



Planning Applications Sub-Committee

ADDENDUM

Date: TUESDAY, 13 FEBRUARY 2024

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

4. MIDDLESEX STREET ESTATE, GRAVEL LANE, LONDON, E1 7AF

**For Decision
(Pages 3 - 8)**

**Ian Thomas CBE
Town Clerk and Chief Executive**

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Addendum report to Committee Report: Application No: 23/00882/FULL	
Committee	Date:
Planning Applications Sub Committee	13 February 2024
Subject: Middlesex Street Estate, Gravel Lane, London, E1 7AF	Public
<p>Change of use of: (i) part basement, part ground and part first floor levels of six retail units and ancillary residential and ancillary commercial areas, to provide a police facility (sui generis) and ancillary residential parking and storage areas and facilities, and (ii) part ground and part first floor levels from gym use to community space (Class F2); and external alterations including: shopfront changes, installation of plant, erection of flue and louvre treatment, works to podium level and associated landscaping including erection of garden room, associated highways works to Gravel Lane and landscaping, installation of security measures; and associated works.</p>	

1. Changes are proposed to the following paragraphs of the report to address inaccuracies in the number of car parking spaces cited. Therefore three paragraphs are affected, as set out below:

(paragraph 19 of the 'Summary')

It is understood that 34 resident parking permits are in circulation in total and this current allocation of spaces for residents would be maintained as part of the proposals. Based on the results of the surveys, the applicant considers that the reduction in resident parking would not adversely affect the operation of the car park as the recorded maximum demand for private car parking would be provided for, and this would be in excess of the number of identified permit holders (+11 in circulation and +17 as recorded in the maximum parking surveys) providing some level of parking contingency. The Applicant states there will be enhanced car parking management procedures implemented.

163. *Based on the results of the surveys, the applicant considers that the reduction in resident parking will not adversely affect the operation of the car park as the recorded maximum demand for private car parking would be provided for, and this would be in excess of the number of identified permit holders (+11 in circulation and +17 as recorded in the maximum parking surveys).*

295. *The applicant considers that the reduction in resident parking will not adversely affect the operation of the car park as the recorded maximum demand for private car parking would be provided for, and this would be in excess of the number of identified permit holders (+11 in circulation and +17 as recorded in the maximum parking surveys) providing some level of parking contingency. The Applicant states there will be enhanced car parking management procedures implemented.*

2. These three paragraphs will be amended to read:

It is understood that 34 resident parking permits are in circulation in total and this current allocation of spaces for residents would be maintained as part of

the proposals. Based on the results of the surveys, the applicant considers that the reduction in resident parking would not adversely affect the operation of the car park as the recorded maximum demand for private car parking would be provided for, and this would be in excess of the number of identified permit holders providing some level of parking contingency. The Applicant states there will be enhanced car parking management procedures implemented.

3. Paragraphs 21 and 112 state the podium height increases by 370mm. This increase in height of 370mm applies to the majority of the podium however this podium rises to 450mm on one side. This is reflected in the submitted drawings.
4. In paragraph 272 for 'City Planning Obligations', the following will be added to the Highways Repairs: 'Relocation of existing cycle parking on Gravel Lane'.
5. There is a typographical error in paragraph 30 of the 'Summary', and paragraphs 255 and 302 for 'Sustainability', 'load grade' should read '**low grade**'.
6. Condition 17 to be reworded to include the text in bold and underlined:

*Details of a Delivery and Servicing Management Plan and **a Car Park Management Plan** demonstrating **the car parking management arrangements** and arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Delivery and Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building. The Delivery and Servicing Management Plan must make provision for:*

- A maximum number of 12 deliveries per day (which includes facilities management vehicles).

The plan shall include any associated necessary works to the highway to be carried out prior to occupation of the development. The approved measures shall be maintained, in accordance with the Plan, for the duration of the use, unless the prior written approval of the Local Planning Authority is first obtained.

REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1 and DM16.5 of the adopted Local Plan.

