

Community & Children's Services Committee

Date: **TUESDAY, 15 NOVEMBER 2022**

Time: 3.30 pm

Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members: Ruby Sayed (Chairman) Florence Keelson-Anfu

Helen Fentimen (Deputy Chairman) Alderman and Sheriff Alastair King DL

Joanna Tufuo Abevie Frances Leach

Deputy John Absalom Deputy Natasha Maria Cabrera Lloyd-

Caroline Addy Owen

Munsur Ali Alderman Ian David Luder Jamel Banda Alderman Christopher Makin Matthew Bell Alderman Bronek Masojada James Bromiley-Davis Timothy James McNally

Anne Corbett Benjamin Murphy

Piper Aaron Anthony Jose Hasan D'Souza

Mary Durcan

Henrika Priest Sophie Anne Fernandes Jason Pritchard

Deputy John Fletcher Naresh Hari Sonpar Deputy Marianne Fredericks Ceri Wilkins

Steve Goodman OBE

Deputy Philip Woodhouse John Griffiths Jørgensen

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> John Barradell Town Clerk and Chief Executive

AGENDA

Part 1 - Public Reports

1. APOLOGIES

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

3. MIDDLESEX STREET ESTATE - AREAS OF CAR PARK AND SIX SHOP UNITS

Joint report of the Chamberlain, City Surveyor and the Director of Community and Children's Services.

Please note non-public appendices at agenda item 6.

For Decision (Pages 5 - 74)

4. MIDDLESEX STREET ESTATE - ALLOCATION OF FUNDS FOR HOUSING PURPOSES

Report of the Chamberlain.

Please note there non-public appendices at agenda item 7.

For Information (Pages 75 - 78)

5. **EXCLUSION OF THE PUBLIC**

MOTION - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part I of Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-Public Reports

6. MIDDLESEX STREET ESTATE - AREAS OF CAR PARK AND SIX SHOP UNITS - APPENDICES

Non-public appendices in respect of Agenda item 3.

For Decision (Pages 79 - 128)

7. MIDDLESEX STREET ESTATE - ALLOCATION OF FUNDS FOR HOUSING PURPOSES - APPENDICES

Report of the Chamberlain.

For Information (Pages 129 - 172)



Agenda Item 3

Committee:	Dated:
Community and Children's Services	15 November 2022
Capital Buildings Board	16 November 2022
Subject:	Public
Middlesex Street Estate – Areas of Car Park and Six Shop Units.	
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	4, 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	Y
Joint Report of:	For Decision
Clare Chamberlain, Interim Executive Director	
Community & Children's Services	
Paul Wilkinson, City Surveyor	
Report authors:	
Paul Murtagh	
Assistant Director Housing & Barbican	

Summary

The purposes of this report are:

Community and Children's Services Committee

To consider whether areas in the car parks and the six Gravel Lane shop units proposed for non-housing use at the Middlesex Street Estate (together called the "**MSCP**" broadly shown edged red on the Plans annexed to this report), are no longer required for housing purposes, and may be appropriated for other use.

The report includes responses from estate-wide consultation carried out on the issue and advises that the areas are not required for housing purposes for the next 20 years subject to a capital sum for housing purposes

Capital Buildings Board

To consider the appropriation of the MSCP to police purposes and to consider, at its discretion, the ring-fencing of a capital sum for housing purposes following appropriation.

Recommendations

The **Community and Children's Services Committee** is asked to:

 Note the outcome of the recently completed consultation process on the Middlesex Street Estate.

Page 5

- 2. Agree that (subject to the agreement to Recommendations 5 & 6):
- 2.1 The six **shop units** (shown within the MSCP on the Plans annexed to this report) proposed for non-housing use at the Middlesex Street Estate are not required for housing purposes for a period of 20 years from the date of resolutions, in accordance with Recommendations 4 & 5. At the end of the 20-year period, unless a further appropriation is agreed by the City of London Corporation (the City Corporation) in its capacity as a housing authority, the MSCP will revert to its normal use for housing purposes.
- 2.2 The areas of **car park** shown within the **MSCP** on the plans annexed to this report, proposed for non-housing use at the Middlesex Street Estate, are not required for housing purposes for a period of 20 years from the date the Relocation and Consolidation Works are completed (as described at Paragraph 27).
- 2.3 At the end of the 20-year period, unless further appropriations are agreed by the City Corporation, in its capacity as housing authority, the MSCP areas described at 2.1 and 2.2 will revert to their normal use for housing purposes
- Instruct the Comptroller and City Solicitor to prepare a Memorandum of Appropriation in accordance with Recommendation 2, to be placed on the Middlesex Street Estate Deed Packet as soon as any appropriation has taken effect.
- 4. Agree that the Finance Committee, as an independent Committee, will make a recommendation on the 'capital sum' that can be ring-fenced for housing use, in respect of the appropriation of the MSCP, to the Community and Children's Services Committee for its agreement.

The **Capital Buildings Board** is asked to:

- 5. Agree to appropriate the MSCP to police purposes upon Recommendation 2 taking effect.
- 6. Agree that despite there being no legal nor audit reason to do so, if the Community and Children's Services Committee requires a capital sum as a condition of the surplus resolution, then a capital sum can be ring-fenced for housing use, its expenditure to be determined by the Community and Children's Services Committee (the sum to be recommended by the Finance Committee to the Community and Children's Services for approval).

Main Report

Background

Middlesex Street Estate

1. The Middlesex Street Estate land was acquired between 1879 and 1964 for social housing, under Improvement Orders and a Compulsory Purchase Order¹ made under the Housing Act 1957. As such, the land is held for housing purposes by the City Corporation in its capacity as a housing authority.

¹ City of London (Middlesex Street Estates @6 1964

- 2. Where land is held for housing purposes by a housing authority, the land may only be used for providing buildings or land for housing purposes, certain ancillary purposes, shops, recreation grounds and, with the Secretary of State's prior consent, other purposes beneficial to the housing occupiers of the land².
- 3. Where land, which has been acquired for one purpose, is not required for that purpose, it may be appropriated (permanently or temporarily) for any other purpose for which the City Corporation is authorised to acquire land.³

Eastern Hub

4. The City Corporation (in its capacity as police authority/promoter of the proposals) is exploring the potential to redevelop parts of the Middlesex Street Estate's basement, ground-floor, and first-floor car parks and, six retail units along Gravel Lane (together referred to in this report as the "MSCP"), to provide an operational base for the City of London Police (CoLP) in the East of the City of London. This is to be complimentary to the new police premises at Salisbury Square both, to ensure capacity for the CoLP functions and to ensure a continued police presence in the eastern part of the City. There has been liaison with the City Corporation in its capacity as housing authority, as to whether this land is required for housing purposes, and if not, whether it could be appropriated to police purposes. Any appropriation to police purposes is a matter for the Capital Buildings Board, evaluated at Paragraphs 31 to 33.

Context for consideration of police use of the MSCP

- 5. Whether or not the **MSCP** is required for housing purposes, in the light of the current extent and nature of its use, is the prior and prime question for the Community and Children's Services Committee, which is evaluated at **Paragraphs** 6, 7 8 and 26 to 30.
- 6. In the long term, there is the potential for the estate-wide redevelopment of the Middlesex Street Estate, for example, should the dwellings on the estate reach the end of their life and require replacement with new dwellings. At that stage, it is likely that all the land currently held for housing purposes, would be required to facilitate redevelopment for housing purposes (and potentially to allow for additional dwellings, given current and foreseeable demand for affordable housing). However, no such measures are envisaged or considered feasible in the medium term, noting the significant disruption that would be caused and the extensive lead in time that would be required to develop, fund, and implement any such proposals
- 7. In the short and medium term, parts of the estate car park are either unused or underused, resulting in maintenance costs to the HRA (and ultimately to tenants) from which no benefit is being derived for estate residents. The six shop units are not considered to serve a housing purpose. The evaluation as to whether these areas are required for housing purposes is set out below.
- 8. Access to the area proposed for police use would be through the ground floor service yard. This would be shared between residents, commercial tenants, and the police, if agreed by the Community and Children's Services Committee. The

² S.12 Housing Act 1985

³ S.12(1) City of London (Various Powers) Act 1949 Page 7

arrangements for sharing access would also need to be agreed by the Community and Children's Services Committee.

Consultation on whether the MSCP is surplus to housing purposes

- 9. The City Corporation (through its Department of Community and Children's Services) carried out consultation to seek the views of the residents, commercial tenants, and other stakeholders of the Middlesex Street Estate, as to whether those areas of the basement, ground-floor, and first-floor car parks and, the six retail units along Gravel Lane, proposed for non-housing use are still required for housing purposes.
- 10. Comm Comm UK, a specialist planning, licensing, and infrastructure communications agency, was appointed by the City Corporation to provide assistance and support during the consultation process and, with the collation of, and response to community and stakeholder feedback. As part of its commission, Comm Comm UK has produced a Consultation Summary Document, which is attached to this report at Appendix 'A'.
- 11. The Consultation ran from 4 July to 31 July and included a public consultation meeting, that was held at the Artizan Street Library on 12 July. In addition to this, the consultation process included printed information hand delivered to all residents and commercial tenants on the Middlesex Street Estate, online information and submissions through a dedicated project website, emails, and telephone calls.
- 12. The consultation process generated significant interest and resulted in the following:
 - 23 residents and commercial tenants attended the public consultation meeting on 2 July.
 - 30 online survey responses were received from residents.
 - 3 online survey responses were received from commercial tenants.
 - 9 paper survey responses were received.
 - 1 telephone call was received.
 - 10 emails were received.
 - 97 visits were made to the website including, 80 unique visitors and 98 page views.
- 13. As Members will appreciate, the Consultation was intended to deal solely and specifically with the surplus space and potential change of use for the space for non-housing purposes. The consultation was not intended to deal with the City Corporation's proposal for an extension of the CoLP's occupation of areas within the Middlesex Street Estate. However, given that residents and commercial tenants are aware of the proposal relating to the CoLP, it was understandably inevitable that they were keen to know more about the proposal and, were frustrated to be told that this was not part of the consultation process, and no additional information was available at this stage. It is envisaged that if the proposals relating to the CoLP advance, they will be subject to separate consultation by those promoting the proposals, including as part of any planning application process.

- 14. As can be seen from the appended Consultation Summary Document, the key topics, issues, and recurring themes raised by residents, commercial tenants and Members were:
 - loss of car parking spaces, garage spaces, storage spaces.
 - do not support police use.
 - new facility blocking/changing/restricting access.
 - disruption caused by police activity/vehicles.
 - loss of Gravel Lane business community.
 - lack of information.
 - car park security.
 - possible alternative use for the space.
 - benefits to residents.
 - elderly/disabled access considerations.
- 15.On 12 August 2022, we wrote to all residents and commercial tenants of the Middlesex Street Estate advising them of the outcome of the Consultation by way of a Resident Response Document prepared by our communications consultant, Comm Comm UK. The Resident Response Document forms part of the Consultation Summary Document appended to this report.
- 16. Although, we were unable to answer questions directly related to the proposal concerning the CoLP's occupation of the Middlesex Street Estate, we were able to provide assurance to residents on several matters including:

Loss of parking space, garage, and storage space

17. Whatever the future use of the potential surplus space, there will be no reduction in the number of parking spaces, garage and storage spaces required for residents and visitors.

Provision of cycle spaces, cycle storage and electric vehicle (EV) charging points

18. Whatever the future use of the potential surplus space, there will be no reduction in available cycle and storage space. In relation to EV charging points, we are currently working on a bid for funding to enable the installation of EV charging points across all our housing estates including the Middlesex Street Estate.

Provision of disabled car parking and access to the car parks

19. Whatever the future use of the potential surplus space, the City Corporation would need to develop an appropriate parking strategy to ensure the practical needs of vulnerable residents, as well as businesses, visitors and service vehicles are met. In addition, the City Corporation must ensure it continues to meet its legal obligations in relation to the provision of disabled parking bays and access to car parks.

Reliability of the ANPR system and security gates

20. These are current and legitimate concerns and, whilst it is correct that the ANPR and gates/shutters to the car park entrances have failed regularly over the last three years, this has been due in part to vandalism and vehicle accidents. We are

looking at ways in which we can 'future-proof' the entrances to avoid lengthy repair and maintenance times.

Changing access routes or, restricting access to lifts, stairs, and car parks

21. Although these questions related directly to the proposal around the CoLP, we confirmed that if, areas identified in the car parks and ground-floor service yard proposed for non-housing use at the Middlesex Street Estate are indeed declared surplus for current housing purposes, the remaining space will be considered suitable and sufficient to maintain access routes for residents to lifts, staircases, and car parks without adverse impact on equalities.

Access to and, condition and maintenance of the podium

22. Irrespective of any decision taken in relation to the proposal for alternative use, the issues of water leakage and falling masonry on the podium are being addressed as part of the City Corporation's Housing Major Works and Repairs and Maintenance Programmes. In addition, the podium space is not included in those areas that are being considered as potentially surplus. Any future proposal for the use of surplus space will not be considered if it leads to restricted access to the podium.

Alternative use for the car park space whether that be for social housing, community use or other commercial use

- 23. The City Corporation has considered alternative uses for the space in the past. The proposal to convert the first-floor car park into commercial office space was a 'time limited' offer that has subsequently fallen away. Progressing that offer would have required the permanent disposal of the space in the first-floor car park which, at the time, was not something the City Corporation wished to pursue.
- 24. The proposal to convert the space into social housing was also explored, but as the first-floor car park does not benefit from any natural light, any accommodation built into the space would have to be built upwards, thereby preventing future access to the podium garden for residents. For this reason, it was discounted.
- 25. Proposals to develop surplus space in the Middlesex Street Estate for housingrelated community use has been considered in the past. Some short-term projects were implemented but these were limited and ultimately did not last. There have been no other tangible sustainable proposals put forward to suggest that this is a viable proposition.

Evaluation of whether the MSCP is Surplus to Housing Purposes

26. Having considered all relevant matters, analysed the views and feedback from residents, commercial tenants, and other stakeholders, and taken into account all such views and feedback, officers are satisfied that the areas in the car parks, ground floor service yard and the six Gravel Lane shop units proposed for non-housing use at the Middlesex Street Estate are no longer required for housing purposes, for the reasons set out below:

Car Park Areas.

27. There are significant areas of car park space which are currently either unused or underused. The development of the underused areas to provide dwellings was explored and discounted due to lack of light, as set out at **Paragraphs 23 to 25**. There will be no reduction in the overall space currently occupied by car parking spaces (including disabled spaces), cycle storage, and other storage. It is anticipated that all those estate residents requiring car parking spaces and, currently having spaces on the ground floor will continue to do so. The area which would still be available for car parking, cycle storage, other storage and potentially EV charging points, are considered sufficient to meet all anticipated future needs during the 20-year appropriation period. All relocated spaces will be moved to equally accessible areas of the car park. The proposed Relocation and Consolidation Works to re-provide all relevant facilities required by residents in a reduced car park area, are provisionally shown on the Plans annexed to this report and, and no appropriation would take effect until this work is completed.

