

Pre-Application Planning Sub-Committee – 12/03/2024

ADDRESS: Shoreditch Works (Site Allocation 125), Land bounded by by Curtain Road, Worship Street, Holywell Row and Scrutton Street EC2A	
WARD:	Hoxton East and Shoreditch
REFERENCE NUMBER:	2022/0150/PA
APPLICANT:	Estate Office and HDG Ltd
ARCHITECT:	Kohn Pedersen Fox Associates (KPF)
PROPOSAL: Employment led mixed use redevelopment of city block (80,951m ²), including 19 storey (104m AOD) tower.	

ANALYSIS INFORMATION

ZONING DESIGNATION	YES	NO
CPZ	X	
Central Activities Zone	X	
City Fringe Opportunity Area	X	
Conservation Area	X	
Listed Building (Statutory)	X	
Listed Building (Local)	X	
Priority Office Area	X	

1. PROPOSAL

- 1.1. The proposal involves redevelopment of a 1.3 ha site and represents one of the largest opportunities for comprehensive employment led development in the borough, with opportunities to provide a full range of uses on an underdeveloped site. It represents an employment led, mixed use redevelopment of most of the urban block and allows for some retention of the superstructure of the existing buildings to be demolished. The new floorspace would be predominantly in office use but with active frontages at ground floor level, set around new public realm within the interior of the block.
- 1.2. 78 residential units would also be provided, an increase from the 38 units that are on the existing site.
- 1.3. The Grade II* Listed Phillip Webb buildings (91-101 Worship St.) would be retained and refurbished, as would Locally Listed buildings at 13-19 Curtain Road and 24-26 Holywell Row, along with Buildings of Townscape Merit at 40-46 Scrutton St, 52-56 Scrutton St and 87-89 Worship St.

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2. BACKGROUND

- 2.1. The proposals are currently at pre-application stage and have not been subject to formal public consultation through the planning process. Two days of public consultation were carried out on 11th and 12th December 2023 by the applicants to create local awareness.
- 2.2. The proposals have been subject to a Hackney Design Review Panel (DRP) and, on the applicants' instigation, a Design Review undertaken by Design South East.
- 2.3. The applicants have stated that they wish to submit a full planning application (plus Listed Building Consent) in April this year.

3. SITE DESCRIPTION

- 3.1. The site occupies an entire urban block within the South Shoreditch Conservation Area bounded by Curtain Road to the east, Worship Street to the south and Holywell Lane and Scrutton Street to the north-west. The building heights on the site range from 3-6 storeys and there are a number of rear yards serving various buildings in the block. There are currently a mix of uses on site with offices, residential, retail and community uses.
- 3.2. To the east of the site, outside the conservation area, are the mixed use developments Principal Place and The Stage, both of which have tall residential towers and large mid rise office buildings. To the south are large office buildings with the City of London, with the city cluster further to the south. To the north and west are low-mid rise buildings in a mixture of commercial and residential uses.
- 3.3. The site is located within the South Shoreditch Conservation Area and contains a number of listed buildings, locally listed buildings and buildings identified as buildings of townscape merit in the South Shoreditch Conservation Area Appraisal.
- 3.4. The site has the maximum Public Transport Accessibility (PTAL) level of 6b. It is within the Shoreditch Priority Office Area and the Central Activities Zone.
- 3.5. The site is considered a key development site in the City Fringe Opportunity Area Planning Framework (OAPF) and is an allocated site in current and emerging local policy.

4. PLANNING HISTORY

- 4.1. None relevant.

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5. KEY MATERIAL CONSIDERATIONS

- 5.1. The pre application process has so far drawn responses from LB Hackney officers, the Greater London Authority (GLA), Historic England and two Design Review Panels.
- 5.2. The key issues for consideration by the pre-application sub-committee at this stage are land use, massing, design, conservation and sustainability, since other matters are not yet fully defined by the submissions seen to date.

