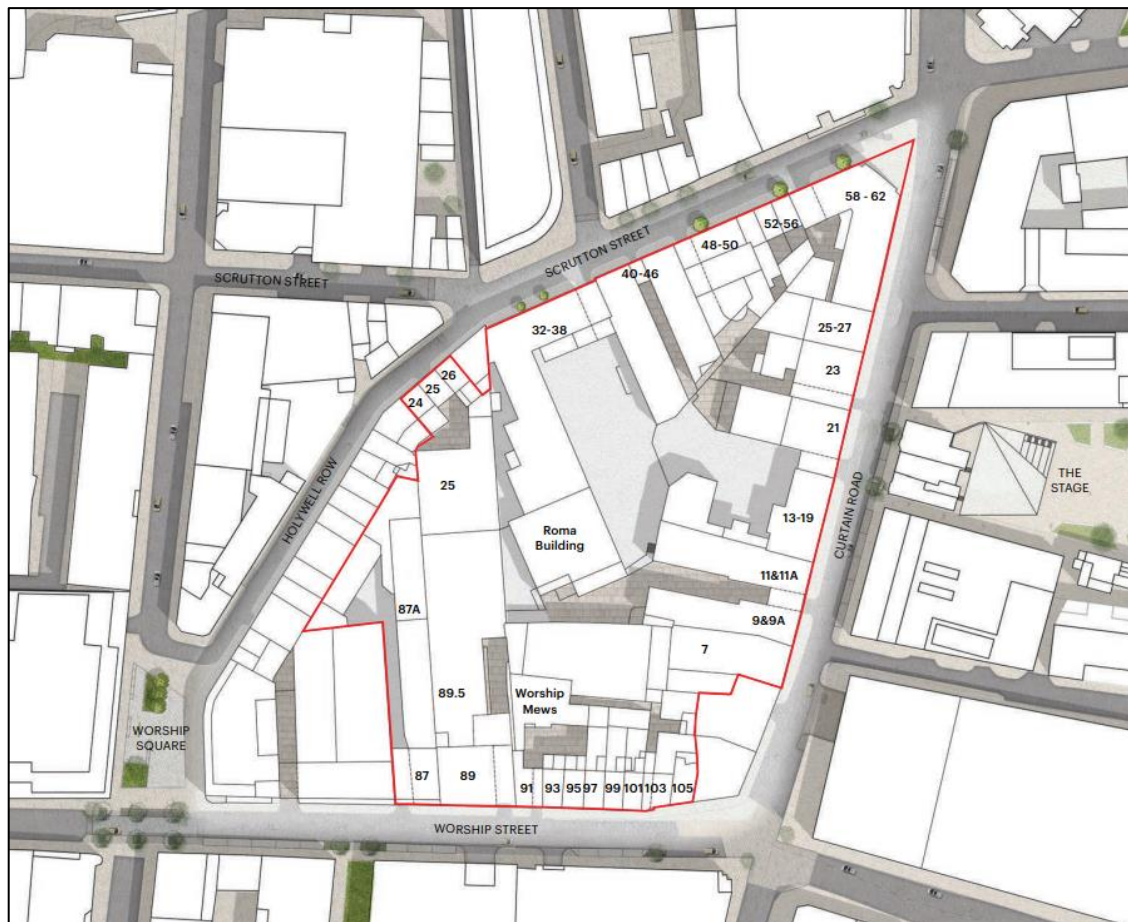


Figure 2 Existing site plan

8. The site is located within the Old Street City Road/Old Street/Great Eastern Street/Shoreditch High Street Air Quality Focus Area (AQFA). The site is also within the borough-wide Air Quality Management Area (AQMA) for exceedances of Particulate Matter PM₁₀ and nitrogen dioxide (NO₂).
9. The site has a Public Transport Access Level rating (PTAL) of 6b, on a scale of 0-6b, where 6b is highest. Shoreditch High Street (London Overground), Liverpool Street (London Underground, Elizabeth Line, and National Rail), Old Street (London Underground and National Rail) and Moorgate (London Underground, Elizabeth Line and National Rail) stations are all within walking distance of the site. The closest bus stop is located approximately 350m to the

north of the site and there are 22 bus routes within walking distance. The site is well connected to various cycle routes and several Cycleways and Quietways serve this area, and the closest Cycle Hire Docking Station approximately 70 metres to the north-west of the site on Clifton Street. The existing site provides 25 marked car parking spaces within it.

10. The site is located in an area of mixed-use, with a variety of mixed-use, residential and commercial developments nearby. To the east of the site are mixed-use developments Principal Place and The Stage which both include tall residential towers (50 storeys and 37 storeys respectively) and large mid-rise office buildings (7 to 10 storeys). To the south are tall office buildings within the City of London, with the city cluster further to the south. To the south and west the conservation area townscape is characterised by low to mid rise buildings in mixed uses.

Details of the proposal

11. The application proposes a commercially led mixed-use development comprising demolition, alteration (including extensions and refurbishment works) to existing buildings (including heritage assets), and construction to provide the below floor areas exclude associated plant and amenity:
 - A total of 57,165 sq.m. (GIA) office floor space (Use Class E);
 - 3,287 sq.m. retail floorspace (Use Class E);
 - 663 sq.m. (GIA) Urban Room (Sui Generis); and
 - 78 residential units (Use Class C3).
12. The proposal would comprise 11 plots comprising buildings between 2 and 18 storeys (plus basements and plant), the details of which are set out in Table 1 below. The proposal proposes to open up the site which is currently inaccessible by the public to create public access routes through the site and creation of new on-site public realm, including creation of the “Rose Yard” at the centre of the site. The proposal would deliver 2,840 sq.m. of on-site public realm which would be publicly accessible.
13. The proposal also includes the Urban Room which is intended to be a flexible use space for a range of events, exhibitions, networking and education, for use by the community and local enterprises. The Urban Room is designed to open up into the Rose Yard to enable the combined use of the spaces for events.

Building	Use/s	Height	Floorspace (GIA)
Verso building	Office (Class E), Urban Room (Sui	18 storeys, plus two storey basement	41,819 sq.m.

	Generis)		
St James's House	Office (Class E) and flexible Class E	8 storeys, plus two storey basement	13,032 sq.m.
St James's Place	Office (Class E)	Part-3 and part-4 storeys, plus basement	2,547 sq.m.
Mason Building	Office (Class E) and flexible Class E	5 storeys, plus two storey basement	3,994 sq.m.
Holywell Court	Office (Class E) and flexible Class E	5 storeys, plus basement	3,122 sq.m.
87-89 Worship Street	Office (Class E), Residential (Class C)	4 storeys, plus Basement	1,525 sq.m.
Carman House	Office (Class E) and flexible Class E	5 storeys, plus two storey basement	5,524 sq.m.
103 & 105 Worship Street	Flexible Class E, Residential (C3)	4 storeys, plus basement	325 sq.m.
Webb Mews	Residential (C3)	2 storeys	430 sq.m.
24-26 Holywell Row	Residential (C3)	Part-3 part-4 storeys	342 sq.m.
Webb Terraces (91-101 Worship Street)	Flexible Class E, Residential (C3)	4 storeys, plus basement	1,126 sq.m.
Holywell Mansions and Morris Mews	Flexible Class E, Residential (C3)	9 storeys, plus basement	4,858 sq.m.

Table 1: Breakdown of proposed building floorspace (inclusive of plant and amenity)



Figure 3: Proposed site plan showing building names / numbers, as well as phasing (Phase 1: blue; Phase 2: green; Phase 3: red; Phase 4: orange)

Relevant planning history

14. The application site is made up of several existing buildings under different ownership, and has an extensive planning history which is set out in detail in Section 3 of the Council's Committee Report, and is reproduced below.

- 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.
- 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 to restaurant use (2018/0663) and to shisha lounge (2023/0935 and 2024/1470).
- 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.
- 48 - 50 Scrutton Street
 - 2015/4523: Replacement doors and glazing to ground floor elevation on Scrutton Street. Granted
- 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
- 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
- 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
- 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
- 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
- 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
- 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
- 91 Worship Street
 - SOUTH/363/96/CLU: Certificate of lawfulness for use for class a3 purposes (sandwich bar). Granted
- 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.

- 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
- 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
- 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
- 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
- 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
- 23 Curtain Road
 - 2008/1482: Existing use of the building as offices (Class B1 use). Granted
- 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

15. Enforcement history:

- 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

16. Appeal history:

- 54-56 Scrutton Street

- APP/U5360/W/24/3352542: Change of use from retail to shisha lounge (app 2024/1470). Appeal Dismissed
- APP/U5360/W/23/3333340: Change of use from retail to shisha lounge (app 2023/0935). Appeal Dismissed
- W/18/3214034: Change of use from retail to restaurant (app 2018/0663). Appeal Dismissed
- 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.

Pre-application

17. The GLA issued pre-application advice on 16 March 2023 giving broad in principle support for the commercial-led mixed-use development, however, GLA officers considered issues with respect to loss of existing uses; the quantum of development; heritage; and quality of public open space must be addressed in advance of an application being made.
18. The applicant engaged the GLA for a follow-up pre-application, for which GLA officers issued advice on 14 July 2023. GLA officers retained in principle support for the proposed development and welcomed design changes, including reduction in the quantum and height of the Verso building, and an increased number of residential units. However, GLA officers noted there were still concerns about heritage impacts, primarily arising from the height and massing of the Verso building.
19. The applicant engaged with the Council in 12 pre-application discussions between August 2022 and June 2024 as part of a Planning Performance Agreement. The applicant also engaged the Council's Design Review Panel (DRP) initially on 29 November 2023 and again on 16 January 2024 with a revised scheme similar to that submitted.

The application

Stage 1

20. On 1 April 2025 the Mayor of London received documents from Hackney Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under the following categories of the Schedule to the Order 2008:
 - 1B(b): *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes*

the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres”; and

- 1C(c): *“Development which comprises or includes the erection of a building more than 30 metres high outside the City of London.”*

21. On 9 June 2025 the Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority considered planning report [GLA/2025/0275/01](#)¹ and subsequently advised Hackney Council:

- **Land Use Principles:** The mixed-use development would align with the 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 Mayors 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. 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, and appropriate mitigation should be secured prior to Stage 2.

Council consideration

22. On 4 February 2026 the Hackney Planning Sub-Committee voted 5:2 against the officer recommendation to refuse the planning application, and subsequently deferred the decision. The London Borough of Hackney’s draft decision notice which informed this decision includes the following reasons for refusal:
- i. The proposed development by reason of its design, scale and positioning, would result in an incompatible and obtrusive development which would

¹ <https://planapps.london.gov.uk/planningapps/2024-2201>

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).

- ii. 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).
23. It is noted that Hackney Council added this scheme to its Planning Sub-Committee agenda for 11 March 2026. The Committee report was published on 4 March 2026 with an officer recommendation for refusal, citing the same reasons for refusal as above.
24. Under the provisions of Article 7 (5) of the Town and Country Planning (Mayor of London) Order 2008 (“the 2008 Order”), where an authority has failed to determine an application within the statutory 16 week determination period, and an applicant has submitted a request, the Mayor may issue a direction that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application.
25. On 3 March 2026, Montagu Evans, on behalf of the applicant Linea Properties Limited, wrote to the Mayor making a request pursuant to paragraph 7(6) of the 2008 Order that the Mayor become the local planning authority for this application.

Stage 2

26. On 9 March 2026, the Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority, considered the GLA Stage 2 report (Ref: [GLA/2025/0505/S2²](https://planapps.london.gov.uk/planningapps/2024-2201)) and called in the planning application and linked listed building consent application. The GLA Stage 2 report concluded that, having regard to the details of the application:

² <https://planapps.london.gov.uk/planningapps/2024-2201>

- a) The development would have a significant impact on the implementation of the London Plan by way of employment, housing delivery and affordable housing delivery;
 - b) The development would have a significant effect on more than one London Borough whereby the site is located within the City Fringe / Tech City Opportunity Area which comprises land within the London Borough's of Hackney, Islington and Tower Hamlets;
 - c) The development would have a significant effect on more than one London Borough whereby the site is within the Central Activities Zone which the London Plan recognises as providing one third of London's jobs and generates almost 10 per cent of the UK's output, which includes land across several London Borough's;
 - d) There are sound planning reasons for intervening.
27. The GLA's Stage 2 report outlined outstanding matters including affordable housing; urban design; heritage; transport; environment and sustainable infrastructure issues.

Stage 3 (call in)

28. Following the Deputy Mayor's decision to call-in the planning application, on 30 April 2026 a subsequent letter was sent to Hackney Council advising that, under the provisions of Article 7 (2) of the 2008 Order, the Mayor is to act as the local authority for the purpose of determining any connected application, and would therefore also become the local planning authority for determining connected Listed Building Application 2024/2162.
29. The Deputy Mayor visited the site on 23 September 2026 with GLA and TfL officers, representatives of the Council, and the applicant team.
30. The Deputy Mayor's decision on this case, and the reasons for it, will be made available on the GLA's website www.london.gov.uk

Referral to the Secretary of State

31. The power of the Secretary of State to call-in an application also exists where the Mayor has called-in an application.

Relevant legislation, policies and guidance

32. The Deputy Mayor must determine the application for planning permission in accordance with the requirements of Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004. The Deputy Mayor is required to determine the application in accordance with the development plan unless material considerations indicate otherwise. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan consists of the Hackney

Local Plan 2033 (2020); parts of the Hackney Site Allocations Local Plan (2016) (including the application site allocation); and the London Plan (2021).

33. The National Planning Policy Framework (NPPF) was published on 17 August 2026 following a period of public consultation. The NPPF aims to set out national planning policy in a clearer and more comprehensive manner and incorporates a number of substantive reforms designed to boost housing supply and unlock economic growth. The NPPF contains a series of National Decision-Making Policies (NDMPs), which, whilst not afforded statutory weight, are material considerations where applicable.

34. Annex A, paragraph 2 of the NPPF states the following:

“Development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight. The only exception to this is where they have been examined and adopted or made against this Framework. Other development plan policies should not be given reduced weight simply because they were adopted prior to the publication of this Framework.”

The relevant NDMPs, along with the consistency of the development plan with them, are discussed and considered throughout this report.

35. The Deputy Mayor is also required to have regard, as material considerations, to national planning guidance, as well as supplementary planning documents and, depending on their state of advancement, emerging elements of the development plan and other planning policies.

36. The relevant planning policies and guidance at the national, regional and local levels are as follows:

- National Planning Policy Framework (August 2026);
- National Planning Practice Guidance and Design Guide (as updated);
- City Fringe Opportunity Area Planning Framework (2015);
- Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), which can be found on the [GLA's website](#)³;
- London Borough of Hackney supplementary planning documents and guidance, which can be found on [Hackney Council's website](#)⁴; and
- Future Shoreditch (Regulation 19, Publication Version) draft AAP (2026).

³ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance>

⁴ <https://www.hackney.gov.uk/planning-and-building/planning-policies-and-local-plan/supplementary-planning-documents-and-guidance>

On 16 July 2026, the Mayor of London published the draft London Plan 2026 for consultation. The draft London Plan 2026 sets out proposals for how London could develop over the next 20-25 years, with the objective to make the best use of land; deliver the homes and neighbourhoods Londoners need; grow London's economy in a way that benefits all; and creating a greener, resilient and healthy city. Consultation on the draft London Plan closes on 15 October 2026. The draft London Plan 2026 is at a very early stage and, while emerging policies are considered throughout this report, only carries limited weight in planning decisions. Emerging policy can be a material consideration, with the degree of weight depending on its stage of preparation and the extent of unresolved objections.

Response to consultation

37. Hackney Council publicised the application by sending 562 notifications to local addresses and issuing site and press notices. The relevant statutory bodies were also consulted. Copies of all responses to public consultation, and any other representations made on the case, have been made available to the GLA.
38. Following the neighbourhood consultation process Hackney Council received a total of 64 responses (3 in objection and 61 in support). The reasons for objection and support raised as part of the neighbourhood consultation process are collectively summarised below.

Neighbourhood objections

- Overdevelopment.
- Verso tower design is too tall, bulky and dominant.
- Impacts to local character.
- Impacts to conservation area and heritage assets.
- Loss of amenity to neighbouring properties – daylight/sunlight and overlooking. Also concerns the daylight and sunlight assessment is not accurate.
- Increased noise and air pollution during construction and operation.
- Increased traffic congestion and parking stress.
- Concerns regarding servicing via Holywell Row – not adequate or servicing by HGV's and large vehicles.
- Impact on local infrastructure capacity including water supply, sewage systems and electricity.
- Development should align with local policies and housing need in respect of affordable housing provision.

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

Neighbourhood support

- Well designed.
- Improvement on existing.
- Amendments to Verso tower are an improvement.
- Sustainable design.
- Restoration and re-use of listed buildings welcomed.
- Principle of a tower is supported however, design should be taller and more elegant.
- Diverse mix of uses and workspaces to suit different users welcomed, and would provide opportunities for businesses to scale-up without disruption.
- Well-designed for knowledge-intensive businesses.
- Additional jobs, training and proposed long-term employment opportunities welcomed.
- Area needs regeneration.
- Local practitioners have been engaged throughout design process.
- Applicants have made extensive efforts to engage with future users of the site.
- Support social value commitments,
- Support provision of affordable workspace and principles behind it.
- Opportunity for Hackney to be a leader in the transition to more sustainable and regenerative economy.
- Support programming of the Urban Room, which should include educational activities, skills workshops and maker demonstrations.
- Support provision of infrastructure for emerging and established artists.
- Green and open spaces would contribute to a healthier environment for local families.

Responses from Councillors

39. Hackney Council received a letter of support from Councillor Anya Sizer (Hoxton east and Shoreditch), specifying this is a sustainability driven and

community inspired development that will transform this large brownfield site, deliver significant social value and help revitalise the local economy, and highlights the positives of involvement of local representatives.

Summary of statutory and local group consultee responses to Hackney Council

40. City of London: No objection. The approach taken to massing and the disposition of height and bulk seems suitable for this large, inner-city site adjacent to the hi-rise development characteristic of the nearby City Fringe. No impacts on heritage assets within the City of London or any pan-City views assessed in the TVIA.
41. Environment Agency: No objection. Conditions should be added in respect of Non-Road Going Mobile Machinery and BREEAM 'excellent' standard for water consumption or equivalent.
42. Hackney Society: Concerns raised about the scale and density of the proposals and the impact it would have on the quality of new public realm and private interiors. Height of the Verso building means it cannot constitute sustainable development. The Regenerative Business Hub is unlikely to live up to its fanfare, at best meeting Hackney's unambitious policy for provision of 10% affordable workspace, albeit alongside some potentially interesting public and communal spaces.
43. Heritage of London Trust: Support restoration of the Worship Street Drinking Fountain.
44. Historic England (HE): Provided an updated representation in response to the Hackney's re-consultation. This response maintained HE's view that the proposals would harm important designated heritage assets and does not appear to have development plan support and maintains the application should be refused or withdrawn.
45. Historic England Greater London Archaeology Advisory Service (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.
 - Advise the development could cause harm to the archaeological remains and field evaluation is needed to determine appropriate mitigation. 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 it is considered a two-stage archaeological condition could provide acceptable safeguard. This would comprise 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.