Six Retail Units

28. The shops were originally provided under housing authority powers to provide services of benefit to tenants with a view to providing community facilities and ensuring a range of services were available for estate residents. This was historically achieved by restricting and controlling goods sold from each unit, but this led to disputes about lease terms and significant management resources. It was acknowledged that this approach had fallen out of step with competition law and that enforcement could be problematic, Your Committee therefore adopted a revised approach in 2017 and, ceased imposing user restrictions aimed at providing a range of essential services for tenants. In addition, it is noted that online purchasing habits have increased and that a range of services are generally available in convenient locations in the neighbourhood. As a result, the link between the use of the units and the needs of estate residents has eroded such that the units are no longer considered to relate to housing purposes. The units are currently used as follows:

Unit	Business Type	Service Users
8 Gravel	Sale of Mobile phone accessories	Mix of retail and wholesale.
Lane		Business said to be affected by local
		parking restrictions.
10 Gravel	Sale of Fancy Goods including	Mainly wholesale.
Lane	vaping supplies	Business said to be affected by congestion
		charge.
12 Gravel	Vacant	None.
Lane		
14 Gravel	Brass band musical instrument	Professional musicians and music students.
Lane	sales	
16 Gravel	Printing services	Retail.
Lane		
18 Gravel	Hairdresser	A significant proportion of users were
Lane		stated to be office workers and post covid
		WFH has reduced customer base.

29. Due to the nature of the businesses and service user base, and the availability of on-line services and local services for residents conveniently located elsewhere in the neighbourhood, it is not consequently that the above units are required for

- housing or ancillary purposes. It is also not considered that estate residents, including residents with protected characteristics, would be adversely affected were the businesses to be relocated further away. No adverse impacts for residents have been identified by residents through the consultation process.
- 30. If the retail units are agreed to be surplus to housing use, future arrangements regarding the units will no longer be a matter for the Community and Children's Services Committee but, following an appropriation to police use, will be a matter for the Capital Buildings Board. However, it is likely that retail units at the Middlesex Street Estate which are currently vacant, will be considered for use to accommodate any of the tenants seeking relocation in the vicinity. The City Surveyor's report to the Capital Buildings Board, entitled 'Proposed Eastern Base for CoLP Vacant Possession Strategy', is included as a **Non-Public Appendix** to this report.

Corporation's Proposal Relating to the CoLP

- 31. Subject to the Community and Children's Services Committee's agreement that the **MSCP** is no longer required for housing purposes, it is proposed that the **MSCP** be appropriated to police purposes by Capital Buildings Board to enable the proposed provision of the Eastern Hub element of the police accommodation project. Not only would this meet an accommodation need in the vicinity for a key emergency service, but it would also ensure the efficient use of General Fund land, avoiding underuse and maximising public benefit. The Capital Buildings Board, through its delegated officers, will be responsible for public consultation regarding the police proposals and the related planning application. It is anticipated this will take place later this year/early next year and will be the subject of separate reports to Capital Buildings Board.
- 32. There is no strict legal or accounting requirement for any capital allocation to be made in respect of an appropriation from one General Fund purpose to another. However, it is considered appropriate to have due regard to earlier proposals for part of the car park to be commercially let, the saving to the police accommodation budget of using land already owned by the City Corporation, the urgent need for works to the podium at the Middlesex Street Estate and, the wider interest in ensuring any proposed police use is successfully integrated into the local community and operates in the spirit of mutual consideration and co-operation between residents and the CoLP. As such, the allocation of a sum to be agreed for housing purposes at the Middlesex Street Estate is considered appropriate by the Department of Community and Children's Services. To assist in determining the sum to be agreed, an independent external valuation of the MSCP has been commissioned and it is proposed that the sum to be agreed be informed by this valuation. The independent valuation is included as a **Non-Public Appendix** to this report.
- 33. In terms of taking the Eastern Hub proposal forward, no dates have yet been set; however, it is intended that there will be two public events to support the wider planning consultation process. It is expected that these two public events and the wider planning consultation process will address many of the questions asked by residents and commercial tenants about the proposals. This consultation will not be carried out by the Department of Community and Children's Services, but by the City Corporation as promoter of the alternative proposals under the remit of the Capital Buildings Board. There will be opportunity for liaison and input between the

promoter and estate residents as well as the Department of Community and Children's Services.

Financial Implications

34. Income:

The appropriation of the **MSCP** will result in all expenditure and income attributable to those areas being accounted for in the General Fund and not the HRA.

35. Capital:

There is no strict legal or accounting requirement for any capital allocation to be made in respect of an appropriation from one General Fund purpose to another. However, the considerations in Paragraph 32 should be noted.

36. It is envisaged that the capital sum ring-fenced in the General Fund for housing purpose, would be a re-allocation of General Fund, as part of the previous agreement to a £5million bridging loan from City Fund on the basis that the HRA re-prioritises, or sweats is assets.

Legal Implications

- 37. The City Corporation has power to appropriate land (either permanently or temporarily) from the purpose for which it was acquired, to another statutory purpose, subject to it being no longer required for that purpose for which it was acquired⁴.
- 38. Where land is appropriated temporarily, at the end of the appropriation period it will revert to its former statutory use in this case for housing purposes (unless a further appropriation is resolved by the housing authority).
- 39. Appropriations, including all their terms and the basis on which appropriations have taken place, are recorded in a Memorandum of Appropriation which is placed on the Deed Packet.
- 40. All other legal implications are contained in the body of this report and its footnotes.

Equalities Implications

- 41. At this stage, there are no equalities implications arising out of this report. Whatever the future use of the potential surplus space, the City Corporation must ensure it continues to meet its legal obligations in relation to the provision of disabled parking bays and access to car parks.
- 42. For any future use of the potential surplus space, an Equalities Impact Assessment will be carried out to ensure that City Corporation continues to meet its statutory obligations.
- 43. If the areas identified in the car parks and ground-floor service yard proposed for non-housing use at the Middlesex Street Estate are indeed declared surplus for current housing purposes, the remaining space will be considered suitable and sufficient to maintain access routes for residents to lifts, staircases, and car parks without adverse impact on equalities.

⁴ Section 12 City of London (Various Powers) Act 1 Page 13

Appendices:

Appendix A: Consultation Summary Document

Appendix B: Plans

Appendix C: Independent Valuation (Non-Public)

Appendix D: City Surveyor's Report - Proposed Eastern Base for CoLP -Vacant

Possession Strategy (Non-Public)

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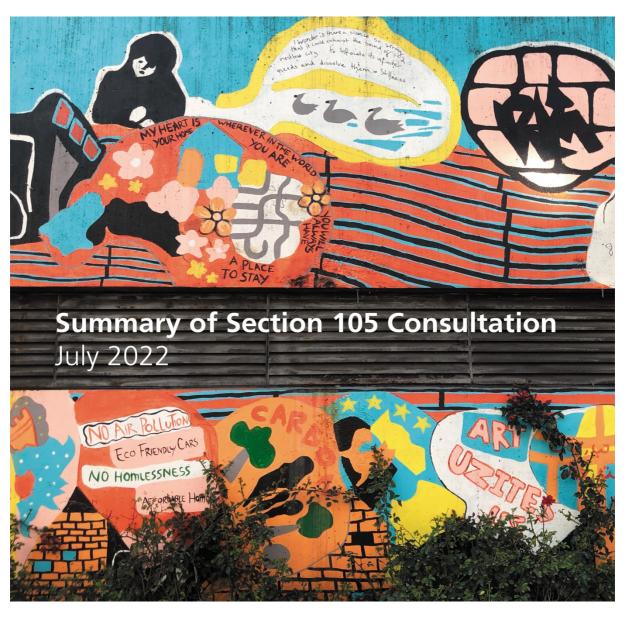




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1. Introduction

This Summary of the Section 105 Consultation has been prepared by Comm Comm UK on behalf of the City of London Corporation (City Corporation) as part of a potential future planning application for the development of parts of the Middlesex Street Estate.

The Middlesex Street Estate, in the Portsoken ward of the City of London, contains 234 flats surrounding Petticoat Square, a landscaped podium area. It was built between 1965 and 1970 and shares the site with Artizan Street Library and Community Centre.

The first-floor car park at the Estate is currently vacant and has been for some years. The access ramps have been removed and the space is inaccessible to residents.

The basement car park, in addition to residents' parking, contains a secure vehicle compound, which has been in use by the City of London Police since 2020, for the storage and maintenance of police vehicles.

A proposal has been in development since July 2021 for a much larger operational base for the City of London Police (the Eastern Base) to be constructed in parts of the basement car park, ground floor service yard, vacant first-floor car park, and in six shop units on Gravel Lane.

Before a planning application and associated planning consultation for the Eastern Base proposal can take place, the City Corporation has a legal obligation under Section 105 of the Housing Act (1985) to consult with its secure tenants to determine whether surplus space at the Middlesex Street Estate is still required for housing use. Additionally, the City Corporation wanted to determine whether the construction of the Eastern Base would unduly negatively impact resident's access to amenity space and access routes within the Estate, and commercial tenant's businesses.

It was decided therefore that the City Corporation should consult with all residents and commercial tenants of the Middlesex Street Estate in preparation for progressing the Eastern Base project.

Comm Comm UK, a specialist planning, licensing and infrastructure communications agency, is the author of this Section 105 Summary document and was appointed by the City Corporation to provide assistance and support during the consultation process, and with the collation of and response to community and stakeholder feedback.

Public and stakeholder consultation for the Section 105 Consultation began in early July 2022 and took place over 4 weeks. The consultation included a public event and the City Corporation was keen to collect as much feedback as possible from residents and commercial tenants, to find out how the proposed development may affect them.

Consultation was conducted in person at a public event, via printed materials hand delivered to all residents and commercial tenants, via online submission through a dedicated project website, via email and phone calls.

The aim of the consultancy process was to ensure that any future development is guided by feedback from the local community; that the City Corporation can meet and maintain the needs of residents and businesses alike, and ensures that the construction of the Eastern Base does not unduly negatively disrupt the lives of its potential future neighbours.

2. Overview of Methodology

The overall strategic aims of the engagement were to:

- Ensure residents and commercial tenants were fully aware of and understood the scope of the Section 105 Consultation
- Collect and review feedback provided by the community about how any potential development may affect them
- Address questions and potential objections to the proposals, including construction and security concerns
- Establish strong lines of communication with the local community
- Take feedback from residents and businesses into account, to aid the City Corporation in determining whether the proposed areas for development are indeed surplus to housing need.

2.1 Stakeholders

As part of the engagement, the following stakeholders were invited to engage in the process and have been kept informed of the plans.

Portsoken Ward councillors and Members:

Marianne Fredericks - Chair of Housing Management and Almshouses Sub Committee
Tim McNally - Deputy Chair of Housing Management and Almshouses Sub Committee
Ruby Sayed - Chair of Community and Children's Services Committee
Helen Fentimen - Deputy Chair of Community and Children's Service Committee
Henry Jones - Portsoken Ward Councillor
Jason Pritchard - Portsoken Ward Councillor
John Fletcher - Portsoken Ward Councillor
Munsur Ali - Portsoken Ward Councillor
Prem Goyal - Portsoken Ward Councillor
Mary Durcan - Community and Children's Services Committee

All Commercial Tenants of the Middlesex Street Estate

All Residents of the Middlesex Street Estate

2.2 Consultation Format

Public and stakeholder consultation for the Section 105 Consultation began in early July 2022 and took place over 4 weeks. The consultation included a public event and the City Corporation was keen to collect as much feedback as possible from residents and commercial tenants, to find out how the proposed development may affect them.

Consultation was conducted in person at a public event, via printed materials hand delivered to all residents and commercial tenants, via online submission through a dedicated project website, via email and phone calls.

3. Consultation Timeline

The project team has undertaken a robust consultation in accordance with the legal obligations of the City Corporation under Section 105 of the Housing Act (1985)

Date	Activity
2 July 2022	All residents and commercial tenants of Middlesex Street Estate received an introductory information letter, a questionnaire, Freepost envelope and preliminary floor plans through the post. www.mse-project.co.uk goes live
4 July	Section 105 Consultation begins. Members receive consultation materials via email
12 July	Public Event at the Artizan Street Library, 4-7pm
31 August	Consultation period ends
11 August	Members received Resident Response document via email
12 August	All residents and commercial tenants of Middlesex Street Estate received a letter and Resident Response document through the post
16 August	Project website updated with text and Resident Response document

4. Consultation Materials

The following section details the materials used in each stage of the consultation.

6.1 Residents and commercial tenants mail-out

On 2 July, all residents and commercial tenants of Middlesex Street Estate received a handdelivered introductory information letter, questionnaire and floor plans of the proposed area for development.

The letter made people aware of the purpose of the Section 105 Consultation, invited them to a public exhibition at the Artizan Street Library, invited them to submit their feedback online or by post, and directed them to the dedicated project website, www.mse-project.co.uk

Also enclosed was a questionnaire and Freepost envelope, and some basic plans of the proposed basement, ground floor and first floor layouts of the development.

Copies of all of these documents can be viewed at Appendix A

6.2 Website

The dedicated project website can be viewed at www.mse-project.co.uk.

It went live on 2 July 2022 and initially contained the text of the introductory residents' letter, a page for viewing the floor plans showing the areas of proposed alternative use, and a page for the questionnaire, which could be filled in and submitted online.

Contact details for the project team, including a phone number, Freepost address and dedicated project email address can also be found here.

The text on the website changed once the consultation closed and the online questionnaire was disabled to prevent any further submissions beyond the end date of the consultation.

The text changed again on 15 August once the response document was issued to residents on 12 August. It mirrors the text of the letter residents and commercial tenants received on that date, and also includes the Residents' Response document.

To date, the website has been visited 97 times by 80 unique visitors.

Images from the website are available to view at Appendix B

6.3 Exhibition

A public exhibition was arranged on 12 July at the Artizan Street Library. There, six exhibition boards were available for residents to view. Two representatives from the City of London's Department of Community and Children's Services were in attendance, along with two representatives from Comm Comm UK and a representative from Middlesex Street Estate Management. 23 residents and commercial tenants also attended.

Images of the exhibition boards can be viewed at Appendix C



Fig. 1: A-Board poster advertising the public event

Fig. 2: The A-Board in-situ outside the library

7. Feedback Received

The Section 105 Consultation period ran from 4 July to 31 July 2022. It generated a total of 53 pieces of individual feedback.