6. Land Use

- 6.1. *Policy*
- 6.2. The site is in a Priority Office Area. The place policy for Shoreditch and Hoxton in the new Local Plan (PP8) states that development should intensify the use of land to optimise the capacity of Shoreditch to accommodate homes, workplaces, cultural and creative uses without compromising its special character. Local plan policy LP12 (Meeting Housing Needs and Locations for New Homes) identifies a need for 7000 homes in Shoreditch during the plan period.
- 6.3. The Site Allocation Local Plan (SALP) looks at the entire urban block and the proposal site is approximately 80% of that area. The SALP estimates:
 - 12,329m² GEA additional commercial floorspace
 - 31,536m² GEA new residential floorspace (432 units at an average of 73m²)
 - This totals 43,865m² of new floorspace across the allocation site.
 - There is 38,239m² existing floorspace across the site allocation site.
 - The existing and estimated new GEA would therefore be 82,104m².
- 6.4. *Emerging Policy*
- 6.5. The site is allocated in the emerging Shoreditch Area Action Plan (Future Shoreditch) which will, once adopted, replace the SALP site allocation. The emerging AAP has some weight in decision making and will gain more weight as it progresses through the plan making process towards adoption (eventually gaining development plan status). Given the pre-application status of the proposals it is important that emerging policy is taken into account in providing comments. The following guidance is set out for development in the Central Shoreditch Neighbourhood area:
 - At least 60% B1 Office Space (before introduction of Use Class E)
 - Not appropriate for tall buildings (defined as 50% taller than the prevailing height)
 - Prevailing heights of 3-6 storeys
 - All development will need to demonstrate how it protects or enhances the character of the conservation area and in respect of the area's fine urban grain

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- 6.6. The emerging allocation for the site in the Future Shoreditch AAP (which will be subject to further consultation) sets out the redevelopment of the site as a mixed use, office-led development with a substantial provision of residential units alongside ground floor retail and leisure uses. The most recent design work for the draft allocation suggests that appropriate building heights for key frontages around the site would be between 4-7 storeys. Set back elements of 1-3 additional storeys are shown. A 7 storey massing is proposed for the corner building of Scrutton Street and Appold Street. Along Curtain Road, 6 storey frontages with set backs to a height of 9 and 8 storeys are shown. Along Holywell Row and Scrutton Street new frontages are 4-5 storeys, with well set back elements of 5 and 7 storeys respectively. A tall building of 12 storeys is located in the central part of the site.
- 6.7. The emerging site allocation requires any redevelopment proposals to have due consideration of the site's heritage context, including the setting of the South Shoreditch Conservation Area, the site's Grade II* Listed buildings, Locally Listed building and Buildings of Townscape Merit and those heritage assets beyond the site boundary.
- 6.8. The emerging site allocation indicates that the capacity of the site should be approximately 48,600 sqm:
- Residential - 167 units (34%)
 - Office - 29,200 sqm (60%)
 - Retail - 2,700sqm (6%)
 - Total = 48,600 sqm
- 6.9. The emerging Future Shoreditch AAP sets out an employment-led approach to growth in Shoreditch, with different neighbourhoods having different percentage requirements for office floorspace. The direction of travel reflects the fact that, since the adoption of the SALP and LP33, a number of large office schemes have been approved in Shoreditch that would go a long way to meet the LP26 policy target to “deliver a minimum of 118,000sqm of new office floorspace by 2033.” As such, though any scheme in this location needs to be employment-led, in a number of meetings since the beginning of the pre-application process, we have noted that the need for 7000 residential units in Shoreditch (as per LP12) and that this site, due to its size, provides opportunities to help meet that need.
- 6.10. In this POA location with a tight urban grain, smaller sites are typically able to provide only one core and residential units are not proposed. This site presents a significant opportunity for positive redevelopment which would deliver an uplift in commercial floorspace alongside much needed residential floorspace and complementary retail and leisure space. As such, the adopted site allocation and draft (emerging policy) site allocation are clear that residential units must be maximised within an employment led scheme, to reflect the scale of the site.
- 6.11. As currently presented 40 additional residential units are proposed, replacing 38 existing units on site with 78 units proposed in total. The applicants “intend

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meeting the ‘fast track’ criteria” for Affordable Housing, which would be 35% of the proposed units to be provided on-site at the relevant tenure split (policies H5 and H6 of the London Plan). This is the GLA fast track criteria and Hackney’s position remains that any proposal below policy compliance (on-site delivery of 50% at a relevant tenure mix) would be subject to a viability review.