46. 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.
47. Health and Safety Executive (HSE): No objection. It is noted that HSE originally responded to Hackney with concern regarding the access arrangements and the arrangements for siting of fire appliances for firefighting purposes within Rose Yard/Rose Walk however, this concern has now been removed following review of further information and no objection is raised.
48. London Borough of Islington:
- 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 special character and appearance of Bunhill Fields and Finsbury Square Conservation Area.
 - GLA officer response: the Hackney Committee report acknowledges the absence of a view showing the impact of the proposal above the Wesley Chapel within the applicant’s Heritage Townscape and Visual Impact Assessment (HTVIA). Notwithstanding, the Committee report concludes that, following detailed analysis of the proposals, Council officers consider 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. As set out in the “Heritage” section of this report, GLA officers consider the scheme would have no effect on the setting or significance of the Bunhill Fields and Finsbury Square CA and are satisfied with the level on information provided within the applicant’s HTVIA to come to this conclusion. GLA officers also accept the HTVIA’s scoping out of the Wesley Chapel due to lack of intervisibility and, noting the distance between the Wesley Chapel and the application site and the identification of no harm to the aforementioned CA (which the Wesley Chapel is located within). GLA officers consider the proposals would have no effect on the setting or significance of the Wesley Chapel.

49. London Borough of Tower Hamlets: No comments.
50. London City Airport (LCA): The proposal does not conflict with LCA's safeguarding criteria however, given the height Hackney Council are required to notify the Civil Aviation Authority on grant of planning permission, and where a building or crane is 100 metres or higher, developers and crane operators are advised to notify the Civil Aviation Authority and Defence Geographic Centre.
51. London Fire Brigade: No observations to make.
52. Metropolitan Police – Designing Out Crime Officer: No objection in principle, recommend a condition and an informative to ensure secured by design guidance is fully carried out.
53. NHS: No objection. The scheme results in a net increase of 40 residential units so the impact on local health infrastructure will not be significant. This is a commercial-led scheme unlikely to generate primary care or acute traffic.
54. Natural England: No objection.
55. Society for the Protection of Ancient Buildings: Object. No assessment of the proposals on the historic Webb Terrace. Acknowledge potential benefits of conserving the terraces but remain concerned the application does not demonstrate a sufficient assessment of the heritage significance of the site as a whole. Also question whether a full range of conservation-led alternatives has been explored.
56. Thames Water: No objection subject to conditions relating to a piling method statement, surface water drainage, foul water capacity, water network upgrades and construction within 5 metres of a water main.
57. Victorian Society:
 - Whilst the Society does not object to modest additions to the South Shoreditch Conservation Area, we strongly object to the extent and some of the massing and scales of the proposed development, in particular the Verso Building. Impacts to the Webb Terraces (listed grade II*) and the conservation area and unlisted buildings 3-21 Curtain Road and 52-52 Scrutton Street.
 - Concerns that the submitted renders do not accurately represent the full scale of the tower and retention of the live-work dynamic of the Webb Terraces.
58. LBH Biodiversity: Subject to the incorporation of the additional recommendations outlined below, the proposals are more likely to be considered acceptable from a biodiversity perspective. Key concerns include the artificial lighting strategy and overshadowing of planted areas. Further recommendations have also been made to improve connectivity between planters, include additional habitat enhancements as identified in the Preliminary Ecological Assessment (PEA), provide a water source, and ensure

a clear approach to biodiversity net gain. Overall, the proposals are expected to deliver a significant enhancement for nature, which is supported, particularly given the site's location within a densely urban setting.

59. LBH Building Control: Objection. A fire statement should have been submitted for each block and a masterplan clearly illustrating the fire brigade tender access route to each block and turning circle within the site. The landscaping must not impede this access.
60. LBH Drainage Engineer: Sustainable drainage, flood risk and groundwater conditions recommended.
61. LBH Employment and Skills: 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.
62. LBH Environmental Protection Officer: Recommend conditions requiring approval of a Construction Statement; requirement for the applicant to enter into a Section 61 agreement with the Council to include specific noise and vibration limit and outline provision for dispensation and variation; residential sound insulation and post-installation testing; kitchen and flue extraction for commercial premises with kitchens; and limits on flue/kitchen plant noise.
63. LBH Pollution Air: No objection. Officers broadly satisfied with measures Conditions recommended to secure Air Quality Positive approach and a requirement to explore alternatives to the proposed diesel generators.
64. LBH Pollution Land: The site is classified as Sites of Potential Concern. Recommend contaminated land conditions requiring a detailed phased contaminated land risk assessment to be undertaken, and investigations into the risks posed by Radon and Unexploded Ordnance.
65. LBH Public Health: No objection, subject to agreement of the detailed submission by the Council's consultees, in respect of the matters raised in the Health Impact Assessment.
66. LBH 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.

- 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.
- 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 affordable workspace 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.
- 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.
67. LBH Streetscene: The Council has a separate public realm scheme in development at the junction of Worship Street and Clifton Street to be delivered using S106 contributions from nearby schemes – works should not conflict with this. The Council is currently working on the Shoreditch Public Realm Framework. Parking stress in the surrounding streets is low. Servicing / unloading should be accommodated within the development where possible. 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.
68. LBH Transportation: Objection to the quantum and quality of cycle parking and suggest further work is required on the location of Blue Badge parking spaces. The Transport Assessment and Delivering and Servicing Strategy need to be bolstered in post-planning work. Otherwise acceptable subject to conditions and S106 Agreement.
69. LBH Tree Preservation Officer:
- There are currently no trees within the redline boundary of the site and five street trees adjacent to the proposal which require pruning to facilitate the proposal. One tree has been classified as dead and will be removed regardless of the proposed development. Proposed measures are acceptable.

- The proposal provides a significant uplift in canopy coverage and the green infrastructure benefits that provides. 47 ground floor trees are proposed and 105 trees for the roof terraces, and further trees are proposed within the S278 public realm works. Appropriate species have been selected for different locations.
 - Conditions recommended requiring compliance with the Tree Protection Plan and approval of a hard and soft landscaping scheme.
70. LBH Waste: The waste strategy 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 25 metre guidance, but the strategy says this is offset by the bin store being on the journey to the exit, and assisted collections being provided if needed). Dragging distance for bins collection by LBH should be within the 10 metres guidance.

Representations made to the Mayor of London

71. The Deputy Mayor took over the planning application for his own determination on 9 March 2026. Letters were sent to neighbours outlining that the Deputy Mayor would be responsible for determining this planning application instead of the Council. The letters advised that if substantial amendments are made to the application, a public consultation would be held.
72. As outlined in this report, there were no substantial amendments made to the application following the decision to call in the application. Therefore, a further public consultation was not considered necessary.
73. At the time of writing, a total of one response was received from Create Streets, outlining support for the scheme and highlighting the report they prepared titled “Will Shoreditch Works make London better?”. The representations summarises how the scheme would restore traditional streets and urban fabric; prioritises human scale and active frontages; coherent and contextual design approach; and creation of place value. The representation also highlights the public support for the scheme.
74. All responses have been made available to the Deputy Mayor and have been taken into account in this report.

Planning issues

75. Having regard to the site and the details of the proposed development, relevant planning policy at the local, regional and national levels; and, the consultation responses and representations received, the principal planning issues raised by the application that the Deputy Mayor must consider are:
- Environmental Impact Assessment;
 - Land use principles;
 - Affordable Workspace

- Housing;
- Urban Design;
- Heritage;
- Amenity impacts;
- Sustainability, environment and climate change;
- Transport;
- Mitigating the impact of development through planning obligations;
- Legal Considerations; and
- Planning balance.

76. These issues are considered in the following sections of this report.

Environmental Impact Assessment

77. The proposal for which planning permission is sought constitutes Environmental Impact Assessment (EIA) development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations). The application is supported by an Environmental Statement (ES) which assesses the likely environmental impacts of the proposed development.
78. The application is supported by an Environmental Statement (ES) (prepared by Trium, dated October 2024) and an ES addendum (Trium, August 2025) which was submitted in response to comments from Hackney Council and statutory consultees.
79. Hackney Council engaged RPS to undertake a review of the applicant's ES documents. Following clarifications and revisions, RPS concluded that although there are some unresolved areas of disagreement between the applicant and consultees and a small number of issues are identified, none of these are issues of elevated risk or deficiency within the ES. RPS ultimately concluded the ES and ES addendum are compliant with the information requirements of Schedule 4 'Information for inclusion in Environmental Statements' of the EIA Regulations and that the documents are suitable for consideration as environmental information for the scheme.
80. At paragraph 6.11.04 of the Committee Report (11 March 2026), Hackney officers set out that where there are issues with the submitted information, the Committee Report considers these in more detail.
81. The ES covers assessment of socio-economics; traffic and transport; air quality; noise and vibration; daylight, sunlight, overshadowing, solar glare, light

pollution and PV panels; wind microclimate; archaeology; and climate change and greenhouse gases.

82. The ES has been reviewed in accordance with EIA Regulations. The 'environmental information' has been examined by the Council and has been taken into consideration by GLA officers to reach a reasoned conclusion of the significant effects of the proposed development. The ES concludes there would be no significant adverse impacts in relation to socio-economics; no significant effects relating to traffic and transport; air quality; and wind microclimate subject to mitigation. In terms of noise and vibration, moderate to major adverse (significant effects) during the demolition, refurbishment and construction works are anticipated; in relation to the daylight, sunlight and overshadowing assessment, negligible to moderate adverse effects have been identified (not significant); and in relation to climate change and greenhouse gases, minor adverse (not significant) impacts are identified. Significant residual effects are identified in relation to archaeology, although it is noted these works would also provide a minor beneficial impact in terms of the opportunity to directly address GLAAS's guidance and improve knowledge of the site. Detailed assessments are set out in the relevant sections of this report. Appropriate mitigation and monitoring measures as proposed in the ES would be secured through planning conditions and/or planning obligations.

Land use principles

83. NPPF NDMP S3 applies a presumption in favour of sustainable development and NDMP S4 states that "Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework".
84. The proposed development does not give rise to any substantial adverse effects in relation to the criteria in NDMP S4(2). The "circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include (but are not restricted to)"; the safeguarding of land or buildings for particular uses; recreational land and facilities; Local Green Space; biodiversity and geodiversity; Protected Landscapes or development within residential curtilages; for the reasons considered throughout this report.
85. The site is located within the CAZ and within the City Fringe Opportunity Area (OA). London Plan Policy SD4 recognises the significant office functions of the CAZ and seeks to preserve and enhance the strategic functions of the CAZ. The City Fringe Opportunity Area Planning Framework (OAPF) identifies the OA to have capacity for over 50,500 new jobs and 15,500 new homes.
86. As set out at Appendix 3 of the Hackney Local Plan (2020), the Hackney Site Allocations Local Plan (SALP) (2016) remains applicable to some sites, including this one (allocation 125). Under the SALP the site forms part of a wider site allocation for employment-led mixed-use with supporting retail, leisure and residential uses. Table 1 of the SALP identifies indicative capacities

for the whole site (see Table below), noting the application site occupies approximately 80% of the site allocation area.

Land use	SALP	2019 draft AAP	2026 draft AAP	Proposed
Office	10,254 sq.m.	25,000 sq.m. GEA	33,800 sq.m.	65,448 sq.m.
Residential	432 units	93 units	215 units	7,425 sq.m.
Retail	825 sq.m.	Up to 3,600 sq.m.	1,150 sq.m.	4,075 sq.m.
Community	500 sq.m.	n/a	n/a	770 sq.m. (Urban Room)
Leisure	750 sq.m.	n/a	n/a	-

Table 2 Indicative and proposed land uses

87. The site is located in the Shoreditch Priority Office Area (POA). Local Plan Policy LP26 sets out the Council's goal to deliver 188,000 sq.m. of new office floorspace by 2033, stating that new employment floorspace will be permitted in designated areas, including POA's within which office-led development will be supported. Policy LP26 further seeks to ensure new developments within the designated employment areas maximise employment floorspace.
88. The site is also allocated in the Future Shoreditch draft AAP (2026) for an employment-led mixed-use development. Policy FS01 of the draft AAP sets out that the draft AAP will support the delivery of around 200,000 sq.m. of office floorspace, creating over 10,500 new jobs, and 15,600 sq.m. of retail, community or active uses, creating over 550 new jobs. Policy FS01 specifies that at least 60% of the floorspace should be office use and states that development will be permitted where it includes a mix of uses (including C3 residential) while still being employment-led, is designed flexibly to accommodate occupation by a range of businesses and incorporates active frontages at ground level.
89. It is noted that Hackney's Committee Report (dated 11/03/2026) considers the previous draft AAP (2019) and affords this limited weight. While the draft site allocation land uses remain broadly consistent, the indicative capacity set out in the 2019 draft have been updated in the 2026 draft (refer to **Table** below). Given the 2026 draft is now at a more advanced stage (Regulation 19, Publication Version), GLA officers will afford it moderate weight.
90. While Hackney's Committee Report is broadly supportive of the scheme in land use terms, the report sets out the Council's view that the site should be delivering significantly more residential accommodation than proposed. The Council's report sets out that in this location smaller sites are typically able to provide a single core therefore residential units are often not proposed, and given the size of the site there is potential for delivery of residential floorspace to deliver the Local Plan's target of 7,000 residential units in Shoreditch. The quantum of housing however is not the subject of a reason for refusal by the

Council. GLA officers note that while both the adopted and the draft site allocations do make provision for a greater quantum of residential development proposed, both allocations along with the site designations prioritise the delivery of employment uses.

91. GLA officers consideration of the main land uses is set out in the following paragraphs.

Office development

92. Hackney Local Plan Policy LP26 identifies the Council's plan to deliver a minimum of 118,000 sq.m. of new office floorspace by 2033. GLA officers note this is a minimum target. Local Plan Policy LP27 requires new office development to be well designed, high quality buildings with flexible floorspace to accommodate a variety of businesses sizes and types. Policy LP27 further specifies that within the Shoreditch POA new development will be permitted where it is employment-led where at least 60% of the floorspace across the area as a whole is B1 employment floorspace (Use Class B1 was revoked on 1 September 2020 and was effectively replaced with new Class E(g)).
93. The proposed office-led redevelopment of the site accords with the strategic and local site allocations. Hackney's Planning Service Authority Monitoring Report FY2023/24 (the most recent) reports that 17,725 sq.m. of office floorspace (Class E(g)(i)) and 65 sq.m. of flexible office and light industrial floorspace (Class E(g)) was delivered over the period 2023/24, with a loss of 341 sq.m. of Class E(g)(i) floorspace. While the monitoring report concludes that this delivery, in combination with 99,300 sq.m. of Class E(g)(i) in the pipeline (i.e. approved but not delivered) would be sufficient to deliver the 118,000 sq.m. minimum target outlined in Local Plan Policy LP26, this relies on the pipeline floorspace actually being delivered. Delivery issues are recognised in paragraph 4.8 of the monitoring report which states that the limited delivery of office floorspace against the significant pipeline of floorspace can be understood to represent, among other factors, a delayed response to rising building costs.
94. The scheme would provide 65,448 sq.m. (GIA) of Class E(g)(i) office floorspace which is 55% of the Local Plan's new office floorspace target, noting that target is a minimum and the site is located in an area that prioritises office and employment floorspace. This would also be 33% of the new office floorspace the draft AAP seeks to support.
95. Further, the applicant has set out that the scheme has the ability to provide circa 6,000 business, research and creative sector jobs which would contribute 11.9% of the jobs identified for the OA. It is noted that the applicant has identified a further 612 jobs and apprenticeships for unemployed residents across construction and end-use phases. GLA officers note that while the Council's Committee report estimates a more conservative provision of circa 4,150 jobs, this would still contribute 8.3% of the jobs identified for the OA and would deliver high quality commercial floorspace above the quantum identified in the draft site allocation. While the Committee Report does not address this

discrepancy and sets out a view that the local need for residential units is more pressing, it does acknowledge that 4,150 jobs are of considerable value.

96. As such, GLA officers consider the proposed office floorspace to be appropriate on this site. The scheme would deliver a significant number of jobs which would contribute towards meeting employment targets for the OA within a CAZ and POA designated site. As such, the proposed office floorspace is acceptable in land use terms in accordance with the adopted and draft site allocations, the CAZ and OA designations, and Local Plan Policies LP26 and LP27.

Affordable workspace policy

97. London Plan Policy E3 requires consideration of the need for affordable workspace where there is affordable workspace on-site currently; in areas where cost pressures could lead to the loss of affordable or low-cost workspace (e.g. the City Fringe and CAZ); and / or in locations identified in a local development plan document, and encourages borough development plans to consider detailed affordable workspace policies in light of local need and viability. In these circumstances, Policy E3 makes provision for planning obligations being used to secure affordable workspace for a specific social, cultural or economic development purpose.
98. Local Plan Policy LP29 requires new major employment developments in designated employment areas and the CAZ to provide affordable or low-cost workspace equating to a minimum of 10% of gross new employment floorspace. LP29 Part C specifies that in the Shoreditch POA at least 10% 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.
99. Policy FS03 of the Future Shoreditch draft AAP requires new employment and mixed-use schemes within the Shoreditch POA to provide 10% of gross new employment floorspace as affordable or low cost workspace on-site in perpetuity, comprising a range of workspace typologies to meet the needs of businesses in Shoreditch.

Affordable workspace proposal

100. The application is supported by an Affordable Workspace Strategy (September 2024) and an Affordable Workspace Strategy (AWS) Addendum Update (September 2025). As set out in the AWS Addendum Update, the applicant is proposing 3,682.6 sq.m. (GIA) or 2,869 sq.m. NIA of affordable workspace as set out in Table 3 below. GLA officers' view on the quantum of proposed affordable workspace is set out below.

Location	Use	Area (GIA)
St James's Place	Affordable office space, artist studios and research space	2,720.6 sq.m.
89 Worship Street	Exhibition space and / or flexible makerspace	126.5 sq.m.
87 Worship Street	Makerspace	21.2 sq.m.
Verso Building	Urban room – multi-function cultural, business and community space	814.3 sq.m.
Total	-	3,682.6 sq.m.

Table 3 Affordable workspace

LBH position

101. Paragraph 6.1.22 of the Committee report states *“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.”*. The subsequent paragraphs detail the Council's reasoning for considering the proposals to comprise 6.6% affordable workspace rather than the 10% figure the applicant states in the submission documents.
102. The Council's position is that there is existing 'low cost workspace' on the application site; however this is not secured as such and is subject to the market. Furthermore, the supporting text to Local Plan Policy LP29 states at paragraph 8.17 *“Any major proposal in the designated employment areas, the CAZ and town centres which involves the redevelopment of existing low cost floorspace must re-provide the maximum economically feasible quantity of low cost floorspace as part of the scheme”*. This ties back to the policy requirement to deliver the maximum viable level of affordable workspace.
103. The Council reviewed the applicant's Financial Viability Assessment (FVA). Paragraph's 6.1.34, 6.1.35 and 6.1.36 of the Committee report set out the Council's conclusion that the scheme would achieve a small surplus (£348,945) above the allowed profit margin. The paragraphs go on to state *“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. For these reasons, the viability of the scheme is not considered to justify the level of Affordable Workspace”*.