- 23 residents and commercial tenants attended the 12 July public meeting
- 30 online survey responses were received from residents
- 3 online survey responses were received from commercial tenants
- 9 paper survey responses were received
- 1 phone call was received
- 10 emails were received
- There were 97 website visits, including 80 unique visitors and 98 page views

The following section contains a breakdown of all feedback the project team has received to date through the project website, emails, phone calls and on paper.

The feedback has been separated into the key topics, issues and recurring themes raised by residents, commercial tenants and Members.

Loss of car parking spaces, garage spaces, storage spaces

- Do not support police use
- New facility blocking/changing/restricting access
- Disruption caused by police activity/vehicles
- Loss of Gravel Lane business community
- Lack of information
- Car park security
- Possible alternative uses for the space
- Benefits to residents
- Elderly/disabled access considerations

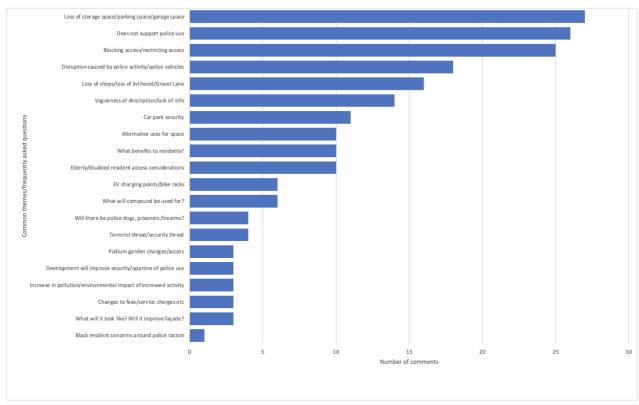


Fig. 3: Chart showing the numbers of comments made by Members, residents and commercial tenants around common themes.

7.1 Loss of car parking spaces, garage spaces, storage sheds:

By far the most common concern shown by residents was surrounding loss of their car parking spaces, garage spaces and storage spaces, and whether these would be re-provided and accessible once the new compound is constructed. Some of the comments made include the following:

- I am concerned about the new accommodation on the first floor as this area is where residents currently have a shed...I have worries that these sheds would also be taken over by the police compound or become harder to access, leaving residents without the use of this amenity.
- Will garages be re-instated as before?
- Will all those that had a garage get a garage again?
- Will the shed be kept by residents?

7.2 Does not support police use:

Residents in the main do not enjoy the police presence among them and expressed concerns that there will be more disturbance, disruption, pollution and noise if a more permanent base is constructed. Some feedback included the below comments:

- This is a residential estate and it should not be allowed.
- This is a residential property, is it appropriate to convert to a police station?
- I do not agree with this proposal. It should stay as a Housing Estate not be used for Police as this will cause problems and could possibly make the Estate a target for Terrorist attacks
- This is primarily a housing estate, so invest and prioritise in your housing and associated amenities first.

7.3 New facility blocking/changing/restricting access:

Many concerns were raised surrounding the issue of access, whether that be for refuse collection, stairwells and lift, access for service and delivery vehicles, access by disabled or elderly residents to their storage and car parking spaces. See below comments for more information:

- Since the police is using the garage there is much more noise and a lot of vans parked around the state [sic]. Some of them near the Travelodge, leaving no space available for couriers and therefore sometimes they are not able to deliver
- Building a police compound would restrict resident access to certain areas of the estate and this would inconvenience the residents and block passage to walkways.
- Will all current access routes between flats and car parking spaces and garages continue to be available for the use of residents?
- It is highly likely that the creation of this new police compound which is proposed to stretch over three floors will massively limit access to areas of the estate to residents and other persons.

- We would have to walk all the way round the balconies to go to the basement what
 is worse we will have to come up from basement carpark in lift number two with a
 weekly shop etc and walk all around the balconies to (our home) which is furthest
 away from lift number 2 now on more general note people moving in and out will
 have a problem also deliveries walking down the sides of the compound likewise
 rubbish removal [sic]
- Will there be any changes to the waste and recycling facilities available for the use of residents?
- Will existing facilities for residential and shop services: i.e. recycling bins, large item disposal, cleaners' cage, be affected by the proposed changes or remain in the same place in the ground floor car park?
- The proposed [Ground Floor] plan seems to leave very little room for business vehicles to turn around at the Middlesex Street and Gravel Lane end servicing the shops on that side. How will this be achieved?

7.4 Disruption caused by police vehicles/police presence:

Residents are disrupted by police vehicles on-site and are concerned about more/further disruption in the future. Some comments expressing concern over this issue below:

- What is the mitigation action of City of London Police adopt [sic] for noise, sirens, and impact on the residents?
- Residents have not received deliveries because police vehicles parked at the
 entrance of the estate building parking facility have prevented delivery vehicles from
 entering the building. Also, the police use of canines has caused noise disruption as I
 have heard barking during the day and night. In the new police compound, there
 could be several more disruptions that are not being communicated to the residents
- The police area on the estate causes problems...with the fans and alarms.
- Since the Police have been in the basement, there is a constant drop off and
 collection of Police vehicles by transporters. This in itself, should not be an issue but
 Artizan Street where the transporter's drop off and collect is effectively a tunnel with
 buildings on both sides. This, plus the road's construction means that Petticoat
 Tower vibrates whilst the engines are running. This is not to mention the debacle of
 the basement alarms and fans that meant that the fire brigade was constantly
 attending, and residents had to endure hours of disturbance night and day.
- The simple task of installing the Police in the basement caused huge upset and disruption and ongoing issue. This project is much larger and will cause far more disruption and ultimately more traffic on the estate.
- Police vehicle alarms!!!!! Noise from Police vehicles going in/out

- We do not want the police here. There is no place to park around the estate because
 of their vans. Couriers to the tower cannot park and make deliveries because the
 police leave their vans around the entrance to the state, close to the Travelodge.
 And thy make a lot of noise.
- Terrible. Since the police is using the garage there is much more noise and a lot of vans parked around the state [sic]. Some of them near the Travelodge, leaving no space available for couriers and therefore sometimes they are not able to deliver

7.5 Loss of shops/business community on Gravel Lane

Commercial tenants on Gravel Lane are very concerned about what will happen to their premises and businesses. Feedback included the below:

- I strongly disagree with the proposal of the police taking over Gravel Lane car parks and closing several shops. I think it's extremely unfair and showing a total lack of respect to the tenants especially after covid.
- How are shop owners on Gravel Lane to be compensated?
- The plans to develop and change the use of our retail unit are causing my staff and I a fair amount of stress.
- The retail units provide street level business which the City supports.
- To be forced out of our retail store is a potential disaster for our business... This news comes as a shock and a blow following the last few difficult years.
- We are not happy with the proposal. The Middlesex St area already has a very low number of shops and businesses and the proposal aims to take away a third of the current businesses on the estate. London already has a huge problem with shops and businesses closing down and this will only further exacerbate it.
- What support will be given by the City for commercial tenants who are being forced to move?
- Relocation would result in a huge loss of goodwill and be a very expensive endeavour

7.6 Car park security

Many residents are concerned about security in the basement car parks; the function of the ANPR system and security gates has recently been unreliable and some of the feedback comments below reflect this concern:

- Moving the residential parking lot to the basement is a poor decision. The basement
 has weak phone reception, which may be problematic if someone had to make an
 emergency call.
- Since the Police moved into the basement car park, we have had to endure the basement car park gate / shutters being out of action (4 5 months in 2021, 4 months so far this year). This has resulted in a far less secure parking area than before, whereas we were told that having the Police in situ would be safer for us
- If the compound is being removed will there be a guarantee that the gate / shutter works at the ramp entrance?
- Some residents are scared to use the basement as it is unsafe due to lack of security, so will they be offered ground floor car parking?
- New residents car park in basement safety issues owner walking to/from their vehicle, especially for women and at night.
- Safety and security, both due to police presence now (car park barriers and lack of security mean drug use and theft happening in car parks, despite police presence) and in the future.
- Would the same or similar automatic number plate recognition systems (ANPR) and gates (which have regularly and consistently failed over the past three years) be in operation for car park facilities for both residents / visitors and police? If not, what changes do you envisage to ensure security for both residents and commercial tenants on the Estate?
- How the undercroft, which already feels unsafe to my teenage children, could be made to feel safer, rather than creating badly overlooked tight spaces and corridors and inert frontages through the proposed spatial divisions, which will make the space less attractive, less safe, and less secure.

7.7 Alternative Uses for the Space

Many residents are alive to the possibility that the space could be used for something that could benefit the community. Lots of ideas were shared:

- A youth club for the teenagers, a food bank or housing would be far more suitable
- From an article in the Guardian: "In 2014 the Royal Society of Arts recommended that retail car parks could be used for pursuits like basketball, skateboarding and tennis. They could host temporary skating rinks, climbing walls and fun fair rides or even shipping containers in which workshops and courses could be held. Profits from these activities might be be re-invested into local projects."
- Why not consider uses which could benefit the residents and remain as housing?
- I think the estate should remain as housing rather than rented office or car parking spaces, and alternative uses considered for the first floor car park space found as a

- residential amenity e.g. something like a gym or leisure facilities, which residents could pay a small and regular fee to access.
- Could this space not be better used for a Football / Ball cage for residents to remove the noise created by this from the Podium?
- Lots of effort and money spent on this project, why hasn't this much effort been made to engage with local residents and community to create something for the benefit of all?
- What has happened to the proposals to convert the first floor car park into commercial office space for tenants other than the police? Why has usage by police been preferred to this option?
- What consideration has the City given to conversion of any of this space to provide health and leisure facilities to residents, especially children and teenagers?

7.8 Disabled/elderly considerations

Some disabled residents are very concerned about the potential loss of a valuable and accessible storage space in the basement. Some feedback below:

- Another concern we have a garage which we keep our two wheelchairs walking
 frames mobility scooter and a three wheel trike etc which we can load into the car as
 and when needed we have no room in the flat for the said items and even if we had
 it would be difficult to get to the car without the use of lift number 4.
- No concideration [sic] has been given to the elderly and disabled people who live on the estate
- I also have a garage which we need and I think this would mean we would lose it, my mum has walking differculties [sic] and we store her frames etc in the garage
- What provision is there in the plans for disabled parking as a ratio to the number of residents on MSE?

7.9 Positive comments

Three residents think the plans are a positive development:

- We need more police and hopefully it will improve the safety and security for everyone in the area, businesses and residents plus visitors.
- I think it is a good idea.
- My experience of the police using the basement for parking so far has been very positive. It is reassuring to know that there is a police presence and to see officers

come and go at various times. I feel that an expanded police presence as proposed will be beneficial to me as a resident and to the general public who rely on a police presence in the area, able to respond to policing matters in a timely manner by being local

All comments received via hard copy and email can be viewed at Appendix D

7.10 Email received by a leaseholder, resident on the Middlesex Street Estate.

The project team received an email on 6 July from a leaseholder, resident on the Middlesex Street Estate. He wrote as a representative of the residents' association and his email was sent in response to the initial materials sent to all residents and commercial tenants on 4 July. His email was a formal request from the City Corporation for more information about the proposed alternative use of the space at Middlesex Street Estate, as he did not consider the initial materials sufficient to make a proper judgement. He then went on to list a total of 24 questions, as requested by the residents of Middlesex Street Estate.

This email and the questions it contained, along with questions and concerns raised by other respondents, formed the basis of the Resident Response document, which was distributed to all residents and commercial tenants of the Middlesex Street Estate on 12 August 2022.

A copy of the email can be found at Appendix E

8. The Resident Response Document

The scope of the Section 105 Consultation dealt solely and exclusively with the legal obligation to consult with residents about the proposed change of use of the space, and whether the surplus space identified was still required for housing use.

Almost all residents and commercial tenants who gave their feedback wanted to know more information about the proposed use of the space at Middlesex Street Estate and were concerned at the lack of new information. They are also all aware that the current proposal is for the City of London Police to have an operational base constructed for them there.

The City Corporation felt that residents and commercial tenants should receive some feedback following the end of the consultation and an acknowledgement of all the questions and concerns they had raised, even if any response from the City Corporation would not be permitted to answer any question fully or indeed at all, because of the legal requirements of Section 105 or for security reasons.

It was made very clear in the document and letter that further information about the proposal is expected to be made available as part of a planning application and associated planning consultation.

The Resident Response Document and a covering letter was hand-delivered to all residents and commercial tenants on Friday 12 August.

Portsoken Ward Councillors and Members received the document and briefing via email on 11 August.

Copies of the letter, the document and briefing email can be found at Appendix F

9. Conclusion

The City Corporation has undertaken a robust consultation with the residents and commercial tenants of the Middlesex Street Estate. The feedback received will inform the decision to be taken by the City Corporation as to whether the space proposed for alternative use can indeed be judged surplus to housing requirements.

A mixture of online, print and in-person engagement has taken place and respondents have been given the opportunity to respond through various methods: surveys on paper and online and in person, via email and phone call, over a 4-week period.

Overall, the consultation has been successful, having received significant levels of feedback.

However the feedback received has not been in support of the areas being considered as surplus to housing need, with most residents and businesses opposed to the plan for alternative use. This is due, in part, to the nature of the Section 105 consultation and its inability to provide the new information that residents and commercial tenants are seeking. They are therefore not in a position to make a reasoned judgement about the plans for alternative use, but have nonetheless given their feedback about how they think the plans may affect them.

The project team has reviewed, listened and responded to the feedback received and has updated the community by providing all residents and commercial tenants with a response document, which seeks to answer some of the concerns they have raised.

Given that the legal requirements of the Section 105 consultation are solely to determine whether the potential space could be considered surplus to housing requirement, it has not been possible to fully answer local concerns, however more information about the future plans for the space is expected to be made available as part of a planning application and associated planning consultation.

No date for this has yet been decided but is expected to take place later in 2022.

10. Appendices

APPENDIX A

Residents and commercial tenants mail-out 2 July 2022

Department of Community and Children's Services
Andrew Carter



Email: Paul.murtagh@cityoflondon.gov.ul Date: 02/07/22

Dear Resident

Proposal for the change of use of parts of the Middlesex Street Estate's car park and six shop units by the City of London Corporation for the City of London Police.

In accordance with published protocols relating to consultation on matters of housing management, the City of London Corporation (the City Corporation) is obliged to consult with its secure tenants under Section 105 of the Housing Act 1985. In this case, however, we are consulting with all residents of the Middlesex Street Estate and its commercial tenants.

The City Corporation's Department of Community and Children's Services is considering whether the areas proposed for use by the City of London Police are still required for housing purposes. The City Corporation has committed significant resources to improve its social housing estates and seeks to ensure that under-used assets are let, to reduce unnecessary

To take part in the consultation process and have your say, please complete the enclosed questionnaire and return in the FREEPOST envelope, or go to our website www.mse-project.co.uk. Further details can be found at the end of this letter.

The Proposal (please see enclosed plans showing areas affected)

The City Corporation is considering and progressing a proposal for developing parts of the car parks and six shop units at the Middlesex Street Estate.