7. The following is added to the 'Background Papers':
'Gravel Lane Shop Units and Relocation Updates.'
8. Representation from 'D Rose' from 01.01.2024 was not included in the Representations pack in error and is now attached. Notwithstanding this, the points raised in the letter were taken into consideration in the assessment of the application and the representation is listed in the comments received in the 'Background Papers' section of the report.

From: D Rose
Sent: Monday, January 1, 2024 5:51 PM
To: Figueira, Pearl; [Pln - CC - Development Dc](#)
Cc:
Subject: Comment on Planning Application 23/00882/FULL

THIS IS AN EXTERNAL EMAIL

Dear Pearl

Happy New Year, please accept the following comment on the planning application for the City of London Police Base at Middlesex Street Estate.

Yours faithfully,

David Rose

New Comment on Planning Application 23/00882/FULL

From: David Rose

23A Petticoat Tower

Petticoat Square

London E1 7EF

January 1, 2024

To the Planning Officer,

Further to my initial comments on this application, please include the following additional grounds for objection.

The Middlesex Street Estate suffers from limited road access routes and is an inappropriate place to put an operational police base, especially one whose use will be centred around vehicle traffic such as emergency response cars, motorcycles, bikes, vans and other vehicles.

Access to and from the Estate is largely by a network of one-way streets, narrow carriageways, and circuitous routes, avoiding dead-ends or restricted areas.

There are already problems with access roads becoming regularly blocked or made difficult to navigate due to parked traffic, loading, street markets held daily or weekly, a lack of convenient cycle routes and heavy pedestrian traffic at certain times of day.

Access for vehicles to or from the Square Mile – the territory and precincts of the City of London Police, as opposed to Tower Hamlets (the purview of the Metropolitan Police) - is especially limited.

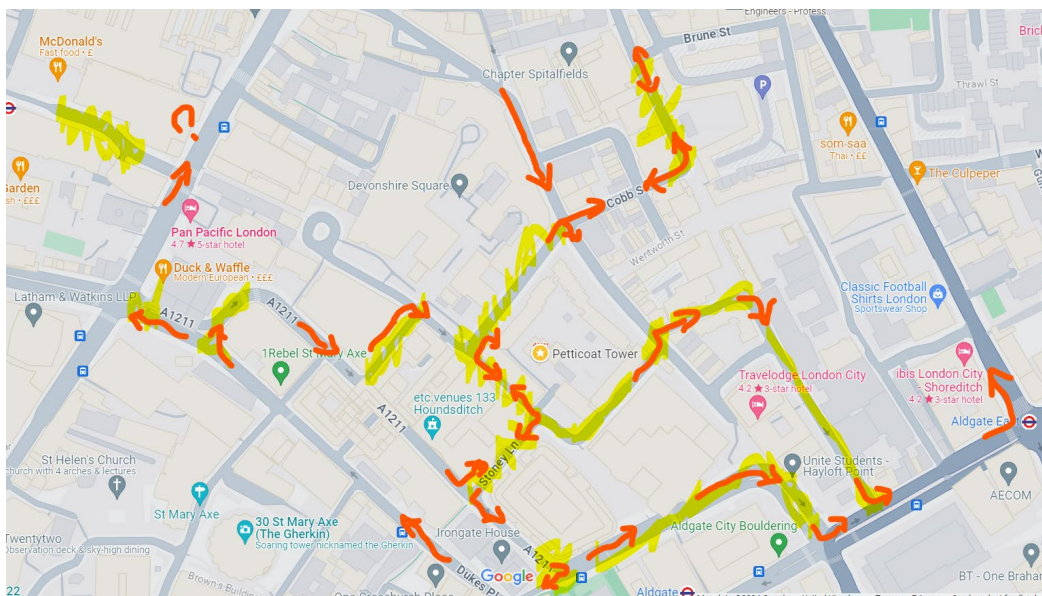
Any increase of traffic to this area, particularly large vehicles such as police cars, vans or loaders, is likely to have consequences for the City of London Police occupiers as well as local residents, businesses and pedestrian foot and cycle traffic.