7. Design and Conservation

- 7.1. Policy LP1 (Design) of LP33 seeks to adopt a rigorous design approach and ensure a good and optimum arrangement of the site in terms of form, mass and scale. Policies D1 (London’s form, character and capacity for growth) and D2 (Optimising site capacity through the design-led approach) of the London Plan (2021) require that development respond in a positive manner to the existing context, where possible enhancing it, whilst policy D3 (Delivering good design) seeks to ensure that buildings and structures are of the highest architectural quality.
- 7.2. Policies HC1 of the London Plan and LP1 of Local Plan 2033 require proposals to make a positive contribution to the character of the historic and built environment by preserving or enhancing the character and appearance of conservation areas and the setting of listed buildings.
- 7.3. LP33 Policy LP1 set clear tests that must be met in order for a tall building to be acceptable. Policy LP1 defines tall buildings as taller than its neighbours (50% taller than the prevailing building height) or which significantly changes the skyline or is 30 metres or more in height. LP33 sets out that further development plan documents, such as AAPs, will provide further requirements for each of the places identified in the Growth Strategy, including Shoreditch. Work is underway as part of preparing the emerging Future Shoreditch AAP to gather evidence to inform the final tall building policy for the area.
- 7.4. As above, the wider site is allocated as site 125 within the Hackney Site Allocation Local Plan (2016) and as FSOS05 in the draft Future Shoreditch Area Action Plan (2019), which explore design principles.
- 7.5. London Plan Policy D9 (Tall Buildings) supports proposals for tall buildings where they are of an exemplary standard, contributing positively to the character of the area, reinforcing the spatial hierarchy of the context and aiding legibility and wayfinding. Proposals resulting in harm to the significance of London’s heritage assets and their settings would require clear and convincing justification, demonstrating that there are clear public benefits that outweigh that harm.
- 7.6. The London Plan recognises the City Fringe as an Opportunity Area, with an indicative number of homes and jobs at 15500 and 50500 respectively. The City

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Fringe Opportunity Area Framework (OAPF) designates this as a 'Key Site' and it notes that:

“5.77 Whilst there are areas within Shoreditch that would provide sites appropriate for tall buildings, it is important to note that land-use will drive design to a large extent. Aspirational land-use and likely resultant typologies should therefore inform floorplate, height and other aspects of design. A tall building designed for residential use is likely to have a considerably different form to one designed primarily for employment use. Similarly, a tall building containing a mix of residential and employment uses is likely to be a mixed typology that attempts to optimise floor space for both uses in separate elements of the building, for example by using a podium and tower solution.”

- 7.7. In the Site Allocation Local Plan (2016) the guidance for the site states that “The heritage quality of some of the buildings and the conservation area status do not prevent redevelopment, however, they would inform the height and scale of new development (the prevailing height across the site is generally 4-6 storeys). Taller elements may be appropriate subject to the appropriate approach in relation to listed buildings and the conservation area. The size of the site and differing character of buildings and setting requires new development to contain a series of buildings of varied design, rather than a single or a few buildings.” (SALP 2016)
- 7.8. As above, the Council’s emerging work on the Shoreditch Area Action Plan suggests that the appropriate height for key frontages around the site allocation is between 4 and 7 storeys with further top levels stepped back. Towards the centre of the site it identifies the opportunity for greater height where the conservation area is not adversely affected.
- 7.9. In the South Shoreditch Conservation Area, legislation and policy sets out Hackney’s responsibility to preserve and/or enhance areas of heritage value. The South Shoreditch Conservation Area Management Plan identifies these areas of heritage value. It draws a clear distinction between the contrasting characters of the City and its fringe, and the Shoreditch Conservation Area: “At the border of the South Shoreditch Conservation Area there is a significant contrast in building heights where they step down dramatically within the Conservation Area. It is notable that there is no transition zone but a clear distinction between inside and outside of the Conservation Area.” (South Shoreditch Conservation Area Management Plan 12.7.2). This contrast contributes to the identity of a globally attractive zone where the historic and creative intensity of Shoreditch sits immediately adjacent to the international character of the City.
- 7.10. Within the Conservation Area, the guidance points toward avoiding excessive height within the area but also outside of the boundary: “Taller buildings located on the border of the character area can, unless sensitively designed, appear unduly prominent when compared to the uniform height of buildings within the character area” (South Shoreditch Conservation Area Management Plan 48.12.2) and “All