The proposal is for the City Corporation to develop additional space for the City of London Police, to include the replacement of the existing basement compound with a new, larger compound, located on the basement, ground floor and first floor car park levels and in six shop units along Gravel Lane. The City Corporation proposes to undertake a separate consultation on the planning application for these proposals later this year.

This consultation period will run for 4 weeks, from 4 July to 31 July 2022.

How to have your say

- Included with this letter is a questionnaire and Freepost COMM COMM UK envelope
- You can go to our website to complete the questionnaire:

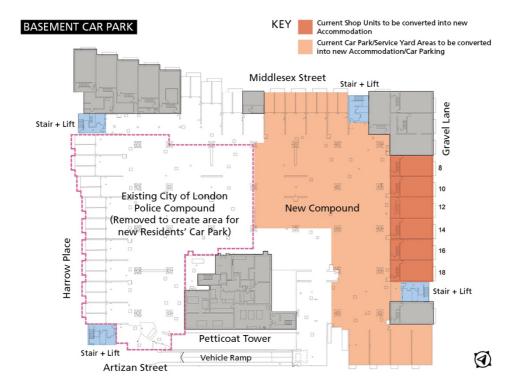
 www.mse.project.co.uk
- You can also come and meet the team in person at a consultation event on 12 July 2022 in the 1st floor studio at the Artizan St. Library, from 4-7pm
- You can call us on 0800 772 0475
- You can email us at hello@mse-project.co.uk

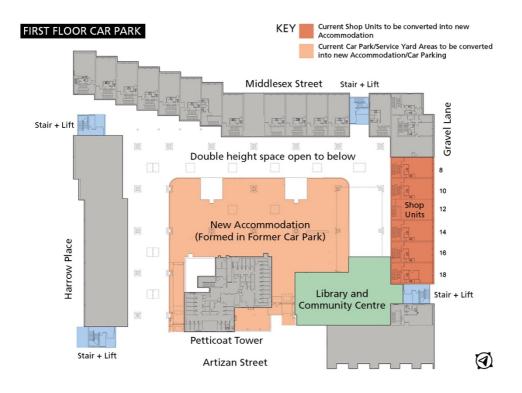
Should you need to do so, please do not hesitate to contact us directly to request this information in an alternative language or format.

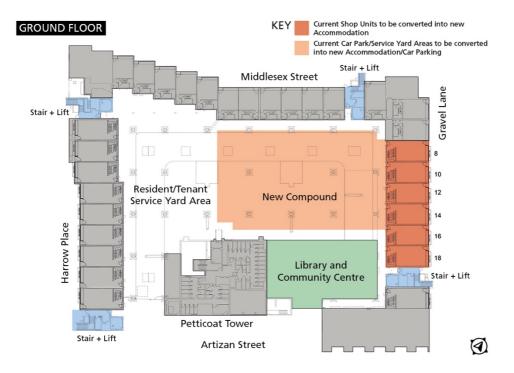
Yours faithfully



Paul Murtagh Assistant Director, Barbican & Housing







Section 105 Consultation Questionnaire



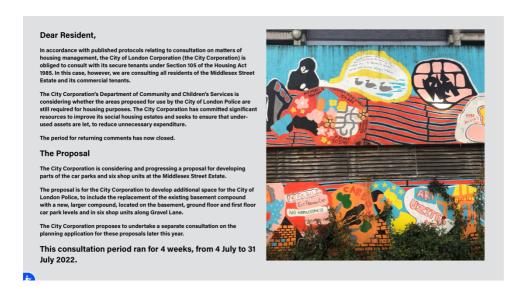
4 July - 31 July 2022

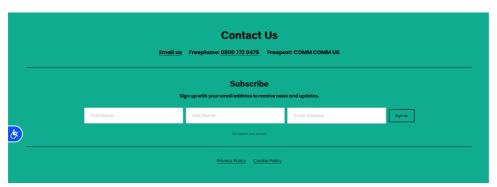
Are you:				
A Resident Commercial Tenant				
What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?				
Please use the enclosed Freepost COMM COMM UK envelope				
to send us your comments.				
Alternatively, you can fill in the questionnaire online at www.mse-project.co	o.uk.			
You can call us on 0800 772 0475. You can email us at hello@mse-project.co.uk.				
Contact us to request this information in an alternative language or format				

APPENDIX B

Images from the home page of the dedicated project website: www.mse-project.co.uk







APPENDIX C

Exhibition boards used at the public exhibition at Artizan Street Library on 12 July 2022







Welcome to the Middlesex Street Estate Section 105 Consultation 4-31 July 2022







The Proposal

The City Corporation is considering and progressing a proposal for developing parts of the car parks and six shop units at the Middlesex Street Estate.

The proposal is for the City Corporation to develop additional space for the City of London Police, to include the replacement of the existing basement compound with a new, larger compound, located on the basement, ground floor and first floor car park levels and in six shop units along Gravel Lane.

The City Corporation proposes to undertake a separate consultation on the planning application for these proposals later this year.

Basement Plan





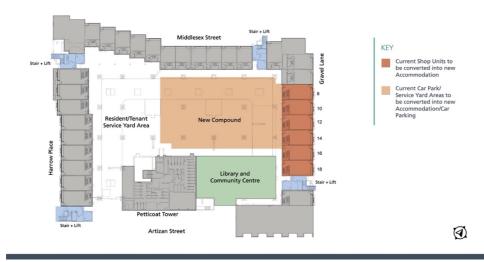




Ground Floor Plan





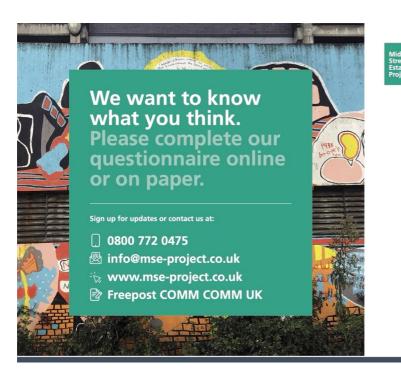


First Floor Plan







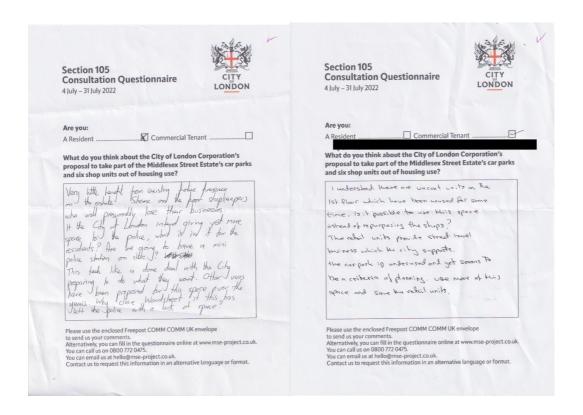


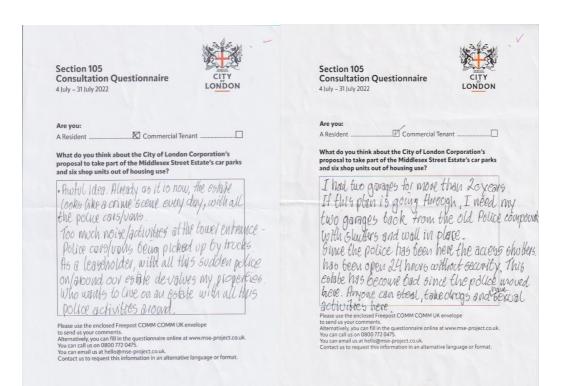


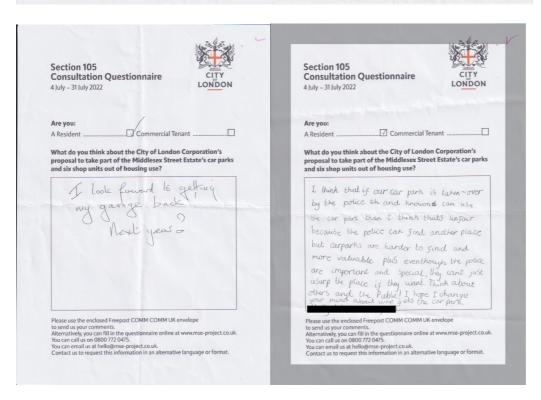


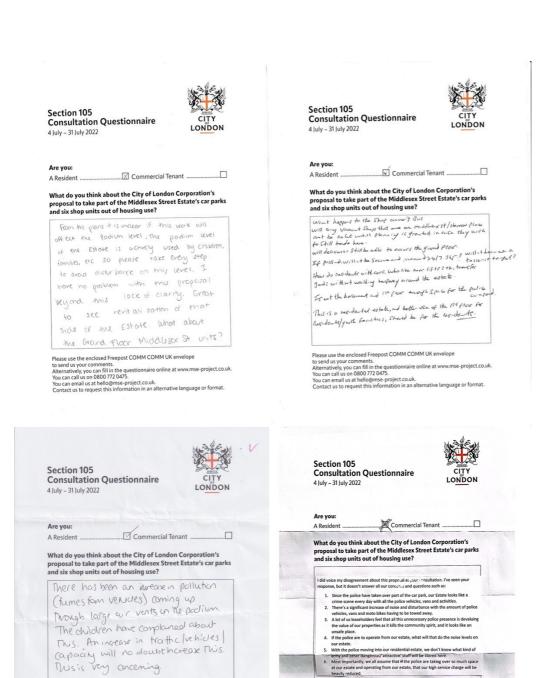
APPENDIX D

Feedback received via hard copy of questionnaire:









Feedback received via online submission of the questionnaire:

02.07.22 Are you: Commercial Tenant

Please use the enclosed Freepost COMM COMM UK envelope to send us your comments. Atternatively, you can fill in the questionnaire online at www.mse-project.co. You can call us on 0800 772 0475. You can email us at hello@mse-project.co.uk. Contact us to request this information in an alternative language or format.

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: We are not happy with the proposal. The Middlesex St area already has a very low number of shops and businesses and the proposal aims to take away a third of the current businesses on the

Please use the enclosed Freepost COMM COMM UK envelope to send us your comments. Afternatively, you can fill in the questionnaire online at www.mse-project.co.uk. You can call us on 0800 77 20475. You can enall us a telhologimse-project.co.uk. Contact us to request this information in an alternative language or format.

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estate. London already has a huge problem with shops and businesses closing down and this will only further exacerbate it.

02.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: Of course we dont want to see under utilitised assets - however it would be good to understand how the above proposed use was decided upon, which factors considered, other options considered if any. My concern initially is for the storage sheds which make living in a small one bedroom flat possible. Will access to our sheds be compromised by this proposal? Another concern is the noise levels of construction which proved so disturbing during lockdown- when others shops refurbished. The noise levels in podium flats can be unbearable when work being carried out, particularly for those on night shift or those working from home. Unfortunately i will not be able to attend on the 12th july in person. Will a zoom link be provided?

04.07.22 Are you: Commercial Tenant

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I object to these plans. Under the proposal we would be evicted from our retail store. Following the closures forced upon us by the pandemic we have only recently returned to normal trading conditions. The business has been damaged but given time it is and will recover well. To be forced out of our retail store is a potential disaster for our business. We are a 70 year old specialist retailer of brass musical instruments. We bring vibrancy and foot fall to the city. We putt on Jazz nights locally at the Bell pub once a month and provide music education opportunities via the Guildhall School of Music and Drama. We enhance the area and until now the City has been supportive of our presence. I find it unlikely that a small shop like ours will be able to fight City Planning. If you decide you want a Police Station, you will have one. The best we can hope for is help from a considerate landlord. To be re homed in a suitable, local premises and compensated for the move. Any new shop will require renovation to suit our specific needs. We spent more than 70K fitting out 14 Gravel Lane only 3 years ago as it was in a very poor state of repair. This news comes as a shock and a blow following the last few difficult years. I would welcome communication from someone within the team to discuss the options that could be open to us should the proposal go ahead. Kind regards,

04.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: Basement Level In the plan drawing the new compound does not appear to be much larger than the old compound so how much extra space is obtained? Is the upheaval for residents just so that the proposed accommodation can be near the compound? Residents have been heavily inconvenienced and forcefully evicted twice from their old parking spaces and garages to make way for the current compound and now they are proposing to do it again. How many more times must the residents be treated as 2nd class citizens and priority given to any outside group?. Why did no-one envisage the need for a larger space when the current compound was designed? How would this be managed or will there be the same shambles as when the ramps were removed and residents previously relocated? Will the new

residents compound be upgraded in any way or are the issues of water leakage from above and falling masonry still a problem? The plan doesn't seem to offer much in the way of space for entrance/exit of residential vehicles. My understanding is that the current Police compound area is owned by the City of London Police, who will be the owners if residents are relocated there? Ground Floor The proposed plan seems to leave very little room for business vehicles to turn around at the Middlesex Street and Gravel Lane end servicing the shops on that side. How will this be achieved? First Floor How can any accommodation built on the old 1st floor car park have enough natural light. With the City of London's history of allowing structures to be built limiting natural light for existing residents is this accommodation to reach above podium level? In summary: As ever the residents come bottom of the pile for the City of London Corporation and this seems to be yet another example. I do not believe any consultations by the City of London change any outcome for which they have already decided the outcome.

05.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I request that the City of London appoints a person to this decision making process who has an interest in making Middlesex Street Estate better. That person would consider - how the undercroft, which already feels unsafe to my teenage children, could be made to feel safer, rather than creating badly overlooked tight spaces and corridors and inert frontages through the proposed spatial divisions, which will make the space less attractive, less safe, and less secure. - how the inadequate current bicycle storage provision could be improved to advocate active travel in line with the City's commitments under the Paris climate accords and numerous subsequent policies, providing attractive, easy to access and safe storage incl repair and washing facilities as on other CoL estates, instead of compromising the provision further. - how to effectively engage with residents who are dependent on their cars for mobility or business reasons, and discuss alternatives such as car club provision on site, a cargo bike scheme, etc. - how post pandemic, Gravel Lane could benefit from a vibrant and active ground floor frontage, possibly taking Benk&Bo as an exemplar, rather than introducing a predominantly inert facade, which would detrimentally affect any sense of Gravel Lane as an attractive part of the wider public realm and which would undoubtedly affect adjoining businesses negatively. - how much more noise pollution residents, many of whom are still working from home, can bear. We are already negatively affected due to numerous building projects, which will only get much worse with the heating installation and several planned adjacent construction projects. - how the estate could benefit from any future works, rather than having to continue to suffer the continuous erosion of its quality in a death by a thousand paper cuts. The ensemble has already seen plenty of poorly executed changes, to which the remnants of the stairs on Middlesex Street or the badly executed demolition of the vehicle ramp on Artizan Street stand as unhappy memorials, or the removal of the estate office and community facilities including the community room and kitchen from the podium, the overpainting of the original joyful colour schemes, the illconsidered heating pipes etc etc.