The results of the development in both the immediate site and surrounding streets, are likely to be:

- Increased congestion, impeded access for residents and service vehicles through higher traffic volumes and worsening air quality
- Increased risk to pedestrians, cyclists and other motor vehicle traffic from circuitous and difficult access routes
- Risks to the police's operational effectiveness and limits and delays to their day-to-day duties and emergency response
- Increased likelihood of police vehicles regularly using sirens, horns etc, causing disturbance to neighbours

Background:

For illustration: sketch map showing main motor vehicle routes to/from the estate, with direction of travel highlighted in red and areas of main congestion / limited access routes shaded in yellow:



As a resident and regular commuter to and from the estate I can say with experience that the above marked routes regularly cause inconvenience or frustrations for the day-to-day motorist. I am concerned about the future effect of the development and knock-on issues for traffic, not just for local residents and services, but for police vehicles performing essential public service or emergency response.

Please note in particular:

Travelling to / from the rest of the City of London, the access routes for the MSE are:

- Middlesex Street via Bishopsgate** – which is problematic as one way and typical vehicle traffic is restricted during weekdays on Bishopsgate, or totally blocked due to market trading on Sundays. Southern end of Middlesex Street is blocked to motor vehicle traffic.
- Cutler Street or Stoney Lane via Houndsditch** – problematic as Houndsditch and Cutler Street are both one way, and are likely to be disrupted severely over the next few years due to demolition and construction works of a major commercial office building at 115 Houndsditch. Further development of this area with similar consequences for road traffic can be anticipated. If Stoney Lane becomes main access route then space is already limited by parking bays along one side of the street and pinch points at:
- Artizan Street / White Kennett Street / Harrow Place.** The roads here are narrow and regularly blocked by traffic such as food delivery or laundry lorries waiting and loading outside the Travelodge, as well as existing police vehicles. The result is blind corners which present a danger to pedestrians, drivers and cyclists, or obstructed carriageways and narrow pavements with no passing spaces and pedestrians often walking in the road.
- Houndsditch / St Botolphs Street.** Due to the one way system and blocking of the

southern end of Middlesex St, the only route back into the City from the Estate is via St Botolphs' Street via Aldgate, which is interrupted by several traffic lights and is often slow. Alternatively, one can take a very hard right turn on the corner next to Tesco Metro, towards Bevis Marks. This is the most convenient route back to London Wall, Bishopsgate, etc, but presents a very awkward corner, given the angle and potential for oncoming traffic, but also complicated by pedestrian crossings, a bike lane and bus stands.

Furthermore, if a vehicle(s) were to break down or otherwise block the entrance to Artizan Street or the access ramp of the Middlesex Street Estate basement car park, it would easily become impassible until cleared, including to police traffic.

As the City of London police are creating an "Eastern Base" with the intention, we assume, of serving their precincts to the west in the rest of the Square Mile, the above access routes are likely to prove very inconvenient and easily blocked or impassable due to traffic or other obstructions.

Should one or more of the very limited routes above become congested or blocked (as in my daily experience they regularly do), the police would find it very hard to do their job or respond / deploy their officers in a timely fashion.

The limits to access are such that they may even present a security risk and/or compromise the ability to respond quickly to an emergency.

If these access routes are blocked, then the only way out from the base would be in an eastward direction via Cobb Street towards Spitalfields market and Commercial Street; or via Gravel Lane, New Goulston Street, Goulston Street to Whitechapel High Street - (all away from the City, and requiring circuitous navigation). Again, these roads can be complicated by narrow lanes, parking bays, commercial vehicle traffic or loading or unloading or high pedestrian footfall.

The proposal to narrow the carriageway on Gravel Lane is also likely to exacerbate the above effects and the developer's traffic management surveys do not seem to have taken into account the likely effects and problematic pinch-points in surrounding streets.

The developers and City of London Police have taken great care to emphasise the physical security factors as requirements for their design. But given the above, the site itself is an inappropriate place for a main operational base for police vehicles which must perform an essential public service.

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