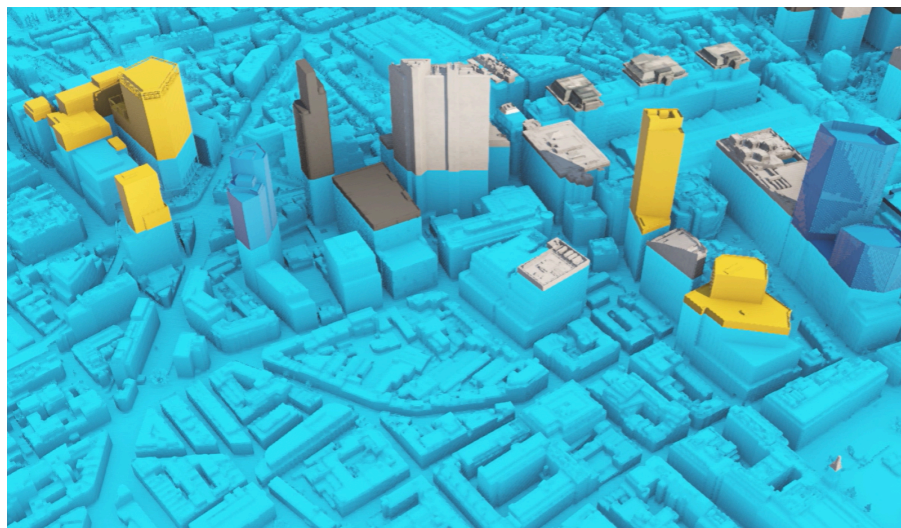
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new development should respect the established layout, siting, height, scale and massing of buildings within the Conservation Area” (12.3.1)

- 7.11. The Holywell Row character area forms an area with a strong and highly valued character defined by consistency of scale and a juxtaposition between those buildings inside and outside of the conservation area.
- 7.12. *Significance of the Area and Buildings*
- 7.13. The site is within the South Shoreditch Conservation Area and takes up the majority of a very large, low density urban perimeter block adjacent to the City of London’s northern fringe, which is outside the conservation area. The site has a low density core and a perimeter of street-facing buildings of varying but generally good quality, with some very good quality positive contributors and listed buildings, as well as characterful, but not historically significant, post-war commercial buildings.
- 7.14. Buildings directly facing the Conservation area, and the site, on Worship Street and Curtain Road have frontages of up to 10 (ground +9) storeys (approx 30m) with taller elements up to 16 storeys (55-60m) set well back. These buildings, which include recently completed offices in the Stage development, mediate between taller buildings further south and east, and the scale of the conservation area with approximately two tiers of step at a maximum of 30m and 60m. There are no buildings above 16 storeys (60m), completed or proposed, against the southern boundary of the conservation area. Within the conservation area, nearby buildings have an upper limit of around 9 storeys (c33m) with a prevailing height around 5 storeys (c16-18m). The largest buildings in the nearby conservation area that are under construction or recently completed are around 9 storeys (c33m) with shoulder heights of around 6 storeys (23m). The Art’otel has been constructed at 27 storeys (92m) at the western nodal point of Great Eastern Street, with an approved scheme at 201-207 Shoreditch High Street at the opposite end of Great Eastern Street being 30 storeys (104m).
- 7.15. The image below sets a level at 30m, showing the step down height towards the conservation area (yellow shows those consented but not yet built. Some will not be built in the form shown):