Affordable workspace viability

104. GLA officers note that the London Plan does not require viability testing for commercial / office schemes. Therefore, officers did not viability test the scheme at Stage 1 or Stage 2. However, since becoming the Local Planning Authority for the purpose of determining these planning applications and because affordable workspace is one of the Council's reasons for refusal, for robustness GLA officers have now scrutinised the applicant's FVA.
105. Initially, GLA officers also identified a surplus of £348,945. In response, the applicant identified £1.65 million of S106 costs that were not accounted for and modelled in their FVA, as well as circa £750,000 build cost inflation (based on current BCIS costs) since the FVA was initially undertaken (using BCIS UQ October 2024 figures). It is also noted that GLA officers have secured a 20% discount on the Urban Room rent and slots for free community use, which were not accounted for in the FVA.
106. GLA officers recognise the additional costs exceed the surplus initially identified. GLA officers have not requested an updated FVA from the applicant because it is very clear the small surplus initially identified by both the Council and GLA officers would be superseded by the additional costs. While GLA Officers have excluded the Urban Room from the Affordable Workspace provision (see the "Urban Room" section below), the Urban Room discount secured does make it a form of discounted community space which would further impact the viability of the scheme. GLA officers therefore accept the scheme would no longer produce a surplus and would be in a deficit, meaning that the scheme is providing the maximum viable amount of affordable workspace.
107. Further to the viability considerations set out above, Hackney's Planning Service Authority Monitoring Report (AMR)FY2023/24 reports 1,789 sq.m. of affordable workspace was delivered in FY2023/24, with a further 560 sq.m. secured via planning permission in the same period (GLA officers note the area measurement is not specified in the AMR to be either GIA or NIA). Regardless of GEA or NIA, the proposed development would deliver 2,868 sq.m. GEA or 2,248 sq.m. NIA of affordable workspace, which would exceed the delivered and approved affordable workspace for the FY2023/24 year combined. Even where the Council is of the view the affordable workspace offer falls below the policy threshold of 10%, the scheme would deliver a significant quantum of affordable workspace for the borough.
108. GLA officers have secured 2,248 sq.m. NIA of affordable workspace (in accordance with the proposed plans and, this equates to 2,868 GIA) in the draft S106 Agreement. The affordable workspace would provide for a variety of occupiers including research and office space; artist/maker studios; community, event and exhibition spaces; and office floorspace (including co-working space). GLA officers have secured these uses in the draft S106 Agreement, as well as any use requiring subsidy which performs a public or community event as may be agreed between the owner and the Council.

Proposed affordable rent approach

109. Where the affordable workspace deviates from the Local Plan is the aggregate approach to affordable rents, where the applicant proposes to provide different levels of discount to future occupiers, dependent on need. As such, the draft S106 Agreement secures a total aggregate discount of 60% across all affordable workspace, with a minimum of 20% up to a maximum of 60% discount on the standard affordable office and co-working floorspace; and a minimum 60% discount, up to a maximum discount of 95% for the other affordable typologies including research; artist/maker studios; community, event and exhibition space; and other uses performing a public or community benefit (as defined and secured in the draft S106 Agreement). While GLA officers note this would deviate from the policy definition of affordable workspace, officers have sought to take a pragmatic approach to the proposals. Notwithstanding, GLA officers have ensured this is tightly secured, including securing annual monitoring to the Council to ensure the aggregate discount approach is being applied properly and the rent paid across all affordable workspace does not exceed 60% to remain aligned with the policy intention. The affordable workspace has been secured in perpetuity.

Affordable workspace conclusion

110. GLA officers are satisfied that the scheme would deliver the maximum viable amount of affordable workspace in accordance with Local Plan Policy LP29 (Part C(i)) and London Plan Policy E3. Furthermore, the scheme would deliver affordable workspace that would make a significant contribution towards meeting the targets set out in the Local Plan and the draft AAP, as well as meeting the aims of the CAZ and OA designations. The affordable workspace has been appropriately secured and is therefore acceptable in land use terms.

Urban Room

111. The scheme includes a space referred to as the “Urban Room” which the applicant describes in their affordable workspace strategy as “a central networking, education, event and business space for residents, enterprises and community stakeholders”. The applicant intends for this to be a fully programmed space with events, as well as being a space for people to meet day-to-day.
112. When the application was submitted, this space was put forward as part of the affordable workspace offer. The Local Plan defines affordable workspace as follows: “New-build employment floorspace, providing affordable space for small businesses, predominantly within the B1 use class, to occupy, often operated and managed by a workspace provider”. Whilst the Urban Room could incorporate activities akin to workspace, it would be a Sui Generis use that could include other activities such as cultural activities, well-being and public events. As such the Urban Room would not meet the Local Plan definition.

113. Notwithstanding the above, GLA officers have negotiated with the applicant to secure a 20% discount on the Urban Room rent. While this does not meet the definition of “affordable workspace” in accordance with the Local Plan, this is considered discounted space and is considered a benefit. Further to this, GLA officers have secured free community use of the Urban Room (or parts thereof as specified) as follows:
- a) 100% of the space to be available for 15 full days or 30 half days per year;
 - b) 50% of the space to be available for 15 full days or 30 half days per year; and
 - c) 25% of the space to be available for 100 half days per year.
114. It's noted that Paragraph 6.1.24 of the Council's Committee report states that the Council's Regeneration team did not object to the principle of designating the Urban Room as affordable workspace, but questioned whether the proposed programming within the submission documents could properly be considered to perform this function, and note that “as sui generis space, its use would need to be tightly defined within in planning permission”. While GLA officers are not counting the Urban Room as part of the affordable workspace offer within the Local Plan definition, officers have ensured the Urban Room is appropriately and clearly defined within the S106 Agreement, including specifying the activities permitted to take place and securing an Urban Room delivery strategy (detailing how the space would be delivered including layouts, facilities and fit-out details) and an Urban Room Management Strategy (detailing how the space will be managed including management responsibilities, opening hours, booking systems and programme of events).
115. GLA officers have also secured an “Urban Room Remedial Action Plan” via the draft S106 Agreement, to ensure the Urban Room is not used other than as intended and, if it is, details are to be submitted to the Council setting out how this would be rectified including updating the management strategy; reduction of Urban Room fees; increasing the free community use slots, provision of free community events, changes to the configuration and layout of the urban room, and / or ongoing monitoring.
116. As such, the proposed Urban Room could provide a significant benefit to the local community and organisations within this City Fringe OA and CAZ location. Officers consider the Urban Room has been secured appropriately and therefore support the proposed Urban Room in land use terms.

Retail

117. The scheme includes up to 4,075 sq.m. GIA of flexible Class E retail floorspace (inclusive of plant and amenity). The proposed retail floorspace would provide employment opportunities and services and amenities for future occupiers and existing local residents. It would also introduce ground floor active frontages in accordance with London Plan Policy E9.
118. The scheme would deliver 26% of the retail floorspace Policy FS01 of the draft AAP seeks to support (i.e. 15,600 sq.m.) which is considered an appropriate

contribution in the context of the application site. As such, the proposed non-residential uses are acceptable in land use terms.

Residential development

119. The proposed development would provide 78 residential units, being an uplift of 40 units or 5,090 sq.m. GIA of floorspace, on a well-connected site within the City Fringe OA and the CAZ. The provision of residential accommodation is envisaged by the adopted and draft site allocations. While the scheme would deliver a lower quantum of housing than the site allocations envisage, the site allocations clearly prioritise the delivery of employment floorspace in the POA and GLA officers consider the mix of uses to be appropriately balanced in line with Local Plan Policy LP27.
120. The proposed residential units would make a contribution towards meeting Hackney's housing targets as set out at London Plan Policy H1, as well as the housing targets of the OA and the draft AAP. As such, the proposed residential units are supported in land use terms.

Land use conclusion

121. The proposed development would be acceptable in land use terms and would be in line with Local and London Plan policies, as well as the CAZ, OA and draft APP designations, subject to appropriate conditions and obligations.

Housing

122. The NPPF sets out the Government's approach to the delivery of new housing, including a requirement for housing of different sizes, types and tenures to meet the needs of different groups. NDMP HO7 states that "substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence".
123. The Housing Delivery Test (HDT) measures net homes delivered in a local authority area against the homes required. The 2025 (most recent) HDT measurement for Hackney is 52%, evidencing the unmet housing need in the borough.
124. London Plan Good Growth Objective GG4 seeks to ensure housing delivery. London Plan Policy H1 sets a 10 year target for net housing completions of 13,280 homes in the London Borough of Hackney. London Plan Policy SD1 and the OAPF identify a capacity of 15,500 new homes in the OA.
125. Local Plan Policy LP12 states that although the Council will seek to meet the identified housing need of 1,750 new homes per year, the Council will plan to deliver at least 1,330 homes each year, with 7,000 homes over the plan period (to 2033) to be delivered in and around Shoreditch. The Future Shoreditch draft AAP updates these figures, stating that 1,750 homes need to be built each year

between now and 2033 to meet the Council's housing need, and that the cost of private housing and renting in the AAP area has become unaffordable for many people on lower and medium incomes. Policy FS04 specifies that new development within the AAP area will deliver around 500 new homes and maximise affordable housing, with on-site delivery of affordable housing being a priority for schemes of ten or more C3 residential units.

126. It is noted there are 38 existing residential units on site, comprising 2,385 sq.m. of floorspace. 23 of these are in and to the rear of the existing Philip Webb Terrace on Worship Street, with the remaining units in terraced dwellings on Holywell Row and Scrutton Street. It is noted these units do not benefit from green space or amenity space. Of the existing units, there are 25 one bedroom; 6 two bedroom; and 7 three bedroom units, totalling 98 habitable rooms.

Housing	Units	Habitable rooms	Floorspace (GIA)
Existing	38	98	2,335 sq.m.
Proposed	78*	207	7,425 sq.m.
Difference	+40*	+114	+5,090 sq.m.

Table 4 Existing and proposed housing *including 1 retained residential unit which is being refurbished at 105 Worship Street (3B5P)

127. The proposed development would provide 78 residential units, being an uplift of 40 units or 5,090 sq.m. of floorspace. In line with London Plan Policy H8, the scheme would not result in the [net] loss of existing housing. Furthermore, the uplift in homes will make a contribution towards meeting the housing targets for the OA and the Council.

Affordable housing

128. The NPPF (NDMP HO8) states that “development proposals should meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures relevant to the location, including the minimum proportion of Social Rent”. Affordable housing should be provided on site unless an off-site or payment in lieu would deliver a better outcome.
129. London Plan Policy H5 and H6 requires 35-50% of residential units on site to be affordable with a tenure split of 40% intermediate homes and 60% social housing. If the scheme does not deliver 35% affordable housing at the aforementioned tenure split, the scheme would not be eligible to follow the Fast Track Route.
130. Local Plan Policy LP13 seeks a minimum of 50% on-site affordable housing in scheme of ten or more units, to comprise 60% social rent and 40% intermediate. As the scheme provides less than 50% affordable housing, the Council viability tested the scheme.

131. The scheme proposes 35% affordable housing by habitable room (and by unit, although this is not the measure used by the London Plan), comprising 62% social rent and 38% intermediate, as set out in Table below. 87 and 89 Worship Street would wholly comprise social rent units (11 units). Holywell Mansions would provide two social rent maisonette units, and 11 intermediate units. The Webb Terraces (91-105 Worship Street) would provide three social rent units; one each on the first, second and third floors as shown in Table 6 below.

Tenure	Units	%	Habitable Rooms	%
Social Rent	16	21%	45	22%
Intermediate sale	11	14%	28	13%
Private	50	65%	135	65%
Total	77	100%	208	100%

Table 5 Affordable housing

Tenure	Size	87-89 Worship Street	91-105 Worship Street	Webb Mews	24-26 Holywell Row	Holywell Mansions
Market	Studio	0	3	0	2	0
	1 bed	0	0	0	2	18
	2 bed	0	0	6	1	13
	3 bed	0	1*	0	0	0
	4 bed	0	5	0	0	0
	Total	0	9	6	5	31
Social Rent	Studio	2	3	0	0	1
	1 bed	3	0	0	0	1
	2 bed	5	0	0	0	0
	3 bed	1	0	0	0	0
	4 bed	0	0	0	0	0
	Total	11	3	0	0	2
Intermediate	Studio	0	0	0	0	0
	1 bed	0	0	0	0	5
	2 bed	0	0	0	0	6
	3 bed	0	0	0	0	0
	4 bed	0	0	0	0	0
	Total	0	0	0	0	11
Total	Studio	2	6	0	2	1
	1 bed	3	0	0	2	24
	2 bed	5	0	6	1	19
	3 bed	1	1	0	0	0
	4 bed	0	5	0	0	0
	Total	11	12	6	5	44
		78				

Table 6 Proposed unit mix and totals by building, noting that while the studios have separate bedrooms, the floor areas would be for 1b1p units *including 1 retained residential unit which is being refurbished at 105 Worship Street (3B5P)

132. The scheme proposes 35% affordable housing with a tenure split within a reasonable margin (noting the margin sways in favour of social rent), therefore GLA officers consider this a Fast Track Route compliant scheme in line with London Plan Policy H5 and H6.
133. Notwithstanding the above, Hackney's Local Plan sets a higher threshold level of 50% affordable housing and the Council subsequently viability tested the scheme. While GLA officers note that the London Plan was published more recently than Hackney's Local Plan, because the Council officers recommended reasons for refusal include under-provision of affordable workspace, GLA officers have viability tested the scheme for robustness (note: although the reason for refusal does not cite affordable housing, the viability of the scheme must be considered as a whole). It is noted that while the above housing section refers to a total of 78 units being provided, one of these units is being retained. As such, for the purposes of affordable housing and viability testing, this unit has been excluded from the viability calculations.
134. GLA viability officers have reviewed the viability and conclude the scheme as a whole (considering affordable housing and affordable workspace) would achieve a small surplus. However, the applicant has since identified additional S106 contributions and build cost inflation (BCIS October 2024 figures vs. current day figures) since their original financial viability assessment, the totals of which would far exceed the small surplus identified. As such, GLA officers are satisfied that the scheme is providing the maximum viable amount of affordable housing.
135. Affordability levels and an early-stage review have been secured in the S106 agreement. Because GLA officers consider the scheme is eligible to follow the Fast Track Route in accordance with the London Plan, GLA officers do not consider mid or late-stage reviews are required in this instance.
136. As such, the proposed affordable housing provision is considered to be acceptable and satisfies the requirements of the NPPF and London Plan Policies H4 and H5, and Local Plan Policy LP13.

Unit mix

137. London Plan Policy H10 states that schemes should generally consist of a range of unit sizes having regard to several considerations including the local need, the nature of the scheme and the site location.
138. Local Plan Policy LP14 sets out the Council's prescribed unit mix by tenure as set out in Table below. Part C of Policy LP14 states that the Council will consider variations if this can be justified.

	1 bed	2 bed	3+ beds
Social / London affordable rent	30-34%	30-34%	33-36%
Intermediate	Lower % than 2 bed	Higher % than 1 bed	15-25%
Market	Lower % than 2 bed	Higher % than 1 bed	33%

Table 7 Hackney Local Plan preferred tenure mix

139. The proposed housing mix is set out in

140. Size	Market	Social Rent	Intermediate	Total (No.)	Total (%)
Studio	5	6	0	11	14.1
1 bed	20	4	5	29	37.2
2 bed	20	5	6	31	39.7
3 bed	1*	1	0	2	2.6
4 bed	5	0	0	5	6.4
Total	51	16	11	78	100

141. Table below (shown in detail by building in Table 6 above).

Size	Market	Social Rent	Intermediate	Total (No.)	Total (%)
Studio	5	6	0	11	14.1
1 bed	20	4	5	29	37.2
2 bed	20	5	6	31	39.7
3 bed	1*	1	0	2	2.6
4 bed	5	0	0	5	6.4
Total	51	16	11	78	100

Table 8 Proposed unit mix *including 1 retained residential unit which is being refurbished at 105 Worship Street (3B5P)

142. The proposed dwelling mix does not comply with the Local Plan policy. The Committee report sets out the Council officers view that the skew towards smaller dwellings would impact the level of public benefit achieved by the housing and affordable housing delivery since it does not respond to the established need for family sized units. Council officers did not however recommend refusal on housing mix.

143. GLA officers acknowledge the limitations of the refurbished elements and note the City Fringe location of the site. GLA officers have also viability tested the scheme and conclude the scheme as proposed is in deficit. It is considered that, while a greater proportion of larger family sized units to comply with Policy LP14 and address the identified local need would be preferred, the proposed unit mix is acceptable on balance.

Quality of residential accommodation

144. London Plan Policy D6 requires the provision of well-designed and high quality housing by setting minimum requirements for internal floorspace and outdoor

amenity space, and requiring developers to consider accessibility, daylight and sunlight, and maximisation of dual aspect units.

145. Local Plan Policy LP17 sets out the Council's expectation for homes to be of high quality design and meet internal and external space and accessibility standards.
146. The scheme would provide 78 residential units, comprising a mix of new build and refurbished dwellings, which would meet the minimum internal floor area and floor to ceiling height requirements set out in the London Plan. London Plan private amenity space standards would also be met.
147. The residential development is high quality. The re-use of existing buildings has meant some constraints to the design, however, within the context of the residential provision including re-use of existing buildings with constraints on façade changes, the designs are supported. Dual aspect homes have been provided wherever achievable to mitigate impact of the close proximities that the site layout generates, by providing a second orientation. GLA Officers support the clear distinction between public and residents-only outdoor space.
148. The application is supported by a daylight and sunlight assessment which concludes 52.7% of habitable rooms across the development would achieve the levels of daylight recommended by BRE. The Committee report notes that in the context of the Council concluding that the townscape impacts are not acceptable, Council officers do not support the daylight and sunlight levels achieved by proposed residential units. GLA officers note that while the site itself is in a Conservation Area (CA) characterised by 3-6 storey buildings, the buildings outside the CA to the south and east are significantly taller. Combined with the tight urban grain characteristic of the local area, and the fact that three of the residential buildings are existing with retained facades, GLA officers acknowledge the limitations of the site and consider the internal daylight levels to be acceptable on balance.

