GREATERLONDONAUTHORITY

planning report GLA/1200cd/10 21 February 2022

Bishopsgate Goodsyard

in the London Boroughs of Hackney and Tower Hamlets

planning application nos. 2014/2425 & PA/14/02011 listed building consent application nos. 2014/2427 & PA/14/02096

Planning and connected listing building consent applications

Town & Country Planning Act 1990 (as amended); Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 ('2008 Order').

Strategic issue

To consider any material changes to policy, planning guidance and site circumstances since the Mayor's resolution to grant planning permission on 3 December 2020 and to extend the time period for completion of the Section 106 legal agreement to 28 March 2022.

Recommendation

That the Mayor:

- Agrees that the policy and guidance changes since the Representation Hearing do not materially affect the resolution to grant planning permission and listed building consent made on 3 December 2020.
- ii. Agrees to an extension of time for the completion of the Section 106 legal agreement (i.e. the period after which the Head of Development Management or the Executive Director of Good Growth have delegated authority to refer it back to the Mayor in order to refuse permission if the Section 106 legal agreement is not completed).
- iii. Agrees with the final wording of the Section 106 legal agreement and draft planning conditions noting that there have been changes to the wording in light of the policy and guidance changes since the Representation Hearing.

Context

- On 3 December 2020, the Mayor, acting as local planning authority, resolved to grant conditional planning permission and listed building consent in respect of these applications subject to the prior completion of a Section 106 legal agreement.
- The Mayor also gave delegated authority for the Head of Development Management to negotiate the Section 106 legal agreement and to refer the application back to the Mayor should the Section 106 agreement not be completed by 3 March 2021. The Deputy Mayor, acting under delegated authority, in June 2021 subsequently agreed to extend this time period until 3 August 2021.

- The applications were referred to the Secretary of State (SoS) for Housing, Communities and Local Government who confirmed that he did not wish to call in the applications.
- The Section 106 obligations set out in the Representation Hearing Report and all necessary conditions have now been agreed. Some amendments were necessary in response to the publication of the new London Plan, as discussed below.

Planning policy and guidance update

5 There have been a number of changes to policy and guidance since the Representation Hearing that must be considered, as discussed further below.

National Planning Policy Framework

- A revised National Planning Policy Framework (NPPF) was published on 19 July 2021. Alongside minor and superficial changes, the new NPPF includes changes to the following areas (2021 NPPF paragraph numbers):
 - Paragraph 11(a) reference to sustainable development addressing climate change in plan-making.
 - Paragraph 22 Reference to new settlements or village extensions.
 - Paragraph 53 Amended criteria to the use of Article 4 directions.
 - Paragraph 73 Reference to well-designed and beautiful homes in housing delivery.
 - Paragraph 96 Requirement for LPA's to work proactively and positively with public service infrastructure providers, such as further education colleges, hospitals and criminal justice accommodation.
 - Paragraph 110 Reference to the new National Design Guide and the National Model Design Code.
 - Paragraph 125 Reference to area-based character assessments, design guides and codes, and masterplans in creating beautiful and sustainable places.
 - Part 12 Reference to the new National Design Guide and the National Model Design Code for achieving well designed spaces, as well as tree planting.
 - Paragraphs 159-169 Amendments to planning for flood risk and sustainable drainage.
 - Paragraph 198 Need to consider the importance and retention of historic statues, plaques, memorials or monuments.
 - Subsequent Amendments to Annex 1 (Implementation) and Annex 3 (Flood risk vulnerability classification) to account for the above.
- The application and the Representation Hearing Report have been considered against the above amendments to the 2021 NPPF. Relevant matters relating to design, tree planting, public service infrastructure, and flood risk and sustainable drainage were addressed in the Representation Hearing Report.

- All aspects of the design of the scheme are considered in depth in paragraphs 337-430 of the Representation Hearing Report. The Report concluded that the proposals would deliver a cohesive new mixed-use quarter for this key central London site, incorporating a variety of well-considered buildings and spaces designed by a diverse mix of leading architectural practices, and appropriately integrating the built heritage of the site.
- As required by the 2021 NPPF, the detailed components of the scheme, together with the Design Code and Parameter Plans that would inform the detailed assessment of Reserved Matters applications for outline phases, will create high quality, beautiful and sustainable buildings and places that will function well and add to the overall quality of the area over the lifetime of the development. The Representation Hearing Report fully responds to the ten characteristics of well-designed places identified in the National Design Guide and the National Model Design Code.
- 10 The proposals include extensive tree planting which contributes significantly to the urban greening of the site, as discussed in paragraphs 553-559 of the Representation Hearing Report.
- 11 The scheme would deliver public service infrastructure through the S106 Agreement, including new community and cultural space, public open space and public conveniences. It would also contribute over £7 million towards new bus infrastructure, highway works and cycle infrastructure. Mayoral Community Infrastructure Levy (CIL) payment of £33,036,111 (with anticipated affordable housing relief of £6,169,660) is also expected, whilst the Hackney CIL payment is estimated to be £8,291,758 and Tower Hamlets CIL payment estimated at £17,930,490 (with anticipated affordable housing relief of £6,169,660). The local CIL payments could be used to fund improvements to health and education facilities in the local area.
- 12 The application has been rigorously assessed in terms of flood risk and sustainable drainage by the GLA, the Councils, and independent environmental consultants, as discussed in paragraphs 545-548 of the Representation Hearing Report, and the Environment Agency made no objection.
- 13 The amendments to the NPPF are not considered to alter the recommendation outlined in the Representation Hearing Report. NPPF paragraph numbers in the Representation Hearing Report are those from the 2019 NPPF, which have been amended in the 2021 NPPF.

New London Plan

- 14 At the time of the Representation Hearing, the new London Plan was in Intend to Publish form and had been sent to the SoS alongside a schedule of the Panel Inspector's post-EiP recommendations, and the Mayor's response to them.
- 15 On 10 December 2020, the SoS issued a series of Updated Changes and two further Directions. In terms of the two further Directions under Section 337 of the Greater London Authority Act 1999 (as amended), Direction DR4 (specifically regarding updated para 6.4.8 under Policy E4 (Land for Industry)) is not considered

- to be relevant to these particular applications; however, Direction DR12 concerns Policy D9 (Tall Buildings), which is relevant, as discussed further below.
- 16 On 21 December 2020, the Mayor submitted to the SoS his Publication London Plan with amendments designed to address all Directions.
- 17 On 29 January 2021, the SoS confirmed that he had no further matters to raise and that the Publication London Plan (December 2020) conformed with the previous Directions and could now be published.
- 18 On 2 March 2021, the new London Plan was published (2021 London Plan). Accordingly, the Plan now has full statutory weight requiring an update to the assessment originally undertaken as the previous London Plan (2016) has been superseded.

Changes made