- 7.16. The next image sets the level at 55m, showing the second tier of step between 100m+ towers and Conservation area):



- 7.17. *Layout, connections and public realm*

- 7.18. The applicant proposes a series of intimately scaled courtyards, alleys, undercroft and open lanes leading to a larger central space suitable for leisurely use or for holding events. Officers recognise the scale is similar to other Shoreditch courtyards but have questions around the likely microclimate and over whether the space will be compelling or distinct enough to add significant public value to the site. There are also questions over how it would relate to the Stage open space on the adjacent site. How much public benefit can be attached to the proposed open space in the middle of the site is a key issue for the planning balance. Officer feedback, along with two DRP (Hackney and Design South East) responses have asked that the internal public space be rethought to have a stronger personality, form and identity, with more coordination of geometry, character and scale to better define the central space. At present, the central

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space amounts to a widening of the routes through the site, space that is 'left over' from the layout of the buildings, rather than with a clear identity of its own.

- 7.19. All of the routes into the public realm, bar one, utilise undercroft passageways. These could feel unwelcoming, especially where views through them do not lead to recognisably 'public' spaces or destinations, as here, and where the width of routes running past retail might be too narrow. Officers are keen to ensure that the passageways and routes that connect the site with its context are as legible and welcoming as possible and that views through them are compelling.
- 7.20. *Height and massing*
- 7.21. Hackney supports the principle of densification of the South Shoreditch Conservation Area and the optimisation of development scale in suitable and appropriate locations, while also being conscious that the conservation area is defined by a lower density character than the adjacent City. The increased density through extra height, along with the juxtaposition of building heights, may be positive for some parts of the site but could have a significant harmful impact on the integrity of the conservation area.
- 7.22. *Principle of a tower*
- 7.23. The applicant has proposed a development which includes a 19 storey (104m building). Hackney policy defines the threshold for a tall building in South Shoreditch to be around 8-10 storeys or 24m-30m. The location of the tower has been chosen by the applicant to minimise visibility within the conservation area but key impacts remain, including visibility above the Grade II* listed Philip Webb buildings on Worship Street. The distinction between Shoreditch and the City in this Conservation Area location is also a consideration.
- 7.24. HE and the GLA have commented on the principle of a tower here with HE advising that: "Proposals to redevelop the site including a very tall building [104m] are of concern given the harm that would be caused to the historic environment, which is without clear Development Plan support."
- 7.25. The tower is the most significant element proposed, but the analysis below also considers the numerous Shoreditch-scale buildings which are proposed as part of the scheme. Officers are keen to ensure that the massing of these buildings responds positively to the character of Shoreditch. The success of these buildings will be dependent on setbacks and the relationship between new massing and retained buildings and frontages.
- 7.26. *Individual buildings*

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- 7.27. Elevation, sections and floorplan drawings are yet to be produced, so the following comments are based on the information that has been provided, such as CGI's and indicative floorplans.
- 7.28. *Plot A (Tower)*
- 7.29. A 19 storey, 104m tall tower is proposed to be located on Curtain Road in a location which the applicant has identified as being the part of the site where height would be least obtrusive in conservation area views. The applicant is seeking a building here of a roughly fixed 90,000m² floor area. An earlier proposal for a taller, slimmer building with a smaller footprint but with greater visibility across the conservation area, has evolved into the current shorter and wider massing.
- 7.30. In recent meetings the applicants have sought to make the case that this scheme is not viable if it were to include a tower of reduced proportions. No viability information has been produced.
- 7.31. The tower plot will define much of the edge of Curtain Road and the central public space as well as routes into the site from Curtain Road. Routes onto Curtain Road at the north and south end of the tower plot are undercroft. The success of these routes and the relationship of the base of the tower to the streets and spaces it defines is an important consideration.
- 7.32. The massing of the scheme is in flux but is composed of multiple elements which are raised or dropped to minimise visibility in key views. The question is of whether the massing is conducive to a successful or attractive building and whether the height and massing is suitable for the location.
- 7.33. Of specific consideration is the impact on the view from Worship Street towards the Grade II* Philip Webb Buildings. The upper storeys of the tower will be visible in the backdrop of views of the buildings looking up from the street and this is considered to be harmful. Historic England have also expressed concern, stating in their letter dated 10/08/23 "There is some potential to cause harm to the listed Worship Street dwellings where the upper part of the proposed tall building would appear directly behind them, and more broadly in dramatically changing the character of the urban block which they form part of."
- 7.34. Other notable views of the tower from within the conservation area include one from the lower end of Curtain Road where the tower is setback behind elevations and retained buildings.
- 7.35. The substantial width of the tower, which could incorporate multiple cores, has the potential to provide residential accommodation, which would be considered to be a stronger public benefit than the office accommodation, but the applicants have been clear that they are not able to provide dual uses within it. As such, the