Agent of Change

149. London Plan Policy D13 sets out the Agent of Change principle which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. The ES includes a noise and vibration assessment which assesses impacts during both demolition and operation, assessing both the impacts of the proposed development on neighbouring receptors, and impacts on future occupiers of the proposed development. The noise and vibration assessment acknowledges there is an Agent of Change consideration in relation to the proposed new residential units at 103 Worship Street and the Webb Mews and their proximity to the existing Queen of Hoxton public house. The assessment considers that, where the noise levels from the Queen of Hoxton remain at their current levels as assessed, impacts would be acceptable subject to installation of noise insulation in the new wall construction to the Webb Mews and the proposed new external wall to the rear of 103 Worship Street. The noise and

vibration assessment also identifies potential noise transfer from the Queen of Hoxton to 105 Worship Street. However, because this building is currently in residential use, there would be no change of use and therefore the Agent of Change principle doesn't apply. The report also notes that enhancement of the existing party walls are not feasible due to heritage restrictions. Notwithstanding this, conditions have been secured to ensure an acceptable level of amenity for future occupiers of all proposed residential units.

Children's play space

150. London Plan Policy S4 requires residential developments to include at least 10 sq.m. of good-quality and accessible play space for children of all ages. Hackney Local Plan Policy LP50 requires the same quantum of play space.
151. Table 9 below sets out the applicant's calculations for play space requirements and the proposed quantum. The applicant's planning statement states that due to site constraints, the play space for 11+ year olds would be accommodated off-site.

Age group	Required	Proposed (on-site)
0-4 years	94 sq.m.	101 sq.m.
5-11 years	67 sq.m.	71 sq.m.
11+	33 sq.m.	0
Total	196 sq.m.	172 sq.m.

Table 9 Children's play space

152. The Council's Committee report states that 58 sq.m. of play space would be provided to the west of Holywell Mansions, and that the gated landscaped areas in front of the Webb and Morris Mews (332 sq.m. and 209 sq.m. respectively) could be considered suitable doorstep play for very young children. The Council concludes that, on balance, the quantum of play space is acceptable. The Council does not consider a contribution is required towards any off-site play provision. GLA officers consider the proposed play space to be acceptable. The CIL contribution from this development could be used to deliver 11+ play space. A condition for an open space and amenity space strategy to ensure access arrangements to the play space is equitable for all housing tenure types, as well as securing security and management arrangements.

Urban design

153. The NPPF (NDMP DP3) states that "Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and

architectural features, and the restoration, reuse and integration of heritage assets. This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified in accordance with policies L2 and L3.”

154. NDMP DP3 goes on to set out seven key design principles; Liveability, Climate, Nature, Movement, Built Form, Public Space and Identity. NDMP DP4 encourages the appropriate use of design review panels and promotes measures to secure the quality of the delivered development.
155. In achieving the Mayor’s vision and objectives relating to neighbourhoods and architecture, chapter 3 of the London Plan sets out a series of policies about the places and spaces in which Londoners live, work and visit. London Plan Policy D4 sets the overarching design principles for development in London. Other relevant design policies in this chapter include specific design requirements relating to: optimising site capacity (Policy D3); inclusive design (Policy D5); public realm (Policy D8); tall buildings (Policy D9); designing out crime (Policy D11); and fire safety (Policies D5 and D12).
156. Hackney Local Plan Policy LP1 requires development to respond to local character and context; be compatible with existing townscape and views and improve the public realm. Policy LP1 also sets out requirements relating tall buildings, stating that development documents such as AAP’s will provide a building heights strategy for each place and identify appropriate tall building sites and locations. Policy LP2 requires development design to ensure there are no significant adverse impacts on the amenity of both occupiers and neighbours.
157. Policy FS09 of the Future Shoreditch draft AAP defines tall buildings in Shoreditch as any building which is 30 metres or more in height. The draft AAP specifies locations where tall buildings may be appropriate and requirements for the design of tall buildings. While the application site is adjacent to a tall building zone to the east and south, the site itself is not within the identified tall building zone.

Development layout, public realm and landscaping

158. The site is located within the City Fringe OA and the South Shoreditch Conservation Area. As set out above, the proposal is for redevelopment of the currently under-developed site to provide an optimised intensification of uses through a mix of retained and new buildings along a network of public routes, and to provide a central public courtyard: Rose Yard. Most of the existing buildings on site are in office use, however there are also 38 homes on the site. The site is currently a closed urban block lacking permeability and only accessible by those who occupy the buildings. Street level activity generated by ground floor uses around the site’s perimeter varies in the existing scenario.
159. The proposed layout of the site is well considered with the central space located where it will receive most favourable environmental conditions within the context of the site’s redevelopment. There are multiple public routes into the heart of the site to ensure the development is permeable and readily accessible

from many directions. The layout is supported by detailed movement analysis by consultants Space Syntax to identify how the proposed changes from the existing situation will transform the site itself and improve connectivity in the wider area. Public access to the central open-air courtyard would be 24/7. This is welcomed.

160. The provision of active uses at ground floor level to all perimeter buildings within the site, including some street level outward facing uses contributes to the successful integration of the proposals with the surroundings. Day into evening uses will be important to ensure the public space being created is overlooked, safe, inclusive and welcoming for all.
161. Appropriate conditions have been secured to ensure detailed design finish materials and landscaping support visual integration with existing public realm beyond the red line boundary.
162. The site layout includes multiple entrances to the various buildings, creating welcome activity to surrounding streets at the site's perimeter, and within the new routes and spaces within the site created by the redevelopment. Cycle store entrances are also located in active, overlooked locations, which would help facilitate their use.
163. Other than the route in from Scrutton Street adjacent to the proposed Mason building, the routes into the site are provided as undercroft passages. The design of these has been through a number of iterations in the design development to ensure they are legible as entrance routes and detailed to be as inclusive and inviting as possible. The extent of the build-over of the Rose Walk route from Curtain Road has been reconsidered and reduced and most of its length is now open to sky. The remaining undercroft part of the route is flanked by active uses, and where back-of-house uses are necessary flanking the open-to-sky element of the route, public art is proposed to enliven this facade. This route is aligned with an existing route on the opposite side of Commercial Road to promote onward connectivity beyond the site.
164. St James Passage is a longer undercroft route, however the soffit height of 5.9m should help stop the space feeling oppressive or intimidating and the route is flanked by active uses including entrances and extensive glazing along both sides and includes indicative proposals for public art to enliven the route further. This route is aligned with a route into the public plaza, The Stage, on the opposite side of Curtain Road, facilitating connectivity between the two public spaces.
165. The open-to-sky public route into the site from Scrutton Street adjacent to the Mason building from the north is clear and legible, and the brightly coloured finish of the Mason building adds to the attractiveness of this route.
166. The passage at the south of the site to Worship Street, Carman passage, is an undercroft, with the retention of existing buildings along the Worship Street boundary and their incorporation into the scheme making an open-to-sky route unachievable.

167. Clear visual signalling through public art, building façade enhancements, public realm surface treatments, and appropriate lighting have been secured by condition.
168. The proposed public space, Rose Yard, sits adjacent to the west side of the Verso building and the proposals include additional public space in the form of a new internal event space at the base of the Verso building. The façade design at ground floor level allows the internal space to open up completely to Rose Yard providing a large gathering space with a barrier free transition from inside to outside. The submitted images of Rose Yard and the Urban Room in the ‘fully open’ and ‘closed’ conditions demonstrate that the spaces are capable of working effectively as attractive gathering spaces in both scenarios. The intention is that the space - the ‘Urban Room’ – will support the new development’s aim of becoming a destination, and as well as providing food and beverage and relaxation for nearby workers, will hold exhibitions, evening events and weekend markets. The applicant intends to curate the activation of the urban room to ensure it contributes fully to the new community the development will bring as well as the wider neighbourhood. The urban room proposal is an important part of the public space delivery within the site. The success of this as a well programmed inviting place that includes non-transactional activities, and its continued stewardship, is key to this. Delivery of this element is therefore important, and would be delivered as part of the Phase 1 works. The Phasing Plan is secured in the draft S106 Agreement which will ensure the delivery of the public open space and the Urban Room upfront

Tall buildings, scale, form and massing

169. The proposal includes buildings up to 100 metres AOD in height. This constitutes a tall building according to the borough’s local definition. While the SALP specifies that taller elements may be appropriate subject to the approach in relation to listed buildings and the conservation area, the site is not identified in the local plan or draft AAP as a site which is suitable for tall buildings. Accordingly, the proposals do not strictly accord with the locational requirements of London Plan Policy D9 (Part B). Notwithstanding, tall buildings at this site are capable of being acceptable given the location and site-specific circumstances. Assessment of the visual, functional, environmental and cumulative impact of the proposals have been submitted in line with London Plan Policy D9 (Part C).

Visual impact

170. The tallest building proposed is the Verso building which has a large building footprint, setting it apart from the existing scale and urban grain of the Conservation Area, and resulting in a large building mass. At submission the building form had many facade setbacks as the height increased, resulting in a complex form. Since the application was first submitted the applicant has worked through iterative changes to the Verso building, in response to feedback given at Stage 1 and following the Council’s initial consultation period. GLA officers previously highlighted that the multiple different facade planes and proportions of the building, along with the varied solid/opening proportions within each façade plane combined to give an overly complex appearance

which may have been exacerbating the visual dominance of the building in mid-range views. The revised Verso building has a simplified and slightly more slender massing. The omission of the proposed oversailing elements over 13-19 Curtain Road means the form of the Verso building is not as disruptive to the established form and datum on Curtain Road and provides a less prominent form at the Conservation Area edge. The revised form is still capable of delivering a desirable variety of office floorplate sizes. The height of the tallest element of the Verso building has also been reduced from 104 metres AOD to 100 metres AOD. Although minor in scale, this supplements the townscape improvements of the massing changes.

171. Acknowledging the positive changes, the Verso building remains a significant change in scale from that of the immediate context within the conservation area. This is most visible in mid and long-range views, for example V17 looking south along Phipp Street; V2.3 looking along Curtain Road; and V7.2 looking toward Curtain Road from Worship Street and Appold Street corner.
172. The proposed St James House building partially oversails the retained existing building at 52-56 Scrutton Street. During the application process this element of the design has undergone changes to reduce the impact of the new over the existing. The introduction of 2 additional setbacks for the oversailing floors has assisted in reducing the impact from street level. Elsewhere the top two floors of St James House have been set back from the main frontage to reduce its impact in views. This is effective in the immediate street scene where the narrowness of the streets means the top floors are not dominant. When viewing St James House from the junction of Curtain Road and Great Eastern Street the larger scale of the roads and junction means long views are possible, and the top storeys are clearly visible. The neutral colour of the proposed finish may help to mitigate the visual impact of this. The appearance of the ground storey of St James House has also been amended and a darker tone brick contrasting with the main body of the building is proposed. This does effectively reduce the scale of the elevations in mid-range views.
173. The massing of Holywell Mansions is of larger scale and height than the more typical finer grain of the Shoreditch conservation area. The visual impact of this has been mitigated by introducing multiple steps in the massing, and the upper parts of the building that are taller than the established local datum are not visible from the narrow streets that form the immediate context.
174. The scale and form of the mews buildings within the site are appropriate to their location within the masterplan and the wider conservation area context. Where close proximities could potentially impact on privacy, recesses have been introduced to the building form to improve this where possible, and careful window and balcony positioning provides further mitigation.

Functional impact

175. In terms of functional impacts, as set out in sections of this report with corresponding headings, appropriate mitigation and/or details at reserved matters stage has been secured regarding fire safety, aviation and Secured By Design. Transport impacts are mitigated through s106 obligations and

appropriate transport and access management plans have been secured as detailed in the “transport” section of this report.

Environmental impact

176. The application is supported by an Environmental Statement, including assessment of wind, daylight, sunlight and overshadowing impacts, including addendum update reports following scheme amendments requested by the Council. The following paragraphs set out the GLA’s assessment of these.

- *Wind microclimate*

177. The applicant’s wind report indicates that with mitigation measures incorporated, the environment around the site would remain broadly as currently experienced; and within the proposed development the public courtyard would experience conditions suitable for standing or occasional sitting, and some residential balconies would experience “occasional sitting” conditions. Since calling-in the application, GLA officers queried whether this would compromise their functionality. In response, the applicant submitted a technical note providing further explanation of the previous assessments. The note does not introduce new information and is not considered to be new environmental information under the EIA Regulations. It is however published alongside this report for completeness.

178. The note explains that the wind assessment for the project has been undertaken using the City of London variant (more stringent version) of the Lawson Comfort Criteria, which the applicant verbally advised GLA officers was requested by the Council. This method of assessment is for pedestrian comfort and safety, with public realm examples given to illustrate the categories e.g. Frequent Sitting: ≤ 2.5 m/s (cafés, outdoor restaurants) and Occasional Sitting: ≤ 4 m/s (benches, parks).

179. The category ‘frequent sitting’ is therefore very onerous as it is aimed at being able to dine outside in very calm conditions, which the applicant’s note describes as “quasi-indoor” conditions e.g. in case of napkins being disturbed. The note further sets out the “occasional sitting” category covers any other seating areas and is therefore considered a suitable target for balconies. GLA officers concur with this view.

180. The wind report concludes that all areas public spaces and amenity areas across the proposals are appropriate for their purpose. Following the clarification above, the wind conditions described in the assessment are considered acceptable.

- *Overshadowing impacts to surrounding amenity areas*

181. The application is supported by an Environmental Statement, which includes a daylight, sunlight and overshadowing assessment and a subsequent addendum report in response to the scheme amendments. Since the application was called-in, the applicant has also submitted a daylight, sunlight and overshadowing technical note that provides further explanation of the previous assessments. The note does not introduce new information and is not considered to be new environmental information under the EIA Regulations. It is however published alongside this report for completeness.
182. The applicant's assessment concludes that the principal sensitive amenity areas identified as part of the scoping process experience no significant effects in accordance with the BRE Guidelines. The spring equinox (March 21) has been taken as the appropriate benchmark for this assessment, in accordance with BRE guidelines.
183. A transient overshadowing assessment is also included in the report to illustrate impact on surrounding external amenity spaces, including The Stage, a public plaza immediately to the east of the site. This indicates that in the midsummer solstice (June 21), between 16.00-19.00hrs the Verso building overshadows The Stage. At 16.00hrs the reduction is partial; and from 17.00hrs onwards the impact increases with no sun reaching the ground in The Stage. It is noted that on March 21, the appropriate benchmark in accordance with BRE guidelines, The Stage appears fully overshadowed however, this occurs in the existing situation, the proposed development is not the cause. Paragraph 6.6.24 of the Committee report concludes The Stage is already so overshadowed by existing development that, even on the solstice, it would be unreasonable to refuse the application on the basis of additional overshadowing. GLA officers agree with this conclusion.
- *Impact of the proposals on the daylight of existing residential neighbours*
184. Although the majority of the surrounding buildings are commercial use, there are a number of residential buildings along Curtain Road and Holywell Row. A daylight study has been submitted to assess the impact of the proposals in terms of loss of daylight to these homes. The report concludes that 17 out of the 37 residential neighbours would experience an impact on their daylight that is more than negligible under BRE guidelines, and 8 of these will experience impact that is considered Significant in ES terms. The applicant's assessment (ES Volume 1, Chapter 10) states that the site as existing is underdeveloped and that proposed development to match the scale and proportions of the evolving neighbourhood would mean that a noticeable change is inevitable. Curtain Road properties immediately to the east of the Verso building are the most impacted, with retained daylight levels to affected windows falling to single figures.
185. The applicant's assessment states that the placement of the Verso building was a design response that considered a whole range of factors including working with existing heritage buildings and retained structures; impact on CA views; and limiting daylight and sunlight impact on as many receptors as possible. The applicant's assessment confirms that the negative impacts on neighbours have

been reduced where feasible and states that the residual impacts are considered acceptable in the context of the surrounding urban environment, the optimisation of the site in accordance with planning policy, and the wider heritage, townscape and regeneration benefits delivered by the proposed scheme.

- *Sunlight hours assessment to amenity within the site*

186. Owing to the built-up nature of the environment, the levels of sunlight at ground floor level on the equinox are lower than recommended by the BRE. The new public space Rose Yard has been located in the area with the greatest sunlight access, however 36% of the space receives two or more hours of sunlight on the equinox, which is below the 50% BRE target. The report notes that 11 days later, the BRE target is met, and that the main public space is supplemented by several terraces, which generally provide excellent sunlight access throughout the year. The assessments undertaken for the summer solstice reveal that large parts of the amenity areas will receive over six hours of sunlight during the peak summer months, when outdoor spaces are most utilised. The applicant's consultant confirmed that it is not anticipated that the changes in the massing of the Verso Building will change the sun-hours-on-ground results for the central public space. Overall the level of sunlight achievable by public amenity spaces within the development are considered acceptable.

- *Internal daylight to proposed residential accommodation*

187. Internal daylight levels achieved varies across the 5 proposed residential buildings. The internal daylight assessment indicates that approximately 56% of proposed homes overall meet the BRE recommended levels. There are 3 retained buildings providing residential accommodation and the opportunities for size and placement of windows to optimise daylight is constrained by their existing positions. The applicant has sought to optimise daylight to the internal layouts of these by designing the internal layouts so the main living spaces are located to receive the best daylight available. This is a logical approach.
188. The rest of the residential accommodation is provided in two new purpose built buildings which are not subject to the same constraints. The internal daylight levels achieved reflects this with a range of 69-79% of these homes performing in line with BRE guidelines.
189. Recognising the constraints in relation to the reuse of existing buildings of townscape merit within the conservation area, when considered as a whole, the internal daylight received by the residential element of the proposals is considered acceptable.

- *Solar Glare*

190. The ES includes an assessment of solar glare which concludes these impacts would be negligible or minor adverse (not significant). While some limited impacts are identified for drivers from certain directions, the impacts are considered to be not significant. The Council's Committee report concludes

these impacts would be acceptable, and GLA officers agree with this conclusion.

- *Light pollution*

191. The ES includes an assessment of light pollution from the development which concludes the impacts would be negligible (not significant). The Council's Committee report concludes that the most impacts to the most impacted building, St James House, and the surrounding residential buildings, the impacts would be adequately mitigated. GLA officers agree with this conclusion.

Cumulative impacts

192. In terms of cumulative impacts, the redevelopment of this brownfield site is coming forward in line with adopted and emerging site allocations and the vision of the OA for the wider area and the CAZ. Although the site is located within the CA (addressed in detail in the "Heritage" section below), the site is located adjacent to several existing tall buildings and the submitted HTVIA illustrates how the proposals would relate to these and the surrounding area. Furthermore, the ES appropriately assesses the cumulative impacts of the proposal.

Tall buildings conclusion

193. While the application site is not identified as suitable for tall buildings, which is contrary to Policy D9 Part B, GLA officers have assessed the proposals against the criteria set out at Policy D9 Part C and consider the visual, functional, environmental and cumulative impacts would be broadly acceptable, subject to recommended mitigation.

Architectural quality

194. GLA officers are supportive of the quality of materials selected and the proposed colour palette. The proposed finish to the Mason building is successful in marking the northern entrance into the central courtyard and is supported.
195. During the application process the previously complex appearance of the Verso building has been simplified. The many different solid to opening proportions and window styles proposed at application stage have been rationalised. This, along with a simplified materials palette, has supplemented the impact of the massing changes described earlier, to reduce the visual dominance of the Verso building.
196. The south elevation of the Verso building includes a tall façade which comes direct to ground in Rose Walk with no setbacks or other devices to mitigate its

scale and potential 'cliff-like' impact at street level. The applicant has indicated that the facade at lower levels would be articulated to draw a visual datum to align with the datum around the corner on Curtain Road. Detailed design and finishes have been secured by condition.