06.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: What are the benefits for the residents of MSE?

07.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: Terrible. Since the police is using the garage there is much more noise and a lot of vans parked around the state. Some of them near the Travelodge, leaving no space available for couriers and therefore sometimes they are not able to deliver

08.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: Please stop playing with the residents! Everything the Corporation does with the estate make it worse than before. And only they benefit from these sell outs, residents not. We do not want the police here, There is no place to park around the estate because of their vans, Couriers to the tower cannot park and make deliveries because the police leave their vans around the entrance to the state, close to the Travelodge. And thy make a lot of noise. Please stop!

13.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: to whom it concern if any body we live at X petticoat square we have lived here for 40 years I have been involved with many objections re the corperation of London and never had any successes I wonder why me my wife and son live at the address I myself are disabled I was retired from the corperation in 2006 I am in receipt of a full disabled allowance my son who is 41 years old and as been serverlly disabled since birth and gets a full disability allowance and my wife suffers from arthritis at the moment we have a garage in the basement area which we keep mobility aids disabled scooter and wheelchairs etc so we need to secure these items looking at the basement plan the cars will be parked where the police cars are parked as we will not be able to use lift 3 and 4 to enter and exit the basement we would have to walk all the way round the balconies to go to the basement what is worse we will have to come up from basement carpark in lift number two with a weekly shop etc and walk all around the balconies to 467 which is furthest away from lift number 2 now on more general note people moving in and out will have a problem also deliveries walking down the sides of the compound likewise rubbish removal we don't like the fact of living above the police station regarding noise police dogs which we often hear and police cars sounding there sirans before leaving the underground carpark which we have witnessed which almost give us heart attacks and my son was in a distressed state all day also the terrorist threats have not gone away and what a target we would be so no we don't think the police should takeover the part of the estate they propose to do regards

22.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: The information and map give scant detail and raise many questions which are not answered. EG - Police

vehicle Alarms!!!!! Noise from Police vehicles going in/out New residents car park in basement - safety issues - owner walking to/from their vehicle, especially for women and at night. Loss of garages and sheds. Residents will not gain anything financially - individually or for the Estate How are shop owners on Gravel Lane to be compensated? Gravel Lane will become a scary no-go area Leaseholders - if we have works done to our flats where are the service vehicles to be parked? In the Basement? - But the Police can't get their tall vehicles into the Basement - so will our contractors be able to?

22.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I'm very concerned being a resident of Middlesex St Estate. I'm concerned about the impact it will have on residents not least the loss of facilities to residents Your proposed changes in the information given are sadly lacking and very vague I would like to speak with one of your officers

26.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: As a Black resident I am concerned about the threat which living in such close vicinity with an institutionally racist organisation will pose to my (and my family's) health and well-being. I am sure this is not something that you have even remotely thought about as it may not impact you. However, it is already difficult having to deal with the large numbers of officers who hang around the police vans parked on the surrounding roads! Therefore, will you be guaranteeing estate residents and the local community that we will not become an easy target for police officers. They will be taking over a significant amount of space on the estate which will reduce access for residents in a number of areas. The Tower and the Ground floor car park will become a particular hot spot which will directly impact residents. But you have not provided sufficient information for anyone to make an informed decision in relation to this. There are a number of questions that need to be answered for residents to be able to make an informed decision about this proposal: How many additional cars/vans will be on the estate? What will be the peak periods of use for the car park? Will lost car parking spaces be replaced? How many officers will become resident at different periods? What type of facilities will they be building? For example will they be holding prisoners in the new facility? Will they be storing fire arms? Will there be dogs - particularly as dogs are not allowed on the estate? If they are housing dogs - will you be changing the rules for everyone? Will we still have access to the storage lockers on the first floor? If not will they be replaced? Will residents have to share an entrances with officers? Will they have access to the entire estate? How long will the building of the facility take? What will be the impact on residents whilst building is ongoing?

26.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: To whom it may concern: After reviewing the plans proposal project, I am opposed to the proposal for the City Corporation to develop additional space for the City of London Police. The proposal is vague in its details of the police compound and what it entails for the residents. My concern

comes from previous projects undertaken on the estate that have demonstrated that residents are not fully informed of the implications of the developments and what effects they will have on the estate. For example, in the existing police compound, the survey and proposal informed that it would be used for police storage vehicles and their repair yet, it failed to mention that residents would be restricted to using only the front door at the glass staircase as the backdoor would be for police use only. Therefore, it is highly likely that the creation of this new police compound which is proposed to stretch over three floors will massively limit access to areas of the estate to residents and other persons. Also, in many instances, residents have not received deliveries because police vehicles parked at the entrance of the estate building parking facility have prevented delivery vehicles from entering the building. Also, the police use of canines has caused noise disruption as I have heard barking during the day and night. In the new police compound, there could be several more disruptions that are not being communicated to the residents. Moreover, I am concerned about the new accommodation on the first floor as this area is where residents currently have a shed. There has been little communication about who is involved in the project and the current plan is vague in its description. Therefore, I have worries that these sheds would also be taken over by the police compound or become harder to access, leaving residents without the use of this amenity. Also, moving the residential parking lot to the basement is a poor decision. The basement has weak phone reception, which may be problematic if someone had to make an emergency call. In addition, I assume that space for market stalls will be removed from the Middlesex street side, which would negatively affect many families whose income is obtained from the market.

28.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: Thank you for the opportunity to comment on the proposal. My experience of the police using the basement for parking so far has been very positive. It is reassuring to know that there is a police presence and to see officers come and go at various times. I feel that an expanded police presence as proposed will be beneficial to me as a resident and to the general public who rely on a police presence in the area, able to respond to policing matters in a timely manner by being local. As a taxpayer I am relieved to see the current unused publically owned spaces finally being filled in what I consider a useful way. The shop units are shuttered every night and when the shutters are down all you can see is a row of ugly graffiti covered shop fronts in Gravel Lane. This creates the impression of a neglected and unsafe neighbourhood. Hopefully the police using the units on Gravel Lane will remove the graffiti and present a more pleasant and attractive frontage along that street. The residents on this estate have complained about the brothels in the neighbouring streets to our estate. Hopefully a police presence will deter antisocial behaviour. I would hope that with the investment being made by the police that the council will ensure there are other benefits for the residents. I would like to see an EV charging point for public use and more provision for disabled parking, better lighting and better cctv. Hopefully the new development application will show details of how the plans will help the city meet it's stated goals in reducing emissions and improving the environment.

28.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I feel like the residents will be pushed out and have less spaces

28.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I not agree with it. I found as well very un respected to the people living here doing consultation with out complete explanation o clear proposal.

28.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I think it is a good idea.

28.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: It's verry bad for the Reisients whouse it and the shop owners too as it's their lively hood disrupting that can cost people's life through after Avery bad period of lock downs people's economy suffered and this disruption is like a nail on the coffin ibeleave their is a lot of new built in the city / being new the city could Incoperate places amongst the new built and at least give peace of mind to the shop owners as well as residents, who are going to be affected by this, it's been too tough years lately ibeleave the outhority is there to easy that pain rather adding more traumas to the city residents and shop owner surely there some more options beside taking over most of the space in the estate

28.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: It is hard to comment with the very limited information provided. Once we have more information I can tell you what I think of the actual proposal. So far I am not convinced about any benefits for residents

29.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I don't think the police should have all that space on our estate, the police area on the estate causes problems as it is with the fans and alarms. I also have a garage which we need and I think this would mean we would lose it, my mum has walking differculties and we store her frames etc in the garage

29.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I think the estate should remain as housing rather than rented office or car parking spaces, and alternative uses considered for the first floor car park space found as a residential amenity -

e.g. something like a gym or leisure facilities, which residents could pay a small and regular fee to access.

Residents are put off driving here by congestion charge, parking charge and lack of any electrical charging points. So is it any wonder that the car park areas seem vacant? I would prefer to see ground floor space made secure and used for residents' transport and access needs.

If the police have to stay, they should remain in the basement areas which they already occupy. I do not see any benefit from them taking over further parts of the building and your information does not tell me a) why this is necessary and b) why I should want it to happen.

This is primarily a housing estate, so invest and prioritise in your housing and associated amenities first.

There are lots of commercially or socially valuable options that would be quicker and easier to install, still could increase revenue and put the available spaces to good use.

The City should not impose another disruptive and unwanted major project on this Estate - we are already suffering enough!

29.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: Thid is nothing more than the beginning of a project to turn the estate into a non residential site so that the COL can eventually demolish it and build another empty commercial tower. An initial request for possible uses for this area elicited a number of alternative solutions that would have benefited the residents and in some cases even brought in an income stream for the greedy COL but none were ever acknowledged. The residents gain absolutely nothing from this proposal. It is claimed that the rents will go to the hard-pressed fund that maintains the building but if this fund is so hard-pressed that it can embark on a project to install expensive and unnecessary sprinklers when all that is needed for fire safety in the tower is a proper alarm system and a safe escape route, which would cost much less. If the maintenance fund is short of money there is nothing to prevent the extremely wealthy COL making a special grant of money to the housing maintenance fund.

29.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: To whom this may concern I disagree with the change of use of the car parks etc. We have lived here for over 40 years. myself my son and are registered disabled from birth, and myself was retired from the Corperation of London in 2006 due to ill health, my wife is under doctors/hospitals for many different things. I am 71 years old my wife is 66 years and 41 years old. Is mine and carers when she is able. My first concern is that if we are moved close to the new tenents location for parking we will lose the ability to enter or leave the basement level carpark by lift number 3 or 4. As per drawing, number 3 and 4 lift

will be at basement level in the police compound there is no way that we could use lift number 2 to enter the carpark or bring shopping up from carpark etc as we would have to walk round almost all the way round the fourth floor balconies as we live the furthest away from lift number 2. Another concern we have a garage which we keep our two wheelchairs walking frames mobility scooter and a three wheel trike etc which we can load into the car as and when needed we have no room in the flat for the said items and even if we had it would be difficult to get to the car without the use of lift number 4 . I also have concerns as we are always being told that we are still on a high level for terrorists and what a target this estate would be!. Also the picking up of refuge collection on the ground floor as bin house 3 and 4 are quite away from where the bin lorry can park. Also people that move in and out of the estate will have troubles getting furniture etc to lift 3 and 4. Regarding our son does have behaviour problems also and we can see this will have problems for us he also has Autisum and Epilepsy he can have a fit at any time, he also has cerebral palsey and learning difficulties. The last thing we will add is that lift number 2 is only a small lift which would hinder people taking shopping up etc because of its size where as number 4 lift which is called a coffin lift would have no problems its the largest lift on the estate which if plans go ahead we would lose its use to the basement carpark.

29.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I do not agree with the proposal. It should stay as a Housing Estate not be used for Police as this will cause problems and could possibly make the Estate a target for Terrorist attacks.

No concideration has been given to the elderly and disabled people who live on the estate. Or the residents that park on the estate and have to access their homes.

29.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: There has been an ongoing issue with graffiti and antisocial behaviour in the area. The shop units in Gravel Lane would not be suitable for general needs housing. Currently the shops in Gravel Lane are mostly shuttered at night, giving the street a bad look. If the police occupy most of the shop units in Gravel Lane and use the car parking then the street will be safer to use and more attractive for visitors and vulnerable people using the area. We need more police and hopefully it will improve the safety and security for everyone in the area, businesses and residents plus visitors.

29.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I do not think this is a good idea. I did not understand your diagrams on the letters.

From an article in the Guardian: "In 2014 the Royal Society of Arts recommended that retail car parks could be used for pursuits like basketball, skateboarding and tennis. They could host temporary skating rinks, climbing walls and fun fair rides or even shipping containers in which workshops and courses could be held. Profits from these activities might be be re-

invested into local projects."

Why not consider uses like that which could benefit the residents and remain as housing?

https://www.theguardian.com/cities/2019/nov/07/from-bars-to-pod-homes-how-underused-car-parks-are-being-transformed

29.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: To whom it may concern:

After reviewing the plans proposal project, I am opposed to the proposal for the City Corporation to develop additional space for the City of London Police.

The proposal is vague in its details of the police compound and what it entails for the residents. My concern comes from previous projects undertaken on the estate that have demonstrated that residents are not fully informed of the implications of the developments and what effects they will have on the estate. For example, in the existing police compound, the survey and proposal informed that it would be used for police storage vehicles and their repair yet, it failed to mention that residents would be restricted to using only the front door at the glass staircase as the backdoor would be for police use only. Therefore, it is highly likely that the creation of this new police compound which is proposed to stretch over three floors will massively limit access to areas of the estate to residents and other persons.

Also, in many instances, residents have not received deliveries because police vehicles parked at the entrance of the estate building parking facility have prevented delivery vehicles from entering the building. Also, the police use of canines has caused noise disruption as I have heard barking during the day and night. In the new police compound, there could be several more disruptions that are not being communicated to the residents.

Moreover, I am concerned about the new accommodation on the first floor as this area is where residents currently have a shed. There has been little communication about who is involved in the project and the current plan is vague in its description. Therefore, I have worries that these sheds would also be taken over by the police compound or become harder to access, leaving residents without the use of this amenity.

Also, moving the residential parking lot to the basement is a poor decision. The basement has weak phone reception, which may be problematic if someone had to make an emergency call.

In addition, I assume that space for market stalls will be removed from the Middlesex street side, which would negatively affect many families whose income is obtained from the market.

29.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: The City of London (CoL) has to consider Middlesex Street Estate is a resident estate and people need to rest after office hours. Did CoL satisfy themselves and exercise due care to the residents? What is the mitigation action of City of London Police adopt for noise, sirens, and impact on the residents? This is a residential property, is it appropriate to convert to a police station?

31.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: Section 105 Consultation re Middlesex Street Estate's car parks and six shop units

My response to the consultation is restricted to observations on the 'provision of services and amenities in connection with dwelling-houses' as specified in the Housing Act.

Unfortunately the information provided to residents in the notice of consultation and the follow up meeting is insufficient to make informed comments on the proposals and only raises many unanswered questions, including the following.

RESIDENTS CAR, MOTOR BIKE AND PEDAL BIKE PARKING SPACES AND GARAGES

- Q1. What is the current number of spaces and garages eligible to be used by residents?
- Q2. What will be the number of spaces and garages eligible to be used by residents once these proposals are implemented?
- Q3. Will all spaces and garages currently rented by residents continue to be available to them once these proposals are implemented?
- Q4. If the answer to Q3 is no, will the same number of spaces and garages be available to each resident currently renting these facilities?

ACCESS TO AND FROM FLATS AND RESIDENTS CAR PARKING SPACES AND GARAGES

Q5. Will all current access routes between flats and car parking spaces and garages continue to be available for the use of residents?