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question remains over whether there is sufficient public benefit to justify the harm caused by the tower on its surrounding streetscape, as identified by Historic England, the GLA, two DRP's and the feedback from officers throughout the pre application process.

- 7.36. *Plot B- 'Flat Iron' Building (Corner of Curtain Road and Scrutton Street)*
- 7.37. Five buildings are merged into one and there are concerns on how this will impact on the grain of the area. In particular, the cumulative impact of merging of plots is likely to be a reduction in the complexity and interest of the area.
- 7.38. On the corner the proposal has a 6 storey shoulder height with a 2 storey setback. Officers' advice has stated that in the context of the Holywell Row Character Area a 5 storey shoulder height would be considered to integrate better with the townscape with potential for 2 set back floors above. The question remains of how well the proposed massing relates to the lower scale of Scrutton Street and the incorporated terrace.
- 7.39. *Plot C*
- 7.40. Officers welcome the retention of the building in its entirety. The careful treatment of this building is one of the conservation highlights of the proposal.
- 7.41. *Plot D*
- 7.42. The proposed building has an important landmark role, visible along several of the routes into the site and marking an important junction. Hackney DRP feedback suggests that "the shape of the building seems arbitrary and that it could be both simpler in shape and more assertive. The Panel considers that the development possibly introduces too much variety, with this building not helping to reinstate consistency. It welcomes the use of coloured tiling, but questions its use across all sides and full elevations of the building and recommended that this be reconsidered and refined."
- 7.43. *Plot E*
- 7.44. A massing of around 3 to 5 storeys is proposed, to respond to the constraints of the Holywell Row terrace to the rear. Details are limited at this stage but from the central courtyard the massing and general architectural approach seems acceptable for an early stage proposal.
- 7.45. *Plot F*
- 7.46. The existing building is identified as making a positive contribution to the character and appearance of the SSCA. Few details have been provided regarding the extent and significance of the parts of the building proposed to be demolished.

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- 7.47. A question remains over whether the proposed architectural approach sits comfortably within the context and works with the existing building. It has previously been recommended that a more sensitive approach that reflects the existing building is used, in order for the retained building to positively contribute to the historic character of the inner courtyard rather than appearing like a new building. The loss of the rear elevation may make the building appear as simply a retained historic facade.
- 7.48. *Plot G*
- 7.49. The proposed massing and mixture of retention and rebuild is welcome from a design point of view. The high quality building on site is the former warehouse at the rear of the site which would form an attractive and characterful frontage to the proposed square. The proposed massing on Curtain Row at 5 storeys with a set back 6th storey is likely to be appropriate and the retention of the ground level facade is welcome. Concerns have been raised regarding the visibility of this building behind the chimneys of the Grade II* Webb buildings and the visibility of the 7th storey extension from Appold Street.
- 7.50. Officers are in conversation with the applicants about the proposed architectural approach at this stage. The use of brick as a facade material has been welcomed but there are concerns that the proposed heavily recessed windows and chunky pilasters do not complement the retained structure or link into the surrounding context. There are also concerns with the brick roof extension which appears as an ad-hoc addition.
- 7.51. *Plot J - Philip Webb Mews*
- 7.52. The demolition of the rear mews to the Webb buildings is likely acceptable and could help reveal the significance of the Philip Webb Building, but at present there is a lack of information on the age and significance of the rear extensions to 97-101 Worship Street. Should the extent of demolitions be acceptable the creation of a modern mews is likely acceptable. Subject to further design details the massing and architectural approach also appears acceptable. Officers will work with the applicants to provide further detail over how the area will be accessed and how/whether the alleyways will be used and integrated into the wider scheme.
- 7.53. *Plot H - Philip Webb Buildings*
- 7.54. Officers welcome the attention to the Grade II* Philip Webb buildings and the appointment of a suitably qualified conservation architect. Following a site visit earlier in the summer it was found that the majority of the buildings are in a fair condition but some of the buildings would benefit from routine maintenance.