197. More broadly across the proposed development, from a starting point of analysing and drawing on the immense kaleidoscope of colour and texture in the Shoreditch area, the design has progressed through a number of iterations to explore a successful architectural response. The resulting colour palette and materials selections, whilst not attempting to be exactly as the historic neighbourhood, do achieve an overall appearance that is appropriate to the development, in keeping with the surrounding street scene and achieves a high quality design.

London View Management Framework (LVMF)

198. The south-east corner of the site is within the Background Wider Setting Consultation Area of the Protected Vista from London View Management Framework (LVMF) Assessment Point 8A.1 'Westminster Pier to St Paul's Cathedral'. In accordance with the LVMF, development in the background of this view should preserve or enhance the viewer's ability to recognise or appreciate the dome, peristyle and south-west tower of St Paul's Cathedral, and these elements should generally remain with a clear sky backdrop.
199. The applicant has shown the proposed development in this view within the Heritage, Townscape and Visual Impact Assessment (HTVIA) which concludes the proposed development would not impact this view. GLA Officers have reviewed this information and consider the proposed development would preserve the viewer's ability to recognise the relevant attributes of St Paul's Cathedral and would retain a clear sky backdrop in line with the LVMF and London Plan Policies HC3 and HC4, and Local Plan Policy LP5.

Accessibility and inclusive design

200. London Plan Policy D7 requires residential development to provide at least 10% M4(3) compliant wheelchair user dwellings, with the remaining units to be accessible and adaptable in line with Building Regulation requirement M4(2). Local Plan Policy H1 echoes this requirement.
201. A condition has been secured requiring minimum 10% of all residential units to be Part M4(3) compliant and the remaining 90% to be M4(2) compliant.

Secured by design

202. London Plan Policy D11 specifies that boroughs should work with their local Metropolitan Police Service "Design Out Crime" officers to identify the community safety needs, and also states that proposals should maximise building resilience. NDMP P5 seeks to mitigate public safety risks through design.

203. Local Plan Policy LP29 seeks to ensure new development meets Secured by Design principles, where feasible.
204. The Council consulted the Metropolitan Police's Secured by Design Officer who raised no objection to the scheme however, recommended a Secured by Design condition should be applied.

Fire safety

205. London Plan Policy D5 requires the highest standards of accessible and inclusive design, including safe and dignified emergency evacuation for all building users. London Plan Policy D12 requires developments to achieve the highest standards of fire safety and sets out requirements for developments, including the submission of a fire statement with all major developments.
206. The application is supported by a site-wide fire strategy and a fire statement, as well as a gateway one fire statement, prepared by a suitably qualified professional. These documents provide information on the buildings construction; an evacuation strategy; and includes details ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures in accordance with the requirements of London Plan Policy D12. A condition has been secured to ensure compliance with these documents.
207. The residential buildings would comprise 87-89 Worship Street (Plot F), 91-105 Worship Street (Plot H), Webb Mews (Plot J), 24-26 Holywell Row (Plot K) and Holywell Mansions (Plot L). Of these and Holywell Mansions would be over 18 metres. The application documents confirm this building would be provided with at least two stair cases, as well as evacuation lift and lobby.
208. The fire statement supporting the application confirms all office floors above level 1 have access to two firefighting cores, providing access to evacuation lifts and stairs (noting two evacuation lifts for Plots A [Verso Building], B [St James's House], E [Holywell Court] and G [Carman House]), separate from the firefighting lifts.
209. It is noted that HSE originally responded to Hackney Council with concern regarding the access arrangements and the arrangements for siting of fire appliances for firefighting purposes within Rose Yard/Rose Walk however, this concern has now been removed following review of further information and no objection is raised. The London Fire Brigade were also consulted, and responded to advise the Council they had no observations to make.

Design Review Panel

210. During the pre-application scheme design, the applicant's Planning Statement sets out it engaged in design-led meetings with the Design South East Design Review Panel (DRP) on 29 November 2023 and the LBH DRP on 16 January 2024.

211. The Committee report notes the most recent comments from the LBH DRP were provided on 5 December 2024 which states “*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*”. The Committee report goes on to acknowledge that some of the DRP’s criticisms have since been addressed through reduced massing; changes to proposed materials; and simplification of the built form of the Verso building. The Committee report also highlights DRP criticisms which have not been addressed or significantly changed including oversailing of the Urban Room; undercroft routes; and the prominence of setback upper floors and length of the St James building.

Conclusion on urban design

212. The scheme has many positive placemaking attributes, which include the creation of new public realm with high quality landscaping in a highly accessible central location, an increased volume of development and additional commercial uses providing activity throughout the site. The scale of many elements of the development is in keeping with the surroundings and in line with the predominant scale of development. The scale, bulk and massing of the Verso building is a step change in the CA context, however it is positioned close to an adjacent tall building cluster and serves to represent a transition in scale between the taller City fringe and the wider Shoreditch context. Furthermore, the applicant has worked through an iterative series of design improvements to modify the height, scale and massing impact of the proposals. These include a reduction in the height and bulk of the Verso building; a reduction in the extent of the undercroft to Rose Walk; amendments to the upper storeys of St James House and changes to the façade treatment; and changes to the fenestration on Holywell Mansions.
213. The impacts of the proposed tall buildings are considered to be acceptable in line with London Plan Policy D9 Part C subject to mitigation secured. Appropriate conditions have been secured requiring approval of materials and landscaping; lighting; accessibility; Secured by Design; and environmental impacts. Overall, the scheme would deliver high quality design as required by the London Plan, Local Plan and draft AAP.

Heritage

214. GLA officers have had special regard to the desirability of preserving the listed buildings, their settings and features of special architectural and historic interest under section 66(1) of The Planning (Listed Buildings and Conservation Areas) Act 1990, and have paid special attention to the desirability of preserving or enhancing the character and appearance of the South Shoreditch Conservation Area under section 72(1) of that Act.

215. It is noted that since the GLA called-in the scheme, the NPPF has been updated and there has been subsequent changes the framework for assessing and attributing heritage harm. Any apparent inconsistencies related to harm attributed between this report and the GLA's previous Stage 1 and 2 comments; the Council's Committee report; and the applicant's submission documents are a result of this change.
216. NPPF NDMP HE6 states that when considering the impact of a proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance. HE6 further states that where a development proposal would harm the significance of a designated heritage asset, the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal.
217. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities.
218. Hackney Local Plan Policy LP3 seeks to prevent development that would lead to substantial harm to or total loss of significance of a designated heritage asset unless absolutely necessary. Part C of Policy LP3 sets out requirements for development involving Listed buildings including retention, repair and reinstating historic features and fabric. Regarding Conservation Areas (CA), Part E of Policy LP3 states that proposals affecting CA's will be permitted where they preserve or enhance the character and appearance of the area. Regarding non-designated heritage assets, Local Plan Policy LP4 states that schemes affecting these should conserve or enhance, and reveal, the significance of the assets and their settings.
219. The SALP specifies that all the listed buildings should be retained and any proposal must consider the impact the development would have on the character and setting of these buildings and the conservation area.
220. The site is in the South Shoreditch conservation area and includes 91 to 101 Worship Street listed Grade II* and 103 and 105 Worship Street listed Grade II as shown in **Figure 1** Figure 4 below. The site is also nearby to 24 and 26 Curtain Road (Grade II) (shown on Figure 4), and Church of St Michael (Grade I); Clergy House to West of Church of St Michael (Grade II*); St Michael's Church School (Grade II*). The site also contains locally listed buildings 13-21 Curtain Road and 24-27 Holywell Row (shown on Figure 4). GLA officers assessment of the heritage assets and impacts of the proposed development is set out below.



Figure 4 Shoreditch Works heritage and conservation (Source: Monatgu Evans BHTVIA. October 2024)

Listed buildings

91-101 Worship Street (“Webb Terrace”)

- *Significance*

221. A Grade II* listed terrace built in 1862 and designed by the Architect Philip Webb was conceived as affordable accommodation combining artisan workrooms, shops and homes for craftsmen and their families. The building is of architectural and historic significance, reflecting a transitional style between Arts and Crafts and Gothic architecture and its association with Webb’s philanthropic and later socialist interests. Although the buildings retain notable architectural features, they are currently in poor condition.

222. The buildings are Victorian in style, constructed from London stock brick with stone detailing, angular shopfront windows, recessed entrances and subtle Gothic elements. Numbers 93-101 retain original rear service wings, although later rear extensions, particularly from the 1890’s, have concealed parts of the original rear façades and altered access, light and yard relationships. The buildings also underwent repairs and shopfront changes following WW2 bomb damage.

223. The building's significance lies in its architectural quality, rarity, and association with Philip Webb, a key figure linked to William Morris and the Arts and Crafts Movement. The terrace is described as one of the largest surviving pre-war Arts and Crafts terraced housing groups in London, combining living and working spaces within a working-class housing model.
224. Overall, 91-101 Worship Street is considered of very high heritage value due to its rarity, townscape presence, largely intact principal elevations, and strong architectural and historical associations.
- *Contribution of setting to significance*
225. 91-101 Worship Street is located on the southern edge of the Site, with its principal frontage appearing largely consistent with its original 1862 design. The immediate townscape along the north side of Worship Street is of similar height and appearance, contributing positively to the listed buildings' immediate setting.
226. Later buildings have been inserted tightly to the rear of the listed terrace, obscuring its rear façade and other elevations of the original Webb design. As a result, later alterations to the terrace's rear elevations and courtyard area are considered to make little or no contribution to the listed building's heritage significance.
227. The historic street pattern of Worship Street and surrounding streets contributes to understanding the listed buildings' historical significance. By contrast, more recent development on Worship Street—particularly the commercial building opposite—does not reflect the character or architecture of the heritage assets and does not contribute to their significance.

103 and 105 Worship Street

- *Significance*
228. 103 and 105 Worship Street are Grade II listed and located within the Site boundary, along its southern edge. They are described as early 18th century buildings with early-mid 19th century frontages. The buildings sit adjacent to the Grade II* Philip Webb terraces and read as part of a coherent historic group through consistent materials, scale, and line of commercial units fronting the street. They represent the area's historic commercial character and identity, including features such as the brick barrel-vaulted passageway at the base of No. 103, evidence of historic access routes. Their significance derives from the buildings' age, architectural character, historic fabric, and typical materials, alongside their strong group value with nearby listed buildings, particularly the adjacent Webb Terrace and their positive contribution to the local townscape.
- *Contribution of setting to significance*
229. The setting is strengthened by the immediate relationship with the Philip Webb Grade II* terraces, together creating a consistent and intact streetscape through scale, detailing and materials. However, surrounding commercial

redevelopment in the wider area is considered to make a limited or detracting contribution to significance.

Listed building heritage impacts

230. The proposed scheme, prepared by RGA as conservation architects, seeks to deliver a programme of repair, restoration and sensitive adaptation. The approach is informed by a detailed understanding of the buildings' history, significance and surviving original fabric. It aims to preserve and restore historic features, remove harmful modern interventions, and reinstate original layouts where possible, while ensuring compliance with current building regulations and enabling appropriate residential and commercial uses.
231. External works include roof and chimney repairs, replacement or repair of rainwater goods, removal of redundant modern fixtures, brickwork repairs and lime repointing, window and shopfront repairs, restoration of historic metalwork, and repair of the granite drinking fountain. Internally, the proposals include removal of modern partitions, staircases, sanitaryware and kitchen units; restoration of historic staircases, finishes and features; reopening blocked windows and openings; installation of new services; asbestos removal; and provision of new kitchens, bathrooms and fire safety measures.
232. Post-war rear structures, which currently obscure the original terrace form, would be removed and replaced with a sensitively designed mews development with landscaping, new trees and planters. This would reveal restored rear elevations and introduce a new public route from Worship Street, allowing appreciation of the listed buildings from the rear.
233. Overall, the proposed works to the listed buildings would deliver heritage benefits through the repair, restoration and enhanced setting of the listed buildings, contributing positively to the immediate streetscape and the wider South Shoreditch Conservation Area. This is a public benefit to be considered in the overall planning balance.
234. In terms of indirect impacts, the verified views looking west along Worship Street (views 7, 7.1 and 7.3) show the listed buildings in the context of modern, large scale commercial development in the foreground on the north and south sides of Worship Street and in the backdrop of the Webb Terrace (most notably 65 Clifton Street). The proposed development is glimpsed above the eastern end of the Webb Terrace. While this would be experienced as part of the established context of modern development, it would detract from the ability to appreciate the terrace's roofline, causing a degree of harm. While the proposed Verso building is obscured from view in these views, it is likely to be visible to some degree at the junction with Curtain Road and along the southern side of Worship Street. Given the heritage significance of the Webb Terrace, the proposed height and location of the Verso Building is considered to cause I harm at a middle extent to Webb Terrace, and to a lesser extent (low to middle) to Numbers 103 and 105 Worship Street.

South Shoreditch Conservation Area

235. The South Shoreditch Conservation Area (SSCA) was designated in 1991, merged with the Shoreditch High Street Conservation Area in 2009, and extended on 16 September 2019 to include a small triangular site to the south. Further boundary extensions, together with an updated Conservation Area Appraisal and Management Plan, were approved by the London Borough of Hackney Cabinet on 29 November 2021.

Significance

236. The SSCA derives much of its significance from Shoreditch's evolution into an industrial suburb serving the City of London during the mid to late 19th century, with strong associations with the furniture and printing industries. Earlier development patterns, consistent with settlement growth outside the City, accelerated from the 16th-18th centuries through incremental urban infilling between principal routes. While remnants of a medieval, irregular street pattern survive, the conservation area's prevailing form and legibility are largely shaped by 19th-century interventions, when new routes were driven through existing neighbourhoods (notably Great Eastern Street), resulting in a more regular street pattern. Industrialisation prompted the clearance of earlier building stock and its replacement with purpose-built workshops and warehouses, reinforced by major infrastructure interventions including the Regent's Canal, the Eastern Counties Railway, and the development of Broad Street and Liverpool Street stations. Collectively, these elements underpin the area's enduring industrial character.

- *Townscape, views and setting*

237. Key views identified in the Conservation Area Appraisal and Management Plan (CAA) include Hoxton Square as a landmark at its northern end. Although outward views from the square encompass taller development in the wider context, its character is described as primarily inward-focused, defined by the enclosing built form framing the garden square. Charlotte Road/Rivington Street junction is identified as a local view defined by the tight knit urban grain. The CAA also highlights the area's mix of historic and modern elements, most notably the visibility of City Fringe office development in south-looking views.

- *Site position within the conservation area and sensitivity of setting*

238. The application site is located within the southern corner of the SSCA, where its boundary meets the existing larger scale development along Curtain Road and tall buildings of the City Fringe further to the southeast. Local views enable appreciation of heritage assets (designated, locally listed, and positive contributors) both within and adjacent to the Site. Notable view-based sensitivities include:

- Worship Street (westward views): enabling appreciation of Grade II* 91–101 Worship Street and Grade II 103 & 105 Worship Street;

- Curtain Road (southerly views): including locally listed 13–21 Curtain Road and Grade II 24 & 26 Curtain Road; and
 - Holywell Row (northeasterly views): including locally listed terraces on the east side and positive contributors on the west side.
239. These view corridors form an important part of the site's heritage setting, as they support understanding of the conservation area's special interest through the visibility and relationship of historic building groups, street enclosure, and consistent townscape grain.
- *Contribution of later development (neutral elements)*
240. Due to wartime bombing, which destroyed and damaged substantial parts of the site area, there is a significant presence of post-war buildings within the site. These are generally identified as neutral contributors to the conservation area.

Contribution of setting to significance

241. The proposed development is located entirely within the SSCA. The SSCA lies in a highly connected part of the city, close to key transport interchanges, most notably Liverpool Street Station to the south-east and at the convergence of principal routes around Shoreditch to the east. This strategic connectivity reflects the area's historic evolution, particularly during the 19th century, and contributes to an immediate townscape context characterised by movement and urban activity. Beyond the SSCA, its southern edge has experienced modern redevelopment that has, in places, replaced historic fine-grain urban form with taller buildings on larger plots, introducing a more abrupt shift in scale and grain at the SSCA boundary.
242. Within the SSCA, axial views along street corridors frequently include the Eastern Cluster, reinforcing the SSCA's close relationship with the City and forming part of the wider urban context in which its significance is experienced. The SSCA also sits within a dense network of nearby designated historic areas, including the Bunhill Fields and Finsbury Square Conservation Area to the west and the Kingsland, Redchurch Street, and Boundary Estate Conservation Areas to the east, which together underscore the historic richness and layered character of the wider setting and its contribution to townscape value.

Conservation Area heritage impacts

243. The SSCA is characterised by its fine grain street pattern, largely intact Victorian industrial buildings, interspersed with later development. The site is located within the Holywell Row Character Area and at the SSCA's southern boundary. The CCA identifies the area's character as being made up of a variety of historic industrial buildings, but with a more mixed built character overall, in contrast to the central core of the conservation area due to the greater amount of 20th Century redevelopment. It also acknowledges the effects of WW2 bomb damage. The setting of this part of the SSCA is also made up of

modern, large scale commercial development and the tall buildings in the heart of the City Fringe further to the south-east.

- *Retention strategy and demolition rationale*

244. Some remnants of historic fabric remain within the site, including Victorian elements and the Edwardian building at 7-11 Curtain Road (identified as a positive contributor). These are proposed to be retained within the masterplan. The buildings proposed to be wholly demolished are post-WW2 and are identified by the Council as neutral contributors to the significance of the SSCA. Generally, no harm is caused by these demolitions. It is noted that Historic England's 28 March 2025 consultation response to the Council acknowledges that the harm from this demolition would be limited. GLA officers agree with this conclusion.
245. It is noted that Richard Griffiths Architects have undertaken further investigation of rear structures to the Webb Terrace in response to queries raised on their heritage significance by the GLA and others. This included the rear of No. 97 which includes original built fabric associated with the main Webb Terrace. The investigation included archival research, site inspections and review of survey information. It concluded that while some historic fabric remains, a number of alterations have occurred over time including: removal of chimney stacks, external access stairs removed and replacement of all roofs, including the pyramidal roof to No. 97. It is acknowledged that these alterations have resulted in the rear structures not contributing to the significance of the main Webb Terrace.

- *Immediate site setting – views 7, 7.1, 7.2, 7.3*

246. As a result of post-war interventions, the site has a mixed scale and grain. Heights are typically low-mid rise, with the tallest existing building (64 Worship Street) at six storeys. The proposed development increases this to a largely 6-storey shoulder with taller setbacks to the street facing edges. This includes St James's House (8-storeys), along Curtain Road and Scrutton Street, with a stepped profile to the Verso Building (up to 18-storeys). This represents a significant uplift in scale relative to the prevailing 3-5 storey heights identified in the SSCA Management Plan. While proposed buildings along the site's edges have been designed to reflect the materiality and proportions of the SSCA's historic fabric to some degree, the significant uplift in scale to this part of the SSCA is considered to cause harm (middle to high extent) to its significance.