Q6. Will there be any increased footfall in these access routes as a result of the proposed changes

ACCESS TO AND FROM FLATS AND THE STREETS THAT SURROUND THE ESTATE

Q7. Will all current access routes between flats and the streets that surround the estate continue to be available for the use of residents?

Q8. Will there be any increased footfall in these access routes as a result of the proposed changes

RESIDENTS' STORAGE SHEDS

Q9. Will there be any changes to the number and location of storage sheds eligible to be used by residents?

WASTE AND RECYCLING FACILITIES

Q10. Will there be any changes to the waste and recycling facilities available for the use of residents?

RESIDENTS' PODIUM GARDEN

Q11. Will there be any physical changes to the residents' podium garden, childrens play area and ball cage as a result of these proposals?

Q12. Will there be any change to the people eligible to use the podium garden, ie. currently this space is for the enjoyment of residents and not for the commercial tenants or the general public.

CONVERSION OF THESE SPACES TO SOCIAL HOUSING UNITS

Q13. How have you assessed the potential to use some of this space for additional social housing units?

31.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: I think the proposal has been vague in its description and I do not support the use of the units as a police compound. The proposal of using it as a police compound will cause disruption to residents and is a waste of space that could be used for the residents of the estate. Building a police compound would restrict resident access to certain areas of the estate and this would inconvenience the residents and block passage to walkways.

31.07.22 Are you: A Resident

What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?: The question is disingenuous.

It makes no mention of the COL

desire to give it to the police to turn into a police station.

This is a residential estate and it should not be allowed.

The shop units should be a benefit to the residents not a burden.

A youth club for the teenagers, a food bank or housing would be far more suitable .

Feedback received via email:

Sent: 02 July 2022 15:43

To:

Subject: Shops converted to police accomodation

ні

I just received the letter about the proposed plans. I saw that 6 shops are listed as being converted into "accommodation". What does accommodation mean in this case?

Best,

To:

Subject: PROPOSED CHANGES TO CAR PARKS AND SHOP UNITS AT THE MIDDLESEX STREET ESTATE

Hi

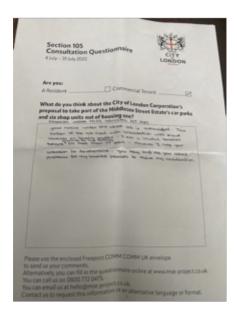
No I do not Agree with the proposed changes to the Estate and shops -car parks.

1. Why are we doing everything for the Police when, we should be doing more for the Estate it self I have still got the old style windows but you are not spending money on THEM.

What's happening to the shopkeepers Business. All the corporation think about is filling there pockets there to many on the ESTATE now .

I DO NOT AGREE.

12.07.22 received via email:



Date: Thursday, 14 July 2022 at 09:56

Subject: RE: Statement to Commercial Tenants at Middlesex Street Estate - Phil parker ltd 14 Gravel Lane

Dear

thank you for taking the time to write to me and it was good to meet you on Tuesday. The initial consultation meeting did seem more of a box ticking exercise, but I do understand you have processes that need to be adhered too. The plans to develop and change the use of our retail unit are causing my staff and I are fair amount of stress. It has been a very difficult few years weathering the Covid crisis and not all retailers have navigated the obstacles successfully. Only in the past few months has business begun to return to normal conditions and we were hoping for a few years of uninterrupted trading.

Whilst I understand no decision has been made, we do need to plan for the worst outcome. The break clause in our 10-year lease comes on March 31, 2023. We are entitled to a notice period of 6 months. I am pragmatic and realise there is no point fighting decisions out of my control, all we can do is plan properly to ensure the survival of Phil Parker ltd. Suitable commercial property is very limited and we do require a central London location for our customer base. We were and are still hoping to be located on the Middlesex Street Estate for many years to come, it suits our business well. 6 months is not enough time to find, re locate and re fit a new shop for Phil Parker ltd.

Is it possible that we could begin discussions about other retail units in the area that could work for our business? Having a back up plan should the planning go through, would certainly help to ease our worries. I notice that a shop on the estate has recently closed. 11 Harrow Place E1 7DB. If it is the same footprint as 14 Gravel Lane, this could clearly be an option for us and I would like to put an early marker down expressing our interest in this property or anything similar before it goes to the open market. Can you let me know if this is possible or who I should speak to regarding vacant retail premises on the Middlesex Street Estate?

Thanks again for communicating directly with me, it is comforting to have contacts that we can ask questions of at the appropriate moments through this planning process. I look forward to hearing from you in due course.

Kind regards,

22.07.22 Email to hello@mse-project.co.uk

police taking over part of Gravel Lane & the car parks - Commericial tenant opinion

Hi

Im a commercial tenant on Gravel lane number 20.

I strongly disagree with the proposal of the police taking over gravel lane car parks and closing several shops.

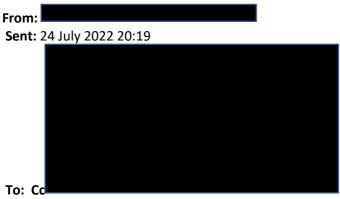
I think its extremely unfair and showing a total lack of respect to the tenants especially after covid.

22.07.22 Email to hello@mse-project.co.uk Middlesex Street Estate Website Enquiry

Hi

I'm a resident of Middlesex St Estate and I would like to speak to one of your team regarding the Police project

Please call me in the first instance



Subject: Section 105 Consultation at Middlesex Street Estate and impacted commercial tenants on Gravel Lane



I am writing to you regarding the current S105 consultation on Middlesex Street Estate and the potential impact this is going to have on some of our commercial tenants on the Middlesex Street Estate and in particular the Gravel Lane side of the Estate. See plans and S105 letter attached.

One of the main reasons I am reaching out is because some of the businesses which will have to move for the police project, want to stay on the estate and there are currently two empty units available and empty units do not become available very often.

One vacancy is already being advertised and the other is about to come on the market. These vacancies are at:

- 81 Middlesex Street https://search.kinneygreen.com/properties/90079-81-middlesex-street-london
- 11 Harrow Place (Kinney Green have been instructed by the City to market this property and will be advertising it shortly as it has only just become vacant)

on 8 July requesting that we halt advertising these vacancies externally and for a plan to be put in place whereby the businesses at risk of losing their shops on Gravel Lane if the police proposal goes ahead could be prioritised for these current vacancies.

I am including my previous correspondence with selow and I am also attaching Director reply to my request.

Last Wednesday at Community & Children's Services Committee, I again asked what process the Director has put in place to relocate those businesses, who wish to move to other available units on the Estate, so they can continue trading with minimum disruption? You can hear Andrew's response here

https://www.youtube.com/watch?v=R 0sWnTvAGA&t=3061s

I am very unhappy with this approach . It seems rather callous to me to not be considering the futures of our current commercial tenants in our thinking in relation to our commercial shop vacancies as and when they become available, and I am surprised and concerned at the lack of joined up thinking around this police proposal and its long-term impact on residents and businesses. There needs to be a more coordinated approach with this project and clear shared objectives. Future thinking - making the most of opportunities when they arise. Proceeding the way that is being suggesting is not helpful to my constituents, least of all the businesses.

I want those impacted businesses to have the first opportunity on any unit that becomes available, which seems the most sensible way of relocating existing businesses which want to stay, and also providing the empty space ready for the City police project.

I am copying in my ward colleagues and the Chair of Housing.

I look forward to hearing from you on the above.

Regards



28.07.22 Email to hello@mse-project.co.uk

Section 105 Consultation Questionnaire - response from Residents: From:

Further to the letter sent to individual households and the follow up event at the Artizan Street library, the question has been asked of residents on the Section 105 Consultation questionnaire " What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car park and shops out of housing use?

Unfortunately, apart from the proposed plans there is no further information that we have been provided with, and hence insufficient information that would allow any considered comment to be made. The event in Artizan Street, quite frankly, was a waste of time, as all that was shown were the

same plans as on the mail drop, and officers or representatives who were present openly admitted they had no further information to offer.

As a basement car park user that had my garage taken from me when the Police originally moved into the basement, I am particularly concerned to see that the basement proposal is to move the Police to the Gravel Lane end. This is particularly galling, as this is the location, we were originally informed the Police would occupy before we were told last minute, with a weeks' notice to vacant, that they would now occupy the Harrow Lane end.

Since the Police moved into the basement car park, we have had to endure the basement car park gate / shutters being out of action (4 - 5 months in 2021, 4 months so far this year). This has resulted in a far less secure parking area than before, whereas we were told that having the Police in situ would be safer for us. They of course are secure in their secure compound.

In addition, since the Police have been in the basement, there is a constant, drop off and collection of Police vehicles by transporters. This in itself, should not be an issue but Artizan Street where the transporter's drop off and collect is effectively a tunnel with buildings on both sides. This, plus the road's construction means that Petticoat Tower vibrates whilst the engines are running.

This is not to mention the debacle of the basement alarms and fans that meant that the fire brigade was constantly attending, and residents had to endure hours of disturbance night and day.

I mention all of the above, as the simple task of installing the Police in the basement caused huge upset and disruption and ongoing issue. This project is much larger and will cause far more disruption and ultimately more traffic on the estate.

In order to understand what is being considered please provide answers to the following:

Basement Car Park

- 1. will the existing secure compound be left for residents' vehicles?
- 2. will this be with the current gate that will lock with the current mechanism in place?
- 3. if the compound is being removed, why?
- 4. if the compound is being removed will there be a guarantee that the gate / shutter works at the ramp entrance?
- 5. will garages be re-instated as before?
- 6. will all those that had a garage get a garage again?
- 7. what will the new compound be used for by Police?
- 8. where will residents gain access to basement car park, as it looks like we will lose access on Middlesex Street and Gravel Lane Stairs and Lifts

Ground Floor

- 1. exactly what is to be parked/stored in the Accommodation / Car Parking
- 2. will there be increased vehicles entering the garage?
- 3. currently this area is used for workmen / contractors and residents. Where will they now be accommodated?
- 4. some residents are scared to use the basement as it is unsafe due to lack of security, so will they be offered ground floor car parking?
- 5. Where will all the recycling/waste bins be placed? Please note they need to be within the car park as they were placed outside the entrance before and this resulted in mess and use by rough sleepers as a toilet amongst other things.
- 6. What will happen to the bike storage?

7. Could this space not be better used for a Football / Ball cage for residents to remove the noise created by this from the Podium?

First Floor

- 1. The plan says Accommodation but what does this mean and how precisely will it be used?
- 2. will the shed be kept by the residents?

General

- 1. Buildings insurance is included in our service charge. Will this new proposal and building affect our building insurance element?
- 2. with regards to service charges how will this reduce our service charges? The new compound and new accommodation will be housed under the Podium, so I expect they will be required to pick up any costs associated with the Podium, as it will be their roof. Please comment?

I am sure there is a multitude of other questions but as well as the above, the main question is what benefits will the residents derive from these proposals, as I assume there will be a loss of amenities which is why the section 105 has been issued? Please provide some benefits to the Estate who may have to endure nearly two years of additional construction?

If the City of London can be very clear on the proposals, on what amenities will be lost, and what benefits residents can gain then it will be more of a consultation that we can comment on.

I look forward to receiving your replies in due course

Kind regards



Open Letter

8th July 2022

I am writing to you on behalf of myself and all of the Members of Portsoken. We wish to complain in the strongest possible terms about the recent consultation that was sent out to residents on the Middlesex Street estate about the possible occupation of the car parks by the COLP.

This complaint is about the paucity of information provided. It is almost an insult to residents to expect them to be able to usefully comment based on just three very basic floor plans. The WhatsApp group they have set up specifically to monitor this, reflects their anger and frustration.

Here is a list of questions that we believe need to be answered immediately, with the answers being sent to residents as well as us. We also believe the start of the consultation period must be postponed until residents have received this information.

- Will every resident who has a parking space now, still have a parking space on completion?
- Will every resident that has a garage still have a garage on completion?
- What disabled parking will be available?
- Will there be any electric vehicle charging points?

- Where will the main entrance be?
- What is the expected footfall?
- Will they have their own lifts to move between levels or will they use the residents' lifts (thus depriving them of their use for a time)?
 - What will be done to help the shopkeepers facing eviction?
- What will happen to the shop windows? What will the Gravel Lane street view look like?
- How long will construction go on for and what is being done to limit disturbance to residents?
 - What exactly is the "accommodation" being used for?

We, and the residents on Middlesex Street, look forward to seeing the answers as soon as possible, along with confirmation of an extension to the consultation period.

This is an open letter, and we will share it with the residents and shop keepers on Middlesex St. Since we were not informed in advance about the timing and content of the original consultation letter, by your department, we were made to look incompetent and out of touch. We hope that by publishing this letter we may be able to restore at least some of our credibility.

Yours faithfully,

On behalf of

From:

Date: Sun, Jul 31, 2022 at 10:24 PM

Subject: Proposed police use of Middlesex Street Estate & Car Park

To: <hello@mse-project.co.uk>

Dear MSE Project

I am writing on behalf of my business, Kall Kwik City of 16 Gravel Lane, with regards to the section 105 plans recently circulated to residential and commercial tenants of the estate.

The proposal received was very short and lacking any real information, how are tenants expected to pass honest comment without understanding the full picture? Despite the briefness of the proposal, I would like to express my strong opposition to these plans.

Relocation would result in a huge loss of goodwill and be a very expensive endeavour – please find attached an estimation of our moving costs for your reference.

Note: these costs assume we relocate to another City location and do not include legal fees, renovation costs (which are likely to be in the high thousands) or any increase in rent and rates on new premises as these are unknowns until a new unit is found.

As per my franchise agreement we need to be situated within the square mile, if we were to move outside of the City we would be required to rebrand and trade under a different franchise agreement – adding further costs to a relocation. The Kall Kwik <u>City</u> name would be no more – something I've worked extremely hard to build from the ground up.

This situation has caused a huge amount of uncertainty for my business, we cannot future plan our activities with the thought of relocation looming over us.

This uncertainly also means were unable to start paying back our Covid rent arrears.

If possible, can you please provide detailed answers to my following questions:

- 1. What is the timeframe proposed for these plans?
- 2. Will the City look to relocate the commercial tenants to other properties held in their portfolio?
- 3. What support will be given by the City for commercial tenants who are being forced to move?
- 4. What are the plans for the shop units on Gravel lane?
- 5. Why is more space required for the police when there's station around the corner on Bishopsgate?
- 6. Will the City be open to negotiation around Covid rent arrears in light of these plans?
- 7. When will be informed on the next steps of the process?
- 8. Who is our main point of contact with questions or queries?

I look forward to your response.

Many thanks

APPENDIX E

Copy of resident's email

Date: 6 July 2022 at 9:00:30 PM GMT+1



_ Subject: Proposed police use of Middlesex Street Estate Car Park - Request for Further Information and Responses

Dear MSE Project, Relevant officers of the DCCS of the City of London Corporation, The Commissioner of the City of London Police (or office thereof)

I am writing on behalf of residents and leaseholders on the Middlesex Street Estate with regard to the Section 105 consultation recently circulated to households about the car parks.