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- 7.55. The Hackney DRP recommended that the character of the new mews should be more akin to the listed buildings, and also acknowledge development patterns, layout and plot form to help reinforce the special interest of the terrace. The Panel also voiced a concern over impacts to the setting of the building from the visibility of Plot A from Worship Street, noting that it may be a discordant element in the backdrop.
- 7.56. *Plot K*
- 7.57. Officers welcome the retention of the existing buildings. The proposed architectural treatment will need further review, since the full height rear extensions with mansard extension at present dominate the rear elevation.
- 7.58. *Plot L*
- 7.59. The 24% retention of the existing structure and extension is welcomed. However, insufficient details have been provided to understand the visibility in key views such as the Grade II* Philip Webb buildings. Officers have asked for further design work to mitigate the the wedding cake effect of stepping up, with the plant room on top.
- 7.60. It is unclear how the proportions, materiality or details link to the wider area and we would welcome further iterations of the design. Although the building is located within the core of the site, officers have suggested it should still consider the character and appearance of the area. Concerns remain over its relationship to the central space and wider area. One of these internal buildings could contribute a slightly different approach and add to the variety of the site.
- 7.61. *Design and Conservation Summary*
- 7.62. There are clearly positive elements of the proposals which have been carefully considered. However, there continue to be significant conservation and design concerns with the proposals on this site.
- 7.63. Taken as a whole there is a high degree of harm caused to the character and appearance of the South Shoreditch Conservation Area and surrounding townscape as a result of the bulk and massing of a number of the buildings such as Building A, B and D. We acknowledge that over the course of the pre-application discussions the massing of the tower element has been reduced but this has not addressed the concerns of a city-scale building within the SSCA where there is a clear juxtaposition in building heights inside and outside of the area. The backdropping of the Philip Webb buildings has also been consistently raised by both Hackney, two DRPs, the GLA and Historic England. Further details are needed to understand how the massing of the perimeter blocks link into that of the wider townscape, and detailed cross section drawings would be helpful here.

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7.64. Officers welcome the continued evolution of the design of new buildings but again raise the issue that in many cases insufficient details are provided to comment on the detailed design. Each building needs the same level of attention as Plot A is receiving to ensure the highest design quality and to show how it successfully integrates into the townscape and SSCA. We recommend that full elevations are provided of each individual building and that further time is set aside to discuss each individual building plot.

7.65. Officers find themselves in agreement with many of the points raised by the Hackney Design Review Panel within their own overview:

“The Panel welcomes the comprehensive redevelopment of the site and commends the quantity of high-quality analysis and detailed work which has gone into the proposals. However, the Panel does not necessarily agree with the core assumption of the application - that the site is a place of transition between the City and Shoreditch Conservation Area - and questions whether the significant uplift in development will preserve or enhance the conservation area. The Panel feel that the proposal lacks a clear vision for the site, and this is leading to a less than compelling masterplan for the site, with the public realm being spaces that are left over, rather than being at the heart of the proposals. While the scale of retention is considered positive, it is questioned whether the scheme should really be described as heritage-led, and whether the proposals fully celebrate the historic buildings on site or absorb them in a new overriding character. In terms of who the place is for, the Panel wants the scheme to feel truly public to locals and tourists, with uses allowing for 24-hour activity including, perhaps, work and arts, and a broader mix of uses, including play spaces, to help create a ‘flagship’ mixed-use place.”