- *Wider impacts – views 1, 1.1, 1.2, 1.3, 2, 2.1, 2.2, 2.3, 2.4, 4, 5, 6, 8, 8.1, 8.2, 10, 10.1, 10.2, 15, 15.1, 15.2, 15.3, 16, 17, 18*

247. The proposed development would be experienced in glimpsed views from long and mid-range within the SSCA. As indicated by the applicant's ZTV analysis, the level of visibility across the extent of the SSCA is limited due to the fine grain street pattern and relative scale of buildings. Notable impacts include views 1.1 and 1.2, looking south down Charlotte Road, where the Verso Building is visible in the backdrop. Given this view is defined as a linear view in the SSCA Management Plan, due to visual interest created by the uniformity of

materials, scale and proportions, a degree of harm is identified to the SSCA's significance as a result of the Verso Building's dominance at the termination of the views. Notwithstanding, it is also noted that the Management Plan acknowledges that the range of views and vistas within the SSCA mix both historic and modern elements, the most obvious example being the City Fringe office developments appearing in views looking south. The proposed development would be largely experienced in the context of modern tall or large scale development due to the site's location at the southern boundary of the SSCA.

248. The proposed development is at its most visible in views 2.3 at the Curtain Road/Great Eastern Street junction and in view 17 Phipp Street, on the approach from the north. The first view is from within a part of the SSCA with less significance due to its more fragmented townscape and presence of City Fringe and Eastern Cluster tall buildings. The foreground of the Phipp Street view is more intact with a mix of historic industrial and sensitively designed modern buildings. The tight knit urban grain means that visibility of the City Fringe buildings is limited. In both cases, the uniform scale of the SSCA is significantly altered with the introduction of the Verso Building. There is also an erosion of the viewer's ability to perceive the contrast in scale and character between the SSCA and the wider context of the City Fringe. It is considered that this causes harm to the significance of the SSCA as a result.

249. Overall, the proposed development, is considered to cause harm at a middle to high extent to the significance of the SSCA.

Locally Listed buildings (non-designated heritage assets)

13-21 Curtain Road

- *Significance*

250. 13-21 Curtain Road is a locally listed building located within the site boundary. Constructed in 1861 it is significant as the oldest surviving showroom-warehouse in this historically industrial area. The building is notable for being designed to accommodate early mechanisation and its architectural quality, characterised by its formal frontage in white brick and plaster detailing at ground-floor level.

- *Contribution of setting to significance*

251. Its immediate setting comprises buildings of varied scale, age and materiality, although many are brick-built and between two and four storeys. Several surrounding buildings, including those within the site, are neutral post-war structures which make limited or no contribution to the heritage significance of the locally listed building.

252. Beyond the immediate setting, the wider townscape retains a more legible historic industrial character, with surviving historic buildings of modest scale and robust design contributing to an understanding of the area's former industrial function. The setting of 13–21 Curtain Road has, however,

experienced notable recent change, particularly through the construction of The Bard, part of The Stage mixed-use development opposite, completed in 2022. This development incorporates the Grade II listed buildings at 24 and 26 Curtain Road, alongside an adjacent unlisted building.

- *Heritage harm*

253. View 7.2 demonstrates the locally listed building's varied and fragmented setting, its architectural quality standing out against that of lesser, later development. The consistent scale of the northern side of Curtain Road is also evident. The proposed development includes the full retention of the building and refurbishment of its main façade. It would also introduce new buildings of similar scale, proportions and materials, either side of it, forming a consistent response to the building's character and an improved and more consistent built quality to the northern street frontage. However, the contrasting scale and bulk of the Verso Building, rising directly above Numbers 13-21 has an overbearing effect on the heritage asset. When taking into account the refurbishment works and full building retention, the proposed development would result in harm to its significance at a middle to low level.

24-27 Holywell Row

- *Significance*

254. Holywell Row comprises a group of early 19th-century terraced buildings, including former residential and warehouse structures. Numbers 24–26 Holywell Row are located within the site boundary, while 27 lies immediately outside it. 24 and 26 are constructed in buff brick and retain arched sash windows with brick-header detailing. 24 includes a commercial unit at ground-floor level and has a sloping mansard roof with dormer windows. 25 has undergone greater alteration, with a gated vehicular entrance at ground level, later red-brick facing to the upper floors, and replacement windows. 27 is a four-storey 19th-century warehouse of triangular plan form, built in London stock brick with red-brick window-head detailing, a stucco cornice at ground level, 20th-century glazed frontage, flat roof and brick dentil cornice. The group's significance as non-designated heritage assets is derived primarily from its historic and architectural interest as part of the surviving 19th-century industrial and commercial townscape of the area.

- *Contribution of setting to significance*

255. The setting makes a positive contribution to the significance of the buildings. Surrounding development is generally of comparable scale and materials, creating a cohesive street frontage. The narrow historic street pattern, together with nearby 19th-century warehouse buildings, provides important context for understanding the area's industrial character and historic industrial function.

- *Heritage impact*

256. Due to the relative close-knit urban grain and narrowness of Holywell Row, the proposed development is unlikely to be visible apart from potential for glimpsed

views of the Mason Building. As this building is designed to respect the scale and grain of Holywell Row and would form a clear contrast in form and built character from the group of locally listed buildings, no harm is considered to be caused to their significance as non-designated heritage assets.

Other nearby Heritage Assets

24 and 26 Curtain Road

257. 24-26 Curtain Road is a Grade II listed building immediately east of the site, best appreciated in close-range views along Curtain Road. Its setting is already strongly influenced by tall City Fringe development, most notably The Stage Shoreditch, which sits directly behind and forms a significant step change in scale on either side of the heritage asset.
258. While the Proposed Development would result in a substantial change to the immediate setting, it is acknowledged that the existing streetscape is largely defined by a mix of post-war buildings that make a neutral to negative contribution to its setting. The proposals are considered to improve on the quality of the immediate setting through public realm upgrades, contextual architecture and introduction of new routes and activity.
259. Taking these factors into account, the proposed development would result in harm to the listed building at a low level.

Church of St Michael; Clergy House to West of Church of St Michael; St Michael's Church School

260. The Church of St Michael is Grade I listed. The Clergy House immediately west is Grade II*, and the Church School to the north-west is Grade II*. These assets are assessed together due to their shared group value.
261. The buildings are located immediately north of Mark Street Gardens. Their immediate setting is enclosed, shaped by the tight urban grain, flanking buildings, and mature trees within the gardens. Taller buildings are present in the wider setting, glimpsed from Leonard Street and Luke Street.
262. The ZTV suggests some intervisibility between the proposals and listed buildings from within Mark Street Gardens, however mature tree cover largely obscures visibility of the proposed development. Glimpsed views would be seen in the context of tall City Fringe development.
263. As the proposed development would appear as part of their wider setting not impact on principal views of the listed buildings, no harm would be caused to their individual or collective significance.

LBH position

264. The Committee report sets out the Council's detailed assessment which concludes the proposal would cause less than substantial harm to the significance (upper scale) of the South Shoreditch CA and less than substantial (minor scale) to 99-101 Worship Street (not outweighed by enhancements);

and consider harmful impacts have not been minimised as far as possible or that potential benefits have been maximised. The Council's Committee report therefore recommended the application be refused, one of the reasons for refusal being:

“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).”

Conclusion of heritage impacts and planning balance

265. As set out above, GLA officers have considered the significance of affected heritage assets, the contribution of the setting to their significance and the potential impact of the proposed development. GLA officers assessment and identification of heritage harm is summarised in Table 10 below.

Designated heritage asset	Category of harm	Extent of harm	View reference
Numbers 91 to 101 Worship Street, listed Grade II*	Harm	Middle	Views 7, 7.1, 7.3
Numbers 103 and 105 Worship Street, listed Grade II	Harm	Low to middle	Views 7, 7.1, 7.3
South Shoreditch Conservation Area	Harm	Middle to high	Views 1, 1.1, 1.2, 1.3, 2, 2.1, 2.2, 2.3, 2.4, 4, 5, 6, 7, 7.1, 7.2, 7.3, 8, 8.1, 8.2, 10, 10.1, 10.2, 15, 15.1, 15.2, 15.3, 16, 17, 18
13-21 Curtain Road (Locally Listed)	Harm	Low to middle	7.2
24-27 Holywell Road	No effect	No effect	-
24 and 26 Curtain Road, listed Grade II	Harm	Low	-

Church of St Michael, listed Grade I and associated Clergy House and School, listed Grade II*	No effect	No harm	-
40 to 42 Great Eastern Street, listed Grade II	Harm	Low	View 2.3
Bunhill Fields and Finsbury Square Conservation Area and the associated Bunhill Fields Registered Park and Garden, Grade II	No effect	No effect	Views 9, 11, 12, 13,

Table 10 *Heritage harm summary*

266. As set out in the consultations section of this report, Hackney Council consulted Historic England (HE) on the proposed development. HE submitted a representation dated 28 March 2025 in response to the initial consultation, and subsequent follow-up representations in response to Hackney's re-consultation of the scheme and receipts of additional information and responses from the applicant. HE's responses set out its view that the scheme would harm important designated heritage assets and does not appear to have development plan support. It is also noted that Islington Council, the Society for the Protection of Ancient Buildings and the Victorian Society raised concerns about heritage impacts of the proposed development in response to Hackney Council's public consultations of the scheme and its amendments, as detailed in the "consultations" section of this report.
267. NPPF HE6 states that where a development would harm the significance of a heritage asset, the effect on the asset and its significance should be weighed against the public benefits of the proposal. The effect of development on the significance of any non-designated heritage assets should also be taken into account. As set out in Table 10 above, where harm has been identified it is generally considered to be of a low to middle extent, extending to middle to high extent in the case of the South Shoreditch Conservation Area. The harm identified has been weighed against the public benefits of the scheme in the "Conclusion and planning balance" section of this report.

Archaeology

268. The NPPF requires a field evaluation for development on sites which include, or has the potential to include, heritage assets with archaeological interest. London Plan Policy HC1 requires identification, recording and protection of archaeological sites. Local Plan Policy LP6 states that where development is proposed on sites of archaeological significance, desk based assessments and, where necessary, archaeological field evaluation will be required.
269. The application site is within an Archaeological Priority Area. The Greater London Archaeological Advisory Service (GLAAS) which sets out that the development could cause harm to the archaeological remains at the site, and

field evaluation is needed to determine appropriate mitigation. GLAAS also stated that 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 it is considered a two-stage archaeological condition could provide acceptable safeguard. This would comprise 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.

270. GLAAS also noted that, as understood from communications with the archaeological contractor, the remaining uncertainties to be addressed are unable to be addressed prior to the site being made available for demolition. GLAAS therefore recommended that further evaluation be conducted, with an awareness that the results could necessitate further, extensive archaeological excavation, and that there may also be a need to reassess the design of foundations in order to preserve any nationally significant material.
271. In response to the above, the Council's 11 March 2026 Committee report recommended a condition requiring a pre-commencement written scheme of investigation (WSI), as well as any works required by the findings of the WSI. The Council also recommended a condition requiring details of final foundation design. GLA officers have agreed that, subject to conditions and meeting the requirements set out by GLAAS, the scheme would be acceptable in line with the NPPF, London Plan Policy HC1 and Local Plan Policy LP6.

Sustainability, environment and climate change

Energy

272. In 2018, the Mayor declared a climate emergency and has committed to make London net-zero carbon by 2030. London Plan Policy SI 2 requires major development to be zero-carbon by reducing greenhouse gas emissions by improvements on the 2013 Building Regulations, by 35% (with at least 10% for residential and 15% for non-residential coming from energy efficiency measures), in accordance with the energy hierarchy. London Plan Policy SI 3 requires development within Heat Network Priority Areas to have communal-low temperature heating system, with heat source being selected in accordance with a hierarchy (connect to heat networks, use zero carbon or local heat sources (in conjunction with heat pumps, if required), use low-emission CHP).
273. Hackney Council has also declared a climate emergency and aims to achieve net-zero by 2040. Local Plan Policy LP54 requires all new development to regulate internal and external temperatures through design, mitigate the Urban Heat Island (UHI) effect and have regard to maximising the use of the cooling hierarchy.
274. Local Plan Policy LP55 requires all new developments to actively seek to mitigate the impacts of climate change through design, and sets requirements for different types of development. New residential development should meet zero carbon requirements, and non-residential development must achieve

BREEAM “excellent” rating and must be built to zero-carbon. LP55 sets carbon reduction targets in line with the London Plan.

275. Local Plan Policy LP56 requires all development to maximise opportunities to incorporate decentralised energy and sets out that all new major developments should connect to an existing network, unless it is clearly demonstrated that it is not feasible or viable.
276. It is noted that Policy FS08 of the draft Future Shoreditch AAP requires new development to be designed to incorporate measures to adapt to climate change, and sets out specific requirements for major development. Relating directly to energy and overheating, these include minimising the provision of large format glazing, maximising tree canopy cover and urban greening, using building materials that minimise the absorption of heat, use the roof space for renewable energy and/or green infrastructure and minimising glare into neighbouring buildings.
277. The application is supported by an energy strategy, including supporting calculations and required spreadsheets. At Stage 1, GLA officers requested further information and refinement of the energy strategy to demonstrate compliance with the London Plan. This information was subsequently provided and at Stage 2, GLA officers concluded that the scheme is broadly in line with the London Plan, with the requirement to maximise opportunities for photovoltaic (PV) panels and ensuring the whole site is captured in the carbon offset calculation. The scheme demonstrates a 72% carbon reduction for the residential element, and 16% for the non-residential, with a site-wide carbon reduction of 35%. A carbon offset payment of £741,855 has been identified.
278. The Committee report sets out Hackney officers view that an insufficient level of detail has been provided by the applicant and queries the accuracy of the information that has been provided (with the exception of overheating information for residential buildings and future district heat network connection, the latter being secured via s106 Agreement). Notwithstanding, energy is not the subject of a reason for refusal and the Committee report also states that it is possible to condition the submission of detailed documents demonstrating minimum policy compliance per phase.
279. As such, subject to conditions and obligations secured, it is considered that the proposal is compliant with planning policy in this regard.

Circular Economy

280. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI 7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
281. The application is supported by a Circular Economy Statement and GLA template. At Stage 1 GLA officers requested further information and a post-construction reporting condition. Since then, the applicant has provided some

additional information however, as set out in the GLA's Stage 2 report, officers considered some information remained outstanding. Notwithstanding, these matters can be managed by condition. As such, conditions are recommended requiring an updated circular economy statement and post-construction reporting for each phase of development.

282. It is noted that the Committee report raises concerns with the applicant's methodology for calculating the amount of structure to be retained and the inclusion of listed buildings. Notwithstanding this, the Committee report concludes that the scheme is not unacceptable and had the recommendation been for approval, the Council would have secured an updated circular economy strategy by condition.

Whole Life Carbon

283. Policy SI 2 requires developments referable to the Mayor to include a Whole Life-Cycle Carbon (WLC) Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
284. The application is supported by a WLC assessment and supporting copies of the GLA's WLC template. At Stage 1, GLA officers requested further technical information and a condition requiring post-construction WLC reporting to demonstrate compliance with the London Plan. The applicant has since provided further information and, while some structures report emissions below the aspirational benchmark, the majority of the structures have significant retention which is welcomed. As such, GLA officers concluded at Stage 2 that the information submitted addresses the matters raised by GLA officers, subject to the requested condition had approval been forthcoming.
285. It is noted that the Committee report raises concerns with the applicant's methodology for calculating building retention and carbon savings. Notwithstanding, the Committee report concludes that the scheme is not unacceptable and had the recommendation been for approval, the Council would have secured an updated WLC strategy by condition.

Urban Greening

286. Policy G1 of London Plan expects development proposals to incorporate appropriate elements of green infrastructure; Policy G4 expects development proposals to create new areas of publicly accessible open space where possible; and Policy G5 requires major development proposals to include urban greening and sets targets for Urban Greening Factor (UGF) scores.
287. Local Plan Policy LP48 requires major mixed-use or commercial development to provide a UGF of at least 0.3.
288. The applicant has calculated the scheme would achieve a UGF score of 0.32 in accordance with the London Plan and the Local Plan. The UGF score and approval of a UGF masterplan has been secured by condition. It is noted the UGF calculations include a green wall, either modular system or climbers rooted in soil. However, modular systems are classified as combustible external

cladding. A condition has been secured to ensure the development does not include any combustible materials.

Biodiversity, trees and ecology

289. London Plan Policy G6 states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. Policy G7 states that development proposals should seek to retain trees of value wherever possible
290. Local Plan Policy LP47 requires all development to protect and, where possible, enhance biodiversity leading to a net gain. Policy LP47 also requires all development involving development with a roof height of 5 metres or more to provide nesting boxes for swifts, sparrows, starlings and/or bats as appropriate to help preserve endangered urban biodiversity in Hackney.
291. The application is supported by a Biodiversity Net Gain Report which concludes the development could achieve a net gain of 1,385% habitat units compared to the baseline condition. The BNG and the Local Plan requirement for nesting boxes have been secured by condition. Hackney officers have noted the scheme falls within the cost band of a large major development and has calculated a BNG monitoring fee of £17,309.61 which has been secured via S06 Agreement. A condition requiring BNG details has also been recommended.
292. The application is also supported by an Ecological Appraisal which states that the site is characteristic of its urban context and has a low value baseline condition however, it is identified the site has limited supporting potential for breeding birds associated with flat roof areas and the surrounding urban trees, and limited potential for bats across the site, noting the site does not provide suitable habitat for foraging or commuting, and with negligible to very low potential to support roosting bats. The Ecological Appraisal concludes the proposed redevelopment of the site has relatively limited potential for adverse effects on local biodiversity. Notwithstanding, the appraisal recommends mitigation measures including retention and protection of urban trees where possible; consideration to sensitive timings for breeding birds; consideration of the potential presence of bats; and adhering to best practice measures for design and construction including minimising light spill, pollution control measures and identification of a responsible person.
293. A condition has been recommended requiring approval of a tree protection plan, and a bat and bird survey.
294. For the reasons set out above, subject to the recommended mitigation and planning obligations, the scheme would comply with London Plan Policies G6 and G7, and Local Plan Policy LP47.

Water

Flood risk

295. London Plan Policy SI 12 seeks to manage flood risk and encourage the use of Sustainable Urban Drainage. Local Plan Policy LP53 requires all development to have regard to reducing flood risk and decrease vulnerability to flooding, as well as setting out requirements for flood risk assessment and requiring major developments to submit a Sustainable Drainage Strategy.
296. The application is supported by a Flood Risk Assessment (FRA) which identifies the site as being in Flood Zone 1 (low risk) and concludes that the development would not cause effects elsewhere in terms of fluvial and tidal flood risk.
297. Since the original application submission, the applicant has submitted additional information confirming the finished floor levels will be established above the 100-year pluvial flood event where reasonably practicable without compromising inclusive access requirements. The applicant has also set out that detailed design work to prevent displacement of pluvial flood could be secured by condition. This approach is supported by GLA officers and appropriate conditions have been secured.