Thank you for your recent letter to all residents regarding the proposed changes. However, we do not regard the brief summary of the proposal in your letter and accompanying diagrams to constitute sufficient information on which to pass comment on your proposal.

This is a formal request for the City, City Police and its appointed project officers to provide a detailed written statement further detailing the exact nature and specifications of the proposed changes to the MSE car park and estate. We would appreciate further information by the deadline of, or in addition to, the proposed consultation meeting on 12th July, either in the form of a presentation or a Q&A document that can be circulated to all those concerned well before the deadline of your consultation on 31st July.

While we realise the final designs may be subject to a further planning consultation and process, MSE residents, tenants and leaseholders would expect and appreciate a fuller account of the changes so we can make an informed comment on your current consultation under the terms of section 105 of the Housing Act.

If possible, please provide answers or further guidance on the following questions, which have been raised by residents and leaseholders on the Estate. For your convenience I have also pasted the same questions into a word document.

I am cc'ing to this request the Alderman and common council members for the ward of Portsoken, and Roger Way, Chairman of the Middlesex Street Residents Association, who I trust will support and endorse this sincere request from residents and leaseholders for further information on this proposed project.

I am also cc'ing the Chair, City of London Policy and Resources Committee, who I understand recently visited the Estate with our Portsoken councillors, and the Chair, City of London Capital Buildings Board, who will be aware of the background to this project to date.

We look forward to receiving fuller details of the project and further information from you.

Regards

Resident and leaseholder of Petticoat Tower, E1 7EF Chair of the Petticoat Square Leaseholders Association Also on behalf of fellow residents and members of the Middlesex Street Residents Association. Telephone:

Questions from MSE Residents and Leaseholders for your consideration:

- 1) How many car parking spaces will be left available for residents and visitors as a result of these changes, and how many for City Police vehicles? We assume at this stage there will be fewer available for residents, so please state the current and proposed future numbers, or at the very least the proposed future changes in proportional share of the car park allocated to a) residents / visitors, commercial tenants and relevant public parties (workmen, services or deliveries) and b) City of London police.
- 2) What is the nature of the "accommodation" described for City Police as well as car parking or "compound" in the consultation documents? How much or what proportion of the proposed new facilities will constitute this "accommodation" as opposed to car park spaces (or dedicated compound) for City Police vehicles?
- 3) How will police officers enter or leave the proposed new compound or accommodation, either in vehicles or on foot? Are there any proposed changes to how residents / visitors access the Estate via existing or proposed new entrances, also either by vehicle or on foot?
- 4) What is the proposed term of lease or arrangement by which the City Police will use the potential new compound and accommodation? How long would they be expected to use or occupy these areas? Please state the minimum term or time period when City Police would have use of the Estate suggested terms for renewal or extended use of such a term?
 5) What will the proposed new "compound" for police potentially look like from both internally and externally to passers-by on the estate? Will it look similar to that installed in the basement car park i.e. blank walls with no decoration or features except security installations?
- 6) Why is the current compound for police vehicles in the basement car park not considered fit for purpose, such that you propose it being moved entirely? Is there an issue with current

police access to the building? If so, please specify as it could have implications for residents, visitors and public parties (such as deliveries and services)

- 7) What will the changes to the shops on Gravel Lane involve and why are they necessary? Will the new compound or police accommodation be visible or accessible from the street / public highway on that side?
- 8) Would the same or similar automatic number plate recognition systems (ANPR) and gates (which have regularly and consistently failed over the past three years) be in operation for car park facilities for both residents / visitors and police? If not, what changes do you envisage to ensure security for both residents and commercial tenants on the Estate?
- 9) Will the proposed changes alter or remove the existing storage sheds and bicycle racks currently used by residents / visitors in the ground floor car park, or the storage sheds on the first floor?
- 10) What will happen to the garages currently rented by residents in the basement car park if the proposed changes are implemented?
- 11) Will residents who currently rent a car parking space (or shed/garage if applicable) as well as visitors and public parties who require temporary parking be guaranteed alternative and equivalent space in a new area (i.e. the basement?) on the same terms as that currently offered?
- 12) Will existing facilities for residential and shop services: i.e. recycling bins, large item disposal, cleaners' cage, be affected by the proposed changes or remain in the same place in the ground floor car park?
- 13) Are there any plans to install electric car charging points or accommodate and consider future transport and access needs of residents, rather than the sole needs of the City Police or other potential commercial tenants? If so, how many charging points or other facilities e.g. bicycle racks, car share or bike share parking spaces, will be provided and accessible for residents and visitors?
- 14) What provision is there in the plans for disabled parking as a ratio to the number of residents on MSE? What parking provision will there be for service vehicles parking, deliveries and visitors?
- 15) Apart from the police and City Surveyors, have any independent consultants or surveyors so far been appointed to advise on or recommend these changes? If so, please state who, and provide contact details or relevant documentation, if possible.
- 16) In particular, has the City yet considered environmental and noise impacts on residents of increased police use of the car park which we assume would involve more vehicles and footfall through the estate, often at antisocial hours? How do these proposed changes comply with commitments to reduce pollution and clean air strategies?

- 17) Can you provide evidence how elected councillors have properly scrutinised and been made aware of these proposed changes, including our local council members for Portsoken ward? Please consider making public the City Surveyors report(s) from Gateways 1-6 prepared in relation to this project and any relevant documents, information or conclusions already presented to relevant committees, e.g. the Capital Buildings Board, even if only in redacted or summary form.
- 18) What will the change in use or designation from "Housing" to police (or other commercial use) mean in practice to the Estate finances in terms of revenue? Will any rents from police use of the car park accrue back to the MSE directly or be directed to the Housing Revenue Account (HRA)?
- 19) What has happened to the proposals to convert the first floor car park into commercial office space for tenants other than the police? Why has usage by police been preferred to this option?
- 20) What consideration has the City given to conversion of any of this space to provide social housing accommodation?
- 21) What consideration has the City given to conversion of any of this space to provide health and leisure facilities to residents, especially children and teenagers?
- 22) How do these proposed changes relate to the previous decision to sell off the Snow Hill police station on Wood Street and convert it to a hotel? How do the proposed changes relate to or fit in with the stated police strategy to move to a new headquarters in Fleet Street later this decade?
- 23) Are there any plans to close or sell off the police station / accommodation on Bishopsgate (or other locatoins), which has prompted the proposed expansion of police presence on the MSE?
- 24) In a brief statement, please explain what benefits residents can expect to see from these proposed changes to what is primarily a residential estate, rather than a commercial or police premises.

Thank you in advance for your time and consideration on this matter.

APPENDIX F

Resident Response document and accompanying letter sent to all residents and commercial tenants on 12.08.22; briefing email sent to Portsoken Ward Councillors and Members on 11.08.22:

Covering letter:

partment of Community and Children's Services frew Corter retor of Community and Children's Services



The purpose of the recent Section 105 consultation was for the City of London Corporation's Department of Community and Children's Services to consider whether parts of the basement car park, ground floor service yard and Gravel Lane shop unit areas proposed for alternative use at the Middlesex Street Estate are still required for housing purposes.

The Section 105 consultation ran from 4 to 31 July. There was a public event on 12 July, which was attended by 23 residents and commercial tenants.

The consultation generated 51 separate pieces of feedback, a mix of questionnaires submitted online, on paper at the public event, by post, on via email and direct phone calls.

The enclosed document seeks to answer, wherever possible, some of the questions that have been asked as part of the consultation. The sole purpose of the Section 105 consultation is to determine whether the proposed space is surplus to housing use. Unfortunately, this means that we cannot provide detailed information on potential alternative proposals for the use of the surplus space and we understand this will cause some frustration.

If proposals for alternative use of the surplus space were to proceed, further responses to the questions asked and information requested would be expected to be made available as part of a planning application and associated planning consultation process. Please be assured that no decision has yet been made on any alternative proposal.

Should you have any further questions on this matter, please do not hesitate to get in touch with the team either:

By telephone on 0800 772 0475

By remail at info@mse-project.co.uk

By writing to us at Freepost COMM COMM UK

Resident Response document:





Ris











Section 105 Consultation **Response to Residents**

This document seeks to address some of the questions asked by residents and commercial tenants during the Section 105 consultation, which ran from 4 to 31 July 2022.

The purpose of the Section 105 consultation was for the City of London Corporation (the Corporation's) Department of Community and Children's Services to consider whether the areas of car park, ground floor service yard, first floor car park and six Gravel Lane shop units proposed for non-housing use at the Middlesex Street Estate are still required for housing purposes.

It should be noted that many of the questions asked and information requested relate to a proposal for non-housing use at Middlesex Street Estate and do not fall under the scope of the Section 105 consultation. If proposals for alternative use were to proceed, the questions asked, information requested and some responses would be expected to form part of a planning application and the associated consultation process.

All questions and comments generated as part of the Section 105 consultation process will be passed on to relevant colleagues involved in progressing the proposals for alternative use and who will support any future planning consultation by providing as much information as is reasonably possible.



Many questions were asked surrounding the loss of parking spaces, garage and storage spaces:

Many of these questions relate to the proposal for alternative use and are outside the scope of the Section 105 consultation process. More detailed information and responses to these questions would be expected to form part of a planning application and associated planning consultation.

It should be noted however, that whatever the future use of potential surplus space in the car parks and ground floor service yard, it will not lead to a reduction in the number of parking, garage and storage spaces required for tenants or visitors. The intention is that residents will not lose any currently designated storage or car parking spaces.

The first-floor car park is currently not accessible for resident's car parking.



Questions were asked surrounding provision of cycle spaces, cycle storage and EV charging points:

These questions relate to a proposal for alternative use and are not part of the Section 105 consultation process. More detailed information would be expected to form part of a planning application and associated planning consultation process, should the proposal for alternative use ceed further

Whatever the future use of potential surplus space in the car park, it will not lead to a reduction in available cycle and storage spaces and The Corporations will continue to meet the needs of residents on the Middlesex Street Estate.

For any proposed future use, the design team would work with Housing, Highways and plant colleagues to ensure that cycle parking and storage provision addresses with the London Plan Cycle standards.

With regard to the provision of electric vehicle charging points, the Department of Community and Children's Services are currently working on a bid for funding to enable the installation of charging points across all of our housing estates, including at the Middlesex Street Estate.



Questions were asked about the provision of disabled parking and car park access:

These questions relate specifically to a proposal for alternative use and do not form part of the Section 105 consultation process. However, if areas currently used for parking – including accessible parking – are subsequently declared surplus, sufficient accessible parking to meet current and future projected needs would be relocated to accessible basement areas, where there is adequate capacity and accessibility to accommodate all anticipated requirements.

For any future proposal for the use of potential surplus space, the Corporation would need to develop an appropriate parking strategy, with support from the Housing Estates Team, to ensure the practical needs of vulnerable residents, as well as businesses, visitors and service vehicles are met. In addition, the Corporation must ensure it continues to meet its legal obligations in relation to the provision of disabled parking bays and access to car parks.



Questions were asked concerning the ANPR system and security gates:

These questions relate to a proposal for alternative use and are not part of the Section 105

However, legitimate concerns have been raised about the reliability of the ANPR system and the gates/shutters to the car park entrances. Whilst it is correct that the ANPR and gates/shutters to the car park entrances have failed regularly over the last three years, this has been due in part to vandalism and vehicle accidents. We are looking at ways in which we can 'future-proof' the entrances to avoid lengthy repair and maintenance times.



Many questions were asked concerning police presence, police use and police access at the Middlesex Street Estate:

These questions relate directly and specifically to a proposal for alternative use, which does not fall within the scope of the Section 105 consultation. If the proposal were to proceed, the information contained in some of these questions would be expected to form part of a planning application and associated consultation process. It should be noted however, that due to security restrictions, there will likely be limitations on the level of detail that can be provided.

All questions and comments generated as part of the Section 105 consultation process will be passed on to relevant colleagues involved in progressing the plan for alternative use, who will consider how best to respond if the proposal does move forwards.



Many questions were asked about changing access routes or restricting access to lifts, stairs and car parks:

These questions relate directly and specifically to a proposal for alternative use, which does not fall within the scope of the Section 105 consultation process. If the proposal for alternative use does proceed, the information contained in some of these questions would be expected to form part of a planning application and the associated consultation process.

If potentially surplus areas in the car parks and ground-floor service yard proposed for non-housing use at the Middlesex Street Estate are indeed declared surplus for current housing purposes, the remaining space will be considered suitable and sufficient to maintain access routes for residents to lifts, staircases and car parks without adverse impact on equalities.



Many questions were asked by the Estate's commercial tenants on Gravel Lane about their businesses and premises:

The Department of Community and Children's Services is consulting with its residents and commercial tenants as to whether the surplus space in the car parks and ground-floor service yard is required for housing purposes, in line with the Corporation's statutory obligation under Section 105 of the Housing Act (1985). If it is subsequently determined that the space is surplus to housing requirements, officers and Members may consider the proposals for alternative use and, where appropriate, begin discussions with those commercial tenants affected by the proposals.



These questions relate directly and specifically to a proposal for alternative use, which is not part of the Section 105 consultation process. If the proposal for alternative use does proceed, the ion contained in some of these questions would be expected to form part of a planning application and the associated consultation process.

Irrespective of any decision taken in relation to the proposal for alternative use, the issues of wate leakage and falling masonry will be addressed as part of the Corporation's Housing Major Works and Repairs and Maintenance Programmes.



Many questions were asked relating to existing facilities, waste management, access for service vehicles and deliveries:

The following questions relate directly and specifically to a proposal for alternative use, which is not part of this consultation process. If the proposal for alternative use were to proceed, matters such as refuse collection, waste management, recycling and parking would be included as part of steh Management Plan contained in a planning application and associated planning consultation. It should be noted however, that taking into consideration those areas that have been identified as potential surplus for current housing purposes, the remaining space is considered suitable and sufficient to maintain appropriate access for servicing, maintenance and access by service and delivery vehicles without adverse impact on equalities



Questions were asked relating to the podium space:

These questions relate directly and specifically to a proposal for alternative use and do not form part of this consultation process. The podium space is not included in those areas that are being considered as potential surplus. Any future proposal for the use of surplus space will not be considered if it leads to restricted access to the podium.



Many questions were asked relating to alternative uses for the car park space, whether that be for social housing, community or other commercial use:

The proposal to convert the first-floor car park into commercial office space was a 'time limited' offer that has subsequently fallen away. Progressing that offer would have required the permanent disposal of the space in the first-floor car park which, at the time, was not something the Corporation wished to pursue.