8. Net Zero, Climate change & energy

8.1. In response to the diversity of buildings proposed on site, the applicant has been asked to prepare a separate energy strategy demonstrating how the both embodied and operational carbon have been minimised for each of the typology. This has not been provided to date and therefore no detailed comments can be provided on the energy use and generation and what opportunities of improvement there might be.

8.2. However, the applicant has provided key metrics specific for each building typology. It is noted that both embodied and operation carbon targets broadly align with best practice when reported on a sqm basis.

8.3. The proposed level of retention of existing buildings is still relatively low and is dwarfed by the proposed amount of new construction. The new development would generate in excess of 40,458,000 kilos of upfront carbon. This is considered to be a significant disbenefit of the scheme, which would need to be balanced against public benefits.

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9. Public Benefits

- 9.1. The scheme provides a significant quantum of office space within the Priority Office Area and the applicants' estimate at this stage is that 6020 jobs could be created, many of which would be additional to the jobs that are within the existing buildings.
- 9.2. 40 additional units of housing would be provided and could be designed to align with current design standards and housing need, unlike the existing ad hoc arrangement of units across the site. The applicants have committed to work with the Borough to find the best route to providing a policy compliant level of Affordable Housing.
- 9.3. The heritage buildings on the site are retained, and while some are repurposed within larger buildings above and to the rear, others are kept in their original form, such as the Grade II* Phillip Webb Buildings and Plot C.
- 9.4. The proposals would open up the site and provide additional public realm, with new routes through and links to the Stage development across Curtain Road.
- 9.5. The applicants have committed to work with cultural institutions in the provision of the public realm, including an Urban Room.
- 9.6. The scheme would provide a sufficient level of planning obligations to mitigate its impacts and would provide policy compliant levels of apprentice opportunities at both construction and operational stages.
- 9.7. While the embodied carbon of the scheme is clearly substantial, the applicants have committed to reuse much of the existing structure.
- 9.8. The question is of whether these identified public benefits balance successfully against the proposed scheme's opportunity costs and impacts and whether it is in line with the vision outlined by the site allocation and emerging site allocation.

10. Other

- 10.1. This is a complex scheme, with many elements that remain unresolved. A meeting arranged for after agenda publication (Monday 4 March) will address the highways and waste strategies, including the feasibility of public realm improvements outside the red line boundary.
- 10.2. In other respects, a fuller assessment of the proposal must wait until a more detailed submission is made, including scale drawings, a daylight/sunlight assessment and viability analysis.

11. Summary

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- 11.1. In summary, the principle of the development is supported and the opening up and redevelopment of the site is welcomed. Nevertheless, concerns are raised with the level of residential floorspace that is proposed within the overall mix. Should such a low quantum of residential floorspace be proposed, there would be significantly fewer public benefits to add to the planning balance against the level of harm identified in the townscape analysis.
- 11.2. The general approach to the site layout and perimeter buildings is understood but given the desire to submit a full planning application within a relatively short time frame, crucial details remain outstanding. Concerns remain in respect of the impact of the proposed tower on the character of neighbouring heritage assets and the wider townscape and the combined height and massing of this building is not supported. The buildings other than the tower are yet to be fully realised and there are questions over the success of the central yard, given the long undercrofts required to access it on the key pedestrian desire lines.
- 11.3. The carbon required to build the tower is considered to be a significant disbenefit of the scheme that would need to be balanced against the wider benefits of the proposal.
- 11.4. Other elements are yet to be fully defined, which means the overall planning balance will be more easily considered following future submissions.

No.	BACKGROUND PAPERS	NAME/DESIGNATION AND TELEPHONE EXTENSION OF ORIGINAL COPY	LOCATION CONTACT OFFICER
1.	Hackney Local Plan 2033 (2020), Hackney Site Allocations Local Plan (2016), the emerging Hackney Future Shoreditch AAP, the London Plan (2021) and the City Fringe OAPF (2015)	Nick Bovaird, X 8291	2 Hillman Street, London E8 1FB