Drainage

298. The application is supported by an Outline Drainage Strategy which incorporates a range of Sustainable Urban Drainage System (SUDS) measures and confirms surface water run-off will be restricted to a peak discharge of 8 litres/second for all return periods up to and including the 1-in-100 year flood plus 40% climate change event.
299. It is noted that at Stage 1 GLA officers identified that the applicant's drainage strategy assumes infiltration is not feasible. GLA officers requested appropriate soakage tests be undertaken and the results reported before this conclusion is reached. The applicant has since clarified that infiltration is not feasible due to underlying London Clay. This is accepted.
300. Since Stage 1 the applicant has also submitted a note (prepared by Hoare Lea, undated) which provides justification for why rainwater harvesting has not been provided. The note sets out reasons including limited roof space and competing policy priorities (i.e. provision of PV panels, mechanical plant zones and green/biodiverse roofs); limited basement space availability; the high water efficiency designed into the scheme (e.g. dual flush toilets, low-flow taps); other rainwater management measures already included (e.g. green roofs, permeable paving and rainwater attenuation tanks); and increased embodied carbon. This is considered acceptable in this instance.
301. It is noted that the scheme was reviewed by the Council's drainage team who recommended conditions requiring the submission and approval of a 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. This has been secured, as well as a SUDS strategy which will outline the final adopted SUDS measures as the drainage strategy supporting the application is an outline strategy only.

Water efficiency

- 302. London Plan Policy SI 5 seeks to limit the use of mains water to 105 litres or less per person per day, and to achieve at least the BREEAM excellent standard for the Wat 01 water category (or equivalent).
- 303. Hackney Local Plan Policy LP53 requires the design of developments to be water efficient, with new residential developments not exceeding 105 litres per person per day and new developments encouraged to incorporate additional water saving, recycling and efficiency measures.
- 304. It is also noted that the Environment Agency's consultation response to the Council requested a condition for BREEAM 'excellent' standard for water consumption (category 'WAT 01') or equivalent.
- 305. The water efficiency targets in policies SI 5 and LP53 are recommended to be secured by condition and therefore the proposals satisfy the requirements of these policies.

Air quality

- 306. London Plan Policy SI 1 seeks to deliver improvements to air quality by ensuring development proposals so not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits or delay achieving compliance; or create unacceptable risk of high levels of exposure to poor air quality. To achieve this, at a minimum major development proposals must be at least Air Quality Neutral; use design solutions to prevent or minimise increased exposure to existing air pollution and address local air quality problems; be submitted with an Air Quality Positive Assessment; and, for proposals in Air Quality Focus Area's (AQFA's), demonstrate that design measures have been used to minimise exposure. Policy SI 1 also expects large-scale development subject to EIA to consider how local air quality can be improved across the area as part of an Air Quality Positive approach.
- 307. London Plan Policy SI 1 also seeks to reduce the impact of proposals on air quality during construction and demolition, requiring development proposals to demonstrate how they comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings. The control of dust emissions in construction SPG supports this.
- 308. Hackney Local Plan Policy LP58 seeks to ensure new development does not contribute to a worsening of air quality, requiring new development to be at least Air Quality Neutral and to be sited and designed to minimise exposure to air quality. Policy LP58 also encourages the implementation of measures to improve air quality.

309. The site is within the Old Street City Road AQFA. There is also a borough-wide Air Quality Management Area (AQMA) in place due to exceedances of the objectives for NO₂ and PM₁₀.
310. The proposed development would be 'car-free' and will utilise air source heat pumps. The application is supported by an Air Quality Assessment and an Air Quality Positive (AQP) Statement. GLA officers have assessed these documents and consider the scheme would not lead to adverse impacts on local air quality and conditions for future residents and occupiers and that the scheme is AQP in line with London Plan Policy SI 1.
311. To ensure AQP measures will be implemented and can be monitored, a condition is recommended requiring approval of a compliance statement detailing how the completed development complies with the AQP measures in line with the AQP statement, and maintenance of these measures in perpetuity. It is noted that, as set out in the Council's Committee report, the Council's Pollution Air team raised no objection subject to a condition requiring adherence to the AQP approach.
312. The development includes nine backup generators. The generator plant has been assessed by GLA officers, indicating the maximum annual mean NO₂, PM₁₀ and PM_{2.5} concentrations are below the respective screening criteria. The maximum 1-hour mean NO₂ concentration is predicted to be above the screening criteria at one generator flue location, however, this is not expected to lead to more than the allowed 18 exceedances. Site suitability considering the impact of testing the generators using the Monte Carlo method at worst-case receptor locations has been modelled, which shows no predicted exceedances of the 1-hour mean objective in any simulation. The generators would only be tested individually 15 times (a total of 9 hours) per year. This is recommended to be controlled by a planning condition. It is noted that the Council's Air Pollution team noted that if approval were forthcoming a further condition would have been recommended to explore alternative, less polluting alternatives to the proposed diesel generators at the post-planning stage. However, GLA officers consider the proposals can be adequately mitigated by the proposed condition and are considered acceptable for the reasons set out above.
313. In terms of construction impacts, traffic associated with demolition and construction has been modelled for existing receptors on roads used by construction traffic, identifying negligible impacts for NO₂, PM₁₀ and PM_{2.5} at all receptors. The GLA target has also been considered, and whilst exceeding, the development is not expected to have a significant impact. The operational traffic has been screened out as per EPUK / IAQM guidance thresholds. It is noted that the Environment Agency's consultation response to the Council noted that a condition should be secured relating to Non-Road Mobile Machinery (NRMM). GLA officers agree and have recommended a condition restricting NRMM.
314. A dust risk assessment was undertaken and the risk level for the site was determined to be High for dust risk. Appropriate mitigation has been included

and GLA officers have recommended a condition requiring approval of an Air Quality and Dust Management Plan (AQDMP).

315. In summary it is considered that the scheme would not lead to adverse local air quality conditions and all construction and operational impacts can be satisfactorily mitigated through the recommended conditions. As such, it is considered the scheme complies with London Plan Policy SI 1 and Local Plan Policy LP58.

Contamination

316. Paragraph 196 of the NPPF encourages the use of brownfield sites and requires planning decisions to ensure a site is suitable for its proposed use, including consideration of any contamination, and making provisions for remediation.
317. Local Plan Policy LP58 seeks to ensure the potential for contaminated land is investigated and appropriate mitigation identified and implemented.
318. The site is not listed on the Council contaminated land register however, the site is categorised by the Council as a site of potential concern (SPC). Hackney's Pollution Land officers reviewed the proposals and raised no objection subject to conditions requiring a detailed phased contaminated land risk assessment and investigations into the risks posed by Radon and Unexploded Ordnance. These conditions have been secured.

Noise and vibration

319. London Plan Policy D14 states that development should avoid significant adverse noise impacts on health and quality of life. The Mayor's Environment Strategy aims to reduce the number of people adversely affected by noise and includes policies and proposals to support this aim.
320. Local Plan Policy DH6 seeks to ensure the amenity of surrounding uses and the overall living standards of the existing environment do not become unreasonably impacted. This includes noise disturbance issues, loss of access to shops and services for local residents.
321. The ES includes a Noise and Vibration assessment which concludes that, during construction works there would be impacts to sensitive receptors up to a major adverse (significant) impact under the worst-case scenario. Notwithstanding, the ES also notes that any significant effects would be temporary (short or medium term) and localised, and the effects are not unusual for the construction of a new major redevelopment.
322. The application is supported by a Construction Environmental Management Plan and a Construction Logistics Plan which sets out how amenity impacts during the construction phase of the development would be minimised and mitigated. Further, construction would be limited to standard hours of construction.

Transport

Transport policy context

323. Chapter 15 of the NPPF sets out the Government's aim to promote the use of sustainable modes of transport. NPPF National Decision-Making Policy (NDMP) TR3 sets out the Government's aims to locate development in sustainable location, using existing or planned infrastructure. Any significant impacts on the transport network should be mitigated.
324. NDMP TR4 seeks to create well-designed places, with transport considerations integral to design, including prioritising sustainable travel modes, efficient delivery of goods and levels of parking appropriate to the location.
325. NDMP TR6 requires development proposals likely to generate significant amounts of movement to be supported by a transport assessment and travel plan. Development proposals should be refused if they would have a severe adverse impact on the transport network.
326. Chapter 10 of the London Plan sets out the Mayor's policies on transport and the strategic approach for transport in London. London Plan Policy T1 sets out a strategic approach for transport in London. London Plan Policy T2 sets out where development proposals should demonstrate how they will deliver improvements to facilitate the Mayor's Healthy Streets Approach, by prioritising walking, cycling and public transport. Policy T5 requires development to remove barriers to cycling and support the delivery of a London-wide network of cycle routes. Policy T6 requires a car-free or restricted level of general car parking to be provided, except for disabled persons parking in line with Policy T6.5. Other relevant policies are T3, T4, and T7, which relate to transport connectivity and safeguarding, delivery, servicing, and construction. Policy T9 sets out how planning obligations will be sought to mitigate impacts from development, which may include the provision of new and improved public transport services, capacity and infrastructure, and making streets pleasant environments for walking and socialising.
327. The Mayor's Transport Strategy (2018) ('MTS') seeks to promote sustainable mode shift, reduce road congestion, improve air quality, and assist in the development of attractive, healthy and active places. The MTS aims to ensure that by 2041, 95% of all Central Londoners' (CAZ) trips will be made on foot, by cycle, or by public transport. The Mayor's Tackling Violence Against Women and Girls Strategy (2026) recognises the importance of inclusive design in encouraging sustainable travel.
328. The Hackney Local plan sets out several policies relating to sustainable and active travel. Policy LP41 requires all new development to positively contribute to transforming Hackney into one of the most attractive and liveable neighbourhoods in London, in line with Healthy Streets and Vision Zero objectives. Policy LP42 specifies that all new development must promote sustainable transport and highlights that sites are required to improve the pedestrian environment and contribute towards achieving a world class public

realm linking the site to transport infrastructure as well as facilities and amenities, including the provision of high-quality safe road crossings where needed. Policy LP43 requires development to mitigate significant negative impacts on transport infrastructure and Policy LP44 requires new major development to contribute to improving transport infrastructure, sustainable transport and the public realm. Policy LP45 requires new developments to be car-free.

329. The draft Future Shoreditch AAP identifies the application site (part of allocation FS0S 05) and highlights the importance for improved connections through the site and public realm.
330. Hackney Council adopted a sustainable transport strategy which has an aim to tackle the climate emergency and meet the Mayor of London's Net Zero 2030 target. The plan identifies Shoreditch High Street Station as a key transport node which will support future growth.

Trip generation

331. The application was supported by a Transport Assessment (TA) which was subsequently amended in September 2025. The trip generation was derived from survey data using the Trip Rate Information Computer System (TRICS) database which selected similar sites as a comparator. The trip generation assessment shows the expected number of trips for each land use in the AM and PM peak and over the full day, including delivery and servicing.
332. For the total gross trip generation, across a whole day, there would be 7,992 trips. In addition, the forecast mode share has been adjusted to reflect local characteristics and the car-free proposals; car driver and passenger trips are reassigned proportionately to other modes. It is a robust assessment taking account of the type of development and City Fringe location.
333. The expected net change is 692 additional AM peak trips and 620 in the PM peak from a baseline of the existing land uses on site. The most significant increase forecast is on the London Underground (LU) and Rail (including Overground), together totalling over 500 additional AM peak trips.
334. Following minor design changes proposed in September 2025 as referred to above, the assessment was adjusted to show these small decreases:
- Morning (AM Peak): decrease of 27 two-way trips (from 1,137 to 1,110)
 - Evening (PM Peak): decrease of 33 two-way trips (from 1,027 to 994)
 - Total Daily: decrease of 116 two-way trips (from 7,704 to 7,588).
335. Public transport impact has been assessed considering the local context and net trips. This took account of the site's PTAL of 6b and available local public transport options.

336. Hackney Council have expressed concern that the total impact of the trip generation on the surrounding network may have been underestimated. TfL considers that the trip assessment is robust and moreover that the package of mitigation outlined below, including a detailed travel plan, delivery and servicing plan, and relevant financial contributions would address identified impacts sufficiently and appropriately.

Public transport capacity

- Shoreditch High Street London Overground Station
337. Shoreditch High Street London Overground Station, located 380 metres from the application site, has recently experienced higher demand from growth and development in the South Shoreditch area since it opened in 2011 and is currently the busiest station on the London Overground network in Q1 of 2026. TfL has therefore assessed the impact of future anticipated demand there in order to understand where and when crowding and capacity problems may occur. This has led to the feasibility and design work for a scheme to alleviate the anticipated growth.
338. The proposed development would result in 292 additional trips in the AM peak. Based on the above analysis around future demand at the station, a proportionate contribution of £250,000 is therefore required towards future station improvements to alleviate predicted congestion issues caused by cumulative development in the locality, in line with London Plan Policy T4.
- Shoreditch Road Safety Improvement scheme contribution
339. TfL has consulted publicly on proposed highway, public realm, and active travel improvements at Shoreditch High Street, Great Eastern Street, Commercial Street, and Bethnal Green Road. This scheme directly borders the northern edge of the site. The scheme responds to identified safety issues, high pedestrian demand, and the strategic need to support sustainable transport in line with the London Plan and TfL's Healthy Streets and Vision Zero objectives.
340. The submitted transport analysis indicates the development would result in an additional net increase of 265 active travel trips using the A10 during the AM peak, including some to access specific local public transport stops and services. Across the day, occupiers of the proposed development would directly benefit from the scheme which would provide enhanced safe and convenient active travel connections to public transport and amenities.
341. Based on developer contributions secured from nearby permissions and schemes nearby and the proximity of the site to the scheme, TfL have requested a financial contribution of £561,374.24 towards TfL's improvement scheme. This is based upon the net trips to and from the site expected to use the scheme area in the AM peak and should be agreed by the applicant via S106.

342. Given part of TfL's proposed scheme falls within the agreed s278 area scope of works it is expected that this would be delivered as part of the works via a S278 agreement with TfL.

Walking, cycling and Healthy Streets

343. The proposed site layout has been designed to enhance pedestrian permeability by creating routes through the site for pedestrians and future visitors. The layout and public realm strategy also supports the Healthy Streets approach by prioritising people over vehicles, improving wayfinding and enhancing the quality of the pedestrian environment both during the day and after dark.
344. The proposals originally considered by Hackney put forward a range of essential S278 works valued by the Council at approximately £1.52 million, though that figure would not be capped as the scope and cost is subject to change. This is deemed acceptable.
345. Further public realm improvements outside the redline boundary, which the Council considered and recommended be secured, were estimated to cost approximately £1.3 million. Whilst the Council advise their estimate for such works was not based on concept or detailed designs, GLA and TfL officers are confident this contribution could be used appropriately by the Council within the vicinity of the site.

Active Travel Zone Assessment

346. The applicant submitted a daytime and nighttime Active Travel Zone (ATZ) Assessment of key routes. The assessment recommends improvements relating to new pedestrian crossings and tactile paving surrounding the site as shown in the illustrative masterplan below and these will be addressed as part of the S278 and/or public realm improvements.
347. One notable absence of suggestions is regarding improvements to the A10, which has a number of collisions on this route towards Shoreditch High Street Station. As covered above, the applicant is aware that TfL has a scheme for this area to improve pedestrian and cyclist safety and should nonetheless commit funding.
348. The nighttime ATZ assessment concluded that most routes are of an acceptable quality due to CCTV, natural surveillance and active frontages. However, Holywell Lane (route 3) is highlighted as lacking active frontage. TfL is the highway authority for this area and will consider lighting improvements. Implementation of the 201-207 Shoreditch High Street development located on this section (route 3) should also improve natural surveillance and active frontage.

Car parking

349. Given the proposed configuration of the site the development would not have any on site vehicle parking, including any disabled spaces. Car free

development is in accordance with London Plan Policy T6 and Local Plan Policy LP45. This will be secured via the S106 Agreement.

350. The adjacent public highway of Curtain Road, Scrutton Street, Holywell Lane and Worship Street currently accommodates on-street parking (38 permit holders and 39 pay and display bays). The applicant's supporting documents highlight that there is an issue with illegal parking on Holywell Lane and Worship Street when the site was being assessed for parking requirements. This is expected to be overcome via the proposed S278 works and public realm improvements, including extending footways and repurposing the highway.
351. For the residential component, the proposals should provide Blue Badge parking for 3% of units from the outset and 7% should demand arise. The applicant has identified locations for 9 (3% of units) on street spaces within 50 metres of front entrances, for delivery via the S278 Agreement. Should further demand arise, this should be able to be accommodated within the vicinity, which is considered to be acceptable and should form part of any future Parking Design and Management Plan. It is also noted that Hackney currently allow people with Blue Badge permits to park in any existing on-street parking bays.
352. A Parking Design and Management Plan (PDMP) will be secured via condition, in accordance with TfL guidance. This should also demonstrate how and where the on-street bays will provide Electric Vehicle Charging points in compliance with London Plan policy.

Cycle parking

353. The proposal includes 953 Long-stay and 226 short-stay cycle parking spaces (a total of 1,179 spaces), as shown in Table 11. Access to the long stay cycle parking would be located in a combination of ground floor and basement levels and the short stay within the public realm, which is acceptable.

Land use	Long-stay	Short-stay	Total
Office (Class E)	784	56	840
Retail (Class E)	23	157	180
Residential (C3)	136	11	147
Urban Room (Sui Generis)	10	2	12
Total	953	226	1,179

Table 11 Proposed cycle parking spaces

354. This complies with the London Plan policy minimum requirements across all land uses but not the higher Hackney Local Plan Policy LP42 requirements for quantum, design and mix, noting the Council's Committee report identifies a

deficit of 522 spaces across the scheme. To offset that shortfall, the applicant is committed to provision of high-quality design and end of journey facilities, which will be secured by condition, and provision of a cycle hire contribution, which is secured by the draft S106 Agreement. The London Plan was published more recently than the Local Plan officers note the under-provision of cycle parking against the Local Plan was not included as a recommended reason for refusal. Officers note the London Plan goes further than the Local Plan by identifying higher cycle parking requirements for offices developments in certain locations, including the borough of Hackney, where a greater number of cycle trips are made. The London Plan has given consideration to cycle usage in the borough and the proposed development complies with the London Plan minimum requirement. As such, GLA officers consider the proposed quantum and quality of cycle parking is acceptable.

Cycle hire

- 355. At consultation stage, TfL requested a financial contribution of £100,000 and safeguarded land towards the delivery of a new Cycle Hire docking station to mitigate the additional pressure on the existing local network.
- 356. Space has not been safeguarded within the application site. Acknowledging the constraints on space in the public realm. The above contribution will be applied flexibly, either to deliver a new docking station or to increase cycle hire capacity in the vicinity of the site to mitigate the uplift in demand. The financial contribution will be secured as part of the S106 agreement.