The proposal to convert the space into social housing was also explored, but as the first-floor car park does not benefit from sufficient natural light, any accommodation built into the space would have to be built upwards, thereby preventing future access to the podium garden for residents. For

Proposals to develop surplus space in the Middlesex Street Estate for housing-related community use has been considered in the past. Some short-term projects were implemented but these were limited and ultimately did not last. There have been no other tangible sustainable proposals put forward to suggest that this is a viable proposition.

Briefing email to Ward Councillors and Members sent 11.08.22

Dear Councillor,

Outcome of the Section 105 Consultation – Middlesex Street Estate

The City of London Corporation (the Corporation), as landlord, has a legal obligation under Section 105 of the Housing Act (1985) to consult with residents on the Middlesex Street Estate as to whether the surplus space in the Estate's car parks, ground floor service yard and shop units on Gravel Lane are still required for housing purposes.

The Section 105 consultation period took place from 4 to 31 July; on 2 July, all residents and commercial tenants received a comprehensive information letter, a questionnaire and some preliminary plans, to ensure that as many residents and commercial tenants as possible were able to engage with the consultation. Information on the consultation is set out below:

- There was a public event held at the Artizan Street Library on the afternoon and evening of 12 July.
- All information was also available to view at www.mse-project.co.uk.

- The questionnaire asked "What do you think about the City of London Corporation's proposal to take part of the Middlesex Street Estate's car parks and six shop units out of housing use?"
- Respondents were also able to submit their feedback online.
- The public event was attended by 23 residents and commercial tenants, as well as a representative from the Department of Community and Children's Services and two representatives from Comm Comm UK, appointed by the City of London Corporation to undertake communications activity, including community and stakeholder engagement.

The City of London Police (CoLP) already occupies a secure compound in the basement car park at the Middlesex Street Estate, and residents and commercial tenants were aware of a proposal by the Corporation to build a larger facility for CoLP in areas of the basement, ground floor service yard and vacant first floor car park, as well as in six of the shop units on Gravel Lane.

Consequently and understandably, residents and commercial tenants were keen to know more about the plans for this proposal, and many were frustrated that no additional information was available. The Section 105 Consultation was intended to deal solely and specifically with the surplus space and potential change of use of the space. The consultation was not intended to deal with the Corporation's proposal for an extension of CoLP's occupation of areas in the Estate.

The consultation generated 51 pieces of feedback, through a mixture of online submission of the questionnaire, handwritten submissions at the public event, postal submissions emails and telephone calls.

Officers have produced the attached response document, which will be issued tomorrow, 12 August, to all residents and commercial tenants of the Middlesex Street Estate. It seeks to answer some of the questions submitted during the consultation period, but as I am sure you will understand, it is limited considerably by the scope and requirements of the Section 105 consultation.

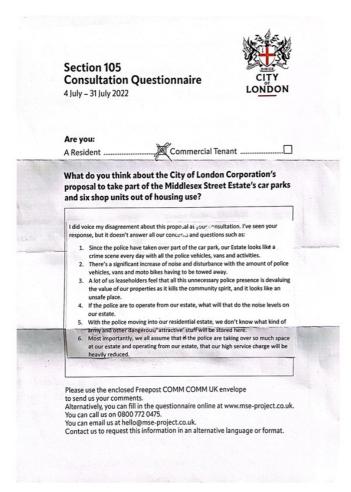
With regard to the Corporation's proposal for CoLP, it is expected that public consultation will take place later this year in respect of the planning application. No date has yet been set, however. It is intended that there will be two public events to support the consultation process. These two public events and the wider planning consultation will address many of the questions asked by residents that we have been unable answer through the Section 105 Consultation. It must be noted however, that it is unlikely that all questions would be answered due to security and other sensitive operational matters.

I trust that you find this information helpful, however should you require any further information, please do not hesitate to contact me directly.

With best regards

APPENDIX G

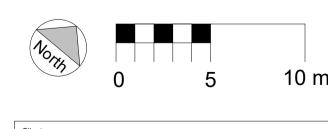
Feedback form received from a resident in the post on 26 September 2022. Included here for transparency, but has not been quoted anywhere else in this document.



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1st Floor - Key Plan 1:200



City of London Corporation
City of London

City of London Guildhall, London, PO Box 270 EC2P 2EJ www.cityoflondon.gov.uk

www.cityoflondon.go

Proposed Development

CITY LONDON

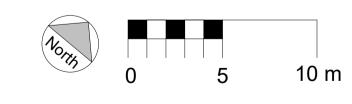
Petticoat Square Middlesex Street Estate London E1 7EA

Stage:
Consultation

Sultability.

1st Floor Plan - Proposed Site Area

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City of London Corporation City of London Guildhall, London, PO Box 270 EC2P 2EJ www.cityoflondon.gov.uk

Gravel Lane

10

14

16

18

Stair + Lift

Proposed Development

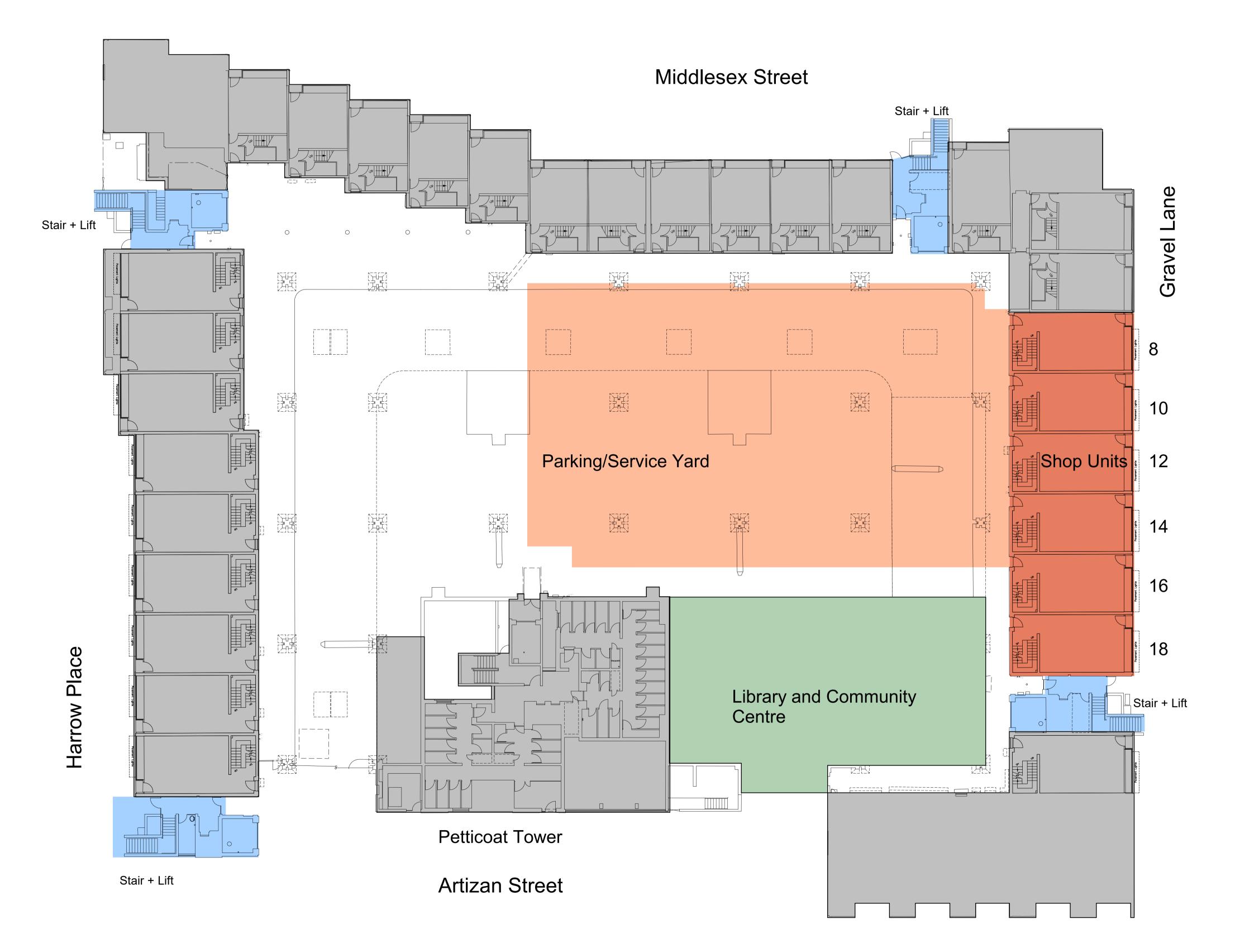
Petticoat Square Middlesex Street Estate London E1 7EA

Stage:
Consultation

CITY LONDON

Basement Plan - Proposed Site Area

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Ground Floor - Key Plan 1:200



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Committee(s):	Dated:
Finance Committee – For Decision	15 November 2022
Special Meeting of Community and Children's	
Services – For Information	
Capital Buildings Board – For Information	
Subject: - Middlesex Street Estate - Allocation of Funds	Public
for Housing Purposes	
Which outcomes in the City Corporation's Corporate Plan	4, 5, 12
does this proposal aim to impact directly?	
Does this proposal require extra revenue and/or capital	Υ
spending? Y/N	
If so, how much?	Recommendation - £3.45m
What is the source of Funding?	Eastern Base project budget
	(still to be agreed by the
	Court of Common Council,
	following approval from
	Policy & Resources
	Committee on 20 October)
Has this Funding Source been agreed upon with the	Subject to approval by
Chamberlain's Department?	Finance Committee
Report of:	
	For Information
Chamberlain	
Report author: Ola Obadara, Property Projects	
Director & Peter Sebastian, Assistant Director,	
Strategic Finance	

Summary

Members will be aware of the proposed alteration and refurbishment of the vacant and underutilised part Basement, part Ground, whole of the 1st floor and 6 retail units at Middlesex Street estate and car park (MSCP), to provide an Eastern Base for the City of London Police (COLP).

The proposed use for police purposes is subject to Community and Children's Services committee resolving that the areas of the Middlesex Street Estate proposed for police use including the 6 retail units (together the "MSCP") are not required for housing purposes.

Community and Children's Services (C&CS) committee would like to achieve appropriate benefit for the Housing Revenue Account (HRA) and housing purposes following this appropriation. This paper summarises advice from officers on potential levels of compensation for the HRA and/or provision of ring-fenced capital to be used for housing purposes, based on an independent valuation of the site. A special public meeting of C&CS on will be heard 15 November to agree the surplus declaration pending the decision of this report.

This report reviews the following questions:

- 1. Is the City Fund required to compensate the HRA for this vacant possession?
- 2. If so, how much compensation should be provided. Alternatively or in addition, should a capital sum be provided for housing purposes and if so what sum?
- 3. If agreed, what is the funding source?

This paper covers these questions and requests **Finance Committee** to consider an appropriate sum to be ring-fenced for housing.

Recommendations

Members of Finance Committee are requested to approve that

- 1. A sum should be ring-fenced for housing purposes should MSCP be declared surplus to housing purposes
- 2. The sum of £3.45m should be recommended to the Capital Buildings Board and C&CS Committee being the independent "fair market" valuation from options ranging from £0.8m to £4.7m. (paragraph 5)
- 3. This sum should be found from within the Eastern base project budget (paragraphs 6-7)

Main Report

Background

- 1. A proposal is being explored to convert part of the MSCP to provide an Eastern Base for the COLP. COLP already occupy part of the basement of the Car Park under a Memorandum of Understanding (MOU). There is an expectation from members of C&CS Committee that the HRA should receive benefit for the proposed Police use, noting the interests of estate residents and the equitable argument that HRA should not lose out by freeing up space for a Corporation department in comparison to a third party. An Independent Valuation was commissioned and is included at Appendix C to this report.
- 2. The Chairman and Deputy Chairman of the Finance Committee believe that it would be appropriate to ring-fence such sum for housing purposes ideally on a capital basis which also offers the advantages of simplicity and that the figure should be based on fair market value as if such negotiation was conducted on an arms length basis..
- 3. There is actually no legal requirement for any compensation or consideration since the appropriation is not a disposal/sale to a different legal entity. However, it feels entirely fair that HRA (and thus, the City's residential tenants) should not incur a net loss arising from the appropriation.

Should a sum be ring-fenced for housing (or credited to the HRA) following appropriate appropriation?

- 4. In support of this action, members may wish to consider the following:
 - earlier proposals for part of the car park to be commercially let;
 - the saving to the police accommodation budget of using land already owned by the City Corporation;
 - the urgent need to finance works to the podium at the Middlesex Street Estate;
 - the need to avoid prejudicing the HRA from loss of net income which would otherwise be generated from the car park; and
 - the wider interest in ensuring any proposed police use is successfully integrated into the local community for benefit of both residents and the CoLP.

How much compensation should be paid?

- 5. The amount of funding to be provided should be subject to this discussion at this committee. There are three options for compensation, ranging from £0.8m to £4.7m. These options are:
 - a. Covering lost rental income £0.8m (this relates to £40k net rental income each year (based on the site's current use) over the 20 year period in which this site will be used by the COLP)
 - b. Maximum commercial development value £4.7m. This is in line with the Valuation Report assessment of the maximum commercial development value of £4.7m (included in Appendix 1)
 - c. Market (fair) value £3.45m. Fair value is the receipt the HRA would expect in a sale to a third party. This appears to be the most equitable approach to agreeing compensation and is based on the independent valuation attached in Appendix 1. This is the amount recommended to the Finance Committee.

Financial implications – from where should the sums be funded?

- 6. At the Policy & Resources Committee on 20 October it was agreed to allocate an additional £60.4m for Future Police Estate Portfolio funding (which included the construction of the Eastern base, subject to full approval by the Court of Common Council). This amount is to allow for the construction of the police accommodation at the Salisbury Square site.
- 7. Finance Committee is, separately to this paper, reviewing its contingency budgets. There is not currently sufficient contingency to set aside for this purpose. While it is the City of London Police that are receiving the benefit of this site, it is the Corporation's policy that the Police are not charged rental income for office space. Therefore, it is envisaged that the capital sum to be ring-fenced in the General Fund in recognition of the considerations in paragraph 4 would be found within the £60.4m sum agreed for the Future Police Estate Portfolio.

Legal implications

8. These are included in the body of the report.

Risk implications

9. Delay in agreeing the appropriation surplus declaration is costing the corporation. A full design team has been appointed to work on the designs and submit a planning application for the scheme.

Equalities implications

10. None identified in addition to those reported to Capital Buildings Board.

Climate implications

11. None identified in addition to those reported to Capital Buildings Board.

Security implications

12. None identified in addition to those reported to Capital Buildings Board.

Conclusion

13. Members are requested to review and comment on the recommendations contained in this report.

Appendices

Appendix 1 – Valuation report – non public

Appendix 2 – Briefing – Middlesex Street Estate / Police Eastern Hub – non public

Agenda Item 6

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.



Agenda Item 7

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