Electric Vehicle Car Club and Car Club membership

- 357. As highlighted in the LB of Hackney Committee report, although a car-free development is supported, some vehicle trips are still forecast, therefore the use of electric vehicles could be enabled. A contribution of £10,000 towards the introduction of an Electric Vehicle Car Club (EVCC) is therefore secured in the S106 Agreement, including a car-club membership and driver credit for future residents. This is in line with the aspirations of the Hackney Transport Strategy and therefore is acceptable on this occasion.

Use of the public highway

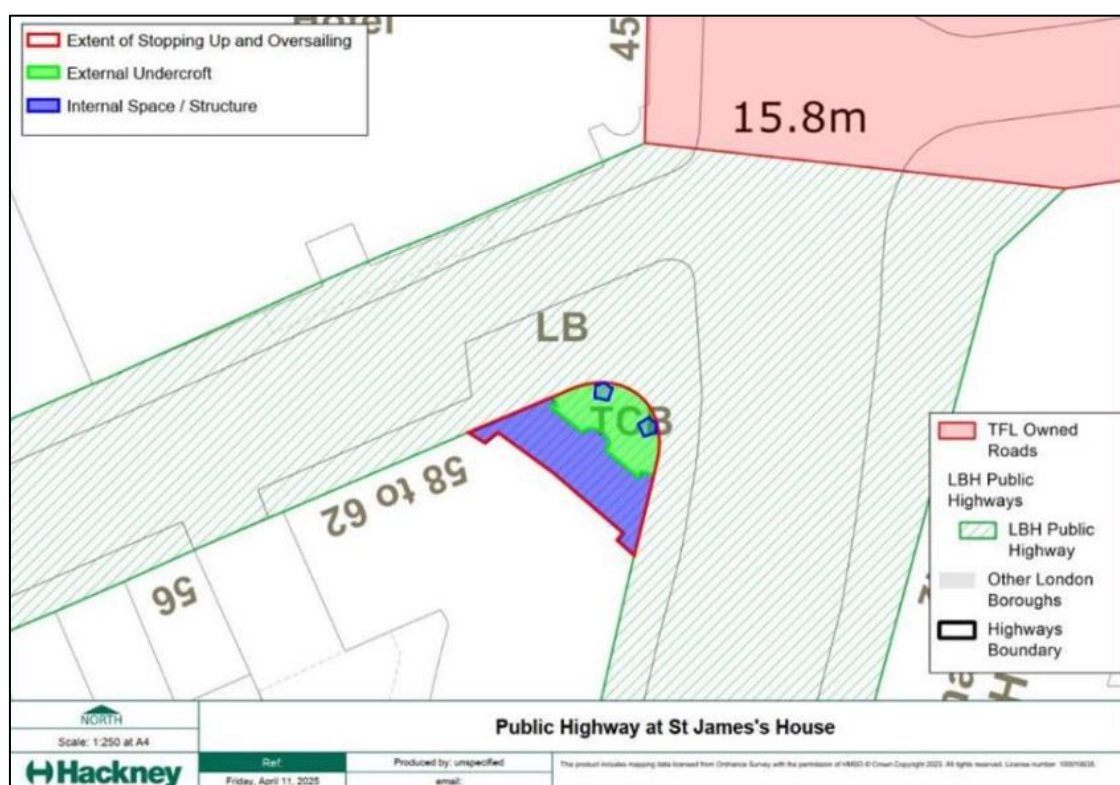


Figure 5: Public highway required to be stopped up

358. Part of the development would be on a small area at the corner of Scrutton Street and Curtain Road, which is currently Hackney public highway. However, TfL's records (see Figure 5 above) indicate this falls within their TLRN highway boundary. Either way, both TfL and LBH have indicated that the required stopping up is acceptable in principle; on the proviso that the surrounding highway may first have to be altered to ensure sufficient pedestrian capacity and safety, along with footway accessibility being maintained.
359. The required stopping up order may incur further fees for designing, consulting and implementing any alterations involved at no cost to TfL or the Council. There may also be a fee for the land itself, which would need to be agreed separately.

Delivery and servicing plan

360. Hackney Council policy is that new development must incorporate designated spaces for deliveries within the boundary of the development, where appropriate, and provide Delivery and Servicing plans (DSP) which encourage provision for low-emission, consolidation and last mile delivery modes. London Plan Policy T7 supports this.
361. The applicant has submitted a strategy via the TA and DSP. Servicing is proposed to be a combination of some on-site within a loading bay and 3 on-street bays, which will be designed in accordance with TfL guidance. The applicant estimates 187 delivery and servicing trips per day. This is a net

increase from the existing delivery and servicing vehicle trips of 115 trips per day with 17 trips per peak hour. It is noted that the DSP would be a live document and remain the responsibility of the site management team and would also include a delivery survey once the development is occupied and operational. This will act as a baseline monitoring for the site, in accordance with TfL guidance.

362. The intensification of the site would lead to an increased demand for servicing trips where there is considerable competition for kerbside space, creating a need to manage the overall number of vehicles on street in the local area.
363. Mitigation measures may include:
- On site management system
 - Booking system
 - Peak hour restrictions
 - Waste Management Strategy
 - Use of cargo bikes
364. The applicant has stated that the use of cargo bike deliveries would be encouraged and permitted to service during peak hours. A monitoring review, cap on vehicle numbers and protocol would also be agreed with the Council as part of the final discharge of condition.
365. The proposals are considered acceptable. Hackney officers have recommended further robust measures including financial contributions and agreements to limit the overall number of vehicles, in line with local policy and the Hackney Sustainable Transport Strategy.
366. The final arrangements should be funded through developer contributions via the S106 and S278 agreements. This will include a £2,000 monitoring fee. Overall, on balance, the proposed mitigation package for deliveries and servicing is considered acceptable, with the final DSP secured by condition.

Refuse strategy

367. Waste collection would be undertaken via a hybrid servicing strategy. This includes three inset loadings bays split between Scrutton Street, Curtain Road and Worship Street, as well as an internal servicing yard to be accessed via a new crossover on Curtain Road. The servicing yard is designed to accommodate large vehicles which can enter and egress the site in forward gear.
368. The Council considered that the waste strategy is well thought out and therefore acceptable. GLA officers agree and have secured this by condition.

Construction Management

- 369. Local Plan Policy LP43 highlights that the transport and environmental impacts of development construction must be minimised and mitigated through Construction and Logistics Plans (CLPs), incorporating adherence to the Construction and Logistics Community Safety Scheme (CLOCS) and the Freight Operator Recognition Scheme (FORS) On-site.
- 370. A Framework Construction Management Plan (CMP) has been provided, and a detailed plan, prepared in accordance with TfL guidance, is secured by condition.
- 371. For Hackney Council to effectively monitor the final CMP, a base monitoring fee of £17,500 is secured in the draft S106 Agreement.

Transport summary

- 372. The development proposal would result in an increase in net trips within the public realm and on the surrounding public transport network. However, the proposal will be subject to appropriate mitigation including financial contributions to transport where direct, proportionate and reasonable. The proposals are therefore considered acceptable in transport terms. In line with London Plan Policies T1, T2, T4, T5, T6, T7 and T9 and Local Plan Policies LP41, LP42, LP43, LP44 and LP45.

Mitigating the impact of the development through planning obligations

- 373. Regulation 122 of the Community Infrastructure Levy Regulations 2010 as amended in 2019 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are statutory tests.
- 374. The NPPF states that “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”
- 375. Hackney Planning contributions SPD 2020 provides further guidance on how the Council will secure planning obligations, where these are necessary to mitigate the impacts of development.
- 376. Pursuant to the consideration within the previous sections of this report, and in line with the policy context set out above, GLA officers propose to secure several planning obligations required to appropriately mitigate the impact of this development, which are set out above and where appropriate there is detailed consideration given in the relevant topic section of the report. GLA officers are confident that the obligations in the Section 106 agreement meet the tests in

Regulation 122 of the CIL Regulations 2010 as amended in 2019 as they either will not be spent on “infrastructure” as defined in the regulations or will be sufficiently narrowly described in the section 106 agreement.

Legal considerations

377. Under the arrangements set out in Article 7 of the Order and the powers conferred by Section 2A of the Town and Country Planning Act 1990 (as amended) the Deputy Mayor, acting under delegated authority, is the Local Planning Authority (LPA) for the purposes of determining these planning applications ref: 2024/2201 and 2024/2162 (Listed Building Consent).
378. Section 35 of the Greater London Authority Act 2007 inserts section 2F into the Town and Country Planning Act 1990 which includes a requirement that for applications the Mayor takes over, the Mayor must give the applicants and the borough the opportunity to make oral representations at a hearing. He is also required to publish a document setting out:
- who else may make oral representations;
 - the procedures to be followed at the hearing; and,
 - arrangements for identifying information, which must be agreed by persons making representations.
379. The details of the above are set out in the Mayor’s Procedure for Representation Hearings which reflects, as far as is practicable, current best practice for speaking at planning committee amongst borough councils.
380. In carrying out his duties in relation to the determination of this application, the Deputy Mayor must have regard to a number of statutory provisions. Listed below are some of the most important provisions for this application.
381. Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that in dealing with such an application the authority shall have regard to:
- a) The provisions of the development plan, so far as material to the application;
 - b) Any local finance considerations, so far as material to the application; and
 - c) Any other material consideration.
382. Section 70(4) defines “local finance consideration” as:
- a) A grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or

- b) Sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.
383. Furthermore, in determining any planning application and connected application, the Mayor is required by section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine the application in accordance with the Development Plan (i.e. the London Plan and the adopted Local Plan) unless material considerations indicate otherwise.
384. Other guidance, which has been formally adopted by Hackney Council and the GLA (e.g. Supplementary Planning Documents and Supplementary Planning Guidance), will also be material considerations of some weight (where relevant). Those that are relevant to this application are detailed in this Representation Hearing report.
385. GLA Officers are satisfied that the current report to the Deputy Mayor has had regard to the relevant provision of the Development Plan. The proposed section 106 package has been set out and complies with the relevant statutory tests, adequately mitigates the impact of the development and provides necessary infrastructure improvements.
386. Regarding the Community Infrastructure Levy (CIL) considerations, the Mayoral CIL payment associated with this development is estimated to be £2,301,170.73 whilst the Hackney CIL payment is estimated to be £12,549,548.41.
387. In accordance with his statutory duty in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Mayor shall have special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess. The Mayor is also required to give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by the proposed development (section 72 of the of the Planning (Listed Buildings and Conservation Areas) Act 1990). These matters have been addressed within earlier sections of the report.
388. Where the Mayor takes over an application, he becomes responsible for the section 106 legal agreement, although he is required to consult the relevant borough(s). In this instance, there have been a series of lawyer led meetings to discuss the section 106 content, and it has progressed on a number of key issues. Both the Mayor and the borough are given powers to enforce planning obligations.
389. When determining these planning applications, the Mayor is under a duty to take account of the provisions of the Human Rights Act 1998 as they relate to the development proposal and the conflicting interests of the applicants and any third party affected by, or opposing, the application, in reaching his decision. Planning decisions on the use of land can only be taken in line with the Town and Country Planning Acts and decided in accordance with the development plan unless material considerations indicate otherwise.

390. The key Articles to be aware of include the following:
- a) Article 6 - Right to a fair trial: In the determination of his civil rights and obligations... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.
 - b) Article 8 - Right to respect for private and family life: Everyone has the right to respect for his private and family life, his home and his correspondence.
 - c) Article 1 of the First Protocol - Protection of property: Every person is entitled to the peaceful enjoyment of his possessions.
391. It should be noted, however, that most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted i.e. necessary to do so to give effect to the Town and Country Planning Acts and in the interests of such matters as public safety, national economic well-being and protection of health, amenity of the community etc. In this case this Representation Hearing report sets out how this application accords with the Development Plan.
392. Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are now statutory tests.
393. The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
394. The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.
395. GLA Officers are satisfied that the application material and officers' assessment has taken into account the equality and human rights issues referred to above. Particular matters of consideration have included provision of affordable housing, accessible housing and the protection of neighbouring residential amenity.

Conclusion and planning balance

396. As detailed above Section 38(6) of the Planning and Compensation Act 2004 requires matters to be determined in accordance with the development plan unless material considerations indicate otherwise.
397. When assessing the planning application, the Deputy Mayor is required to give full consideration to the provisions of the development plan and all other material considerations. He is also required to consider the likely significant environmental effects of the development.
398. GLA officers consider that the proposals generally complies with relevant planning policies at national, regional and local level, with conflicts arising with policies HC1 of the London Plan and LP3 and LP4 of the Local Plan, relating to heritage and policy LP14 of the Local Plan relating to unit mix.
399. The scheme would make a significant contribution towards meeting Hackney's workspace targets, by delivering approximately 55% of the new office floorspace envisaged by the Local Plan or approximately 33% envisaged by the draft AAP. Furthermore the scheme would deliver at least 8.3% of the jobs identified for the Opportunity Area. As such, the scheme complies with London Plan Policies SD4 and E3, as well as the vision of the CAZ and the City Fringe OA.
400. In terms of housing, the scheme would deliver 78 residential units, providing an uplift of 40 new units or 5,090 sq.m. of additional new residential floorspace compared to the existing. The scheme would deliver 35% affordable housing comprising 62% social rent and 38% intermediate housing, in a Fast Track Route compliant scheme in accordance with London plan Policies H5 and H6. While the proposed affordable housing would not accord with Local Plan LP13, This is a further significant benefit of the proposal.
401. The scheme would achieve 1,385 biodiversity net gain and exceeds the policy requirement for urban greening. Furthermore, the scheme would deliver circa 3,600 sq.m. of new public realm and would introduce new public routes and increased permeability through a site which is currently inaccessible to the public. This would comply with London Plan Policies G1, G6, D8 and Local Plan Policies PP1, LP47 and LP48. It should be noted that discussions are ongoing in relation to the delivery of the public realm. The section 106 agreement will deal with a mechanism for the delivery of the public realm (including the timing of delivery), but it is acknowledged for the purposes of GLA officer recommendation that the constrained nature of the site means that some of the public routes and public realm will be linked to the overall development of the site and may not be open to the public until the scheme is nearly complete.
402. GLA officers have had regard to the Planning (Listed Buildings and Conservation Areas) Act 1990 and NPPF in assessing the heritage harm and considering the planning benefits of the scheme. As detailed in the Heritage section of this report, the proposed development would result in a low to high level of harm to the significance of heritage assets as identified in Table 10 of

this report, and would therefore conflict with London Plan Policy HC1 and Local Plan Policies LP3 and LP4. Great weight must be given to the harm identified.

403. The proposals would provide a number public benefits, which would weigh in favour of the scheme, though these benefits are attributed differing weights in the planning balance. Phase 1 of the scheme would deliver a significant quantum of office floorspace (43,866 sq.m. GIA) which would in turn provide a significant number of construction jobs and apprenticeships, and operational jobs. This includes 2,720 sq.m. (GIA) of affordable workspace in St James's Place, which the draft S106 Agreement secures the delivery of prior to occupation of the Verso Building within Phase 1 (the 18 storey building to which most of the heritage harm is attributed). This ensures upfront delivery of the majority of the affordable workspace, estimated at approximately 95%, and the significant benefits this would provide.
404. While Council officers have raised concerns with the aggregate approach to the affordable workspace rent, GLA officers consider the ability to provide a greater discount to some tenants has the potential to provide a significant benefit and opportunities to businesses who need it. To ensure this discount is applied appropriately and the benefits are delivered, the draft S106 Agreement secures monitoring of the aggregate payments and an affordable workspace statement, to be approved by the Council, setting out details of occupiers and rents to ensure no rent on affordable workspace exceeds 40% of the open market rent. Further to this, Phase 1 includes the Urban Room (625sqm) which would provide discounted floorspace as well as a significant amount of free-usage slots for community groups, as set out in the draft S106 Agreement. While Council officers have raised concerns with the use of the Urban Room, GLA officers have worked with the applicant and the Council to define the activities permitted to take place in the Urban Room and an Urban Room Remedial Action Plan in case there is a breach of this use, as set out in the draft S106 Agreement.
405. Phase 2 of the development would deliver a further 13,032 sq.m. of floorspace comprising ground floor retail and office on the floors above, providing significant further construction and operational employment and training opportunities.
406. Overall, while the scheme would result in heritage harm it is noted that the proposed works to the listed buildings would deliver heritage benefits through the repair, restoration and enhanced setting of the listed buildings and restoration of the drinking fountain, contributing positively to the immediate streetscape and the wider South Shoreditch Conservation Area. The scheme would introduce new pedestrian access and routes through the site, and new public realm in the form of the Rose Yard as well as play and amenity spaces throughout the site which would be accessible to the public. The scheme also proposes 35% affordable housing (by habitable room) which would come forward in Phases 3 and 4.
407. GLA officers acknowledge these benefits would not be delivered until Phases 3 and 4, being the latter phases proposed. Therefore, although these benefits are considered in the planning balance, these benefits are attributed less weight

than those delivered in the earlier phases. Notwithstanding, the draft S106 Agreement prevents the occupation of more than 85% of the commercial floorspace until all the residential units have been made ready for occupation and the Listed building works have been completed. This would secure delivery during occupation of Phase 2. GLA officers recognise the complexity of the construction of this development and the desire to avoid conflict between future on-site residents and construction. A further note on the construction phasing of the development has been provided by the applicant and is published alongside this report.

- 408. Furthermore, GLA officers have secured a further improvement to the 85% occupation trigger, which is now reflected in the draft S106 agreement as being linked to “newly constructed” commercial floorspace, thereby excluding the retrofit components of the development.
- 409. The scheme also includes the delivery of off-site public realm improvements, as agreed with the Council and to be secured via S278 Agreement, biodiversity net-gain, urban greening, a contribution to local cycle hire and a significant quantum of CIL.
- 410. Considerable importance and weight has been attached the harm to heritage assets in accordance with statutory duties and national policy in concluding why the benefits outweigh the harm. Officers acknowledge that Historic England and other heritage consultees maintain objections to the scheme. However, it is concluded that the heritage and that the public benefits, as described throughout this report and summarised above, and as secured by condition and the draft S106 Agreement, would clearly and convincingly outweigh the heritage harm in this instance.
- 411. The balancing exercise under paragraph HE6 of the NPPF is therefore favourable to the proposals and the proposal would be acceptable in terms of impact on heritage assets. Overall, and notwithstanding some elements of policy conflict identified above, the proposed development is considered to accord with the development plan, read as a whole, and there are no material considerations justifying a departure from the plan or indicate that planning permission should be refused.
- 412. This report has considered the material planning issues associated with the proposed development in conjunction with all relevant national, regional and local planning policy, and has found that the proposed development is acceptable. The benefits of the proposal would not be outweighed by the adverse effects, in line with the NPPF (NDMP S4). Accordingly, it is officers’ recommendation that planning permission and listed building consent should be granted, subject to the obligations and conditions stated within this report.

For further information, contact GLA Planning Unit (Development Management Team):

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We are committed to being anti-racist, planning for a diverse and inclusive London
and engaging all communities in shaping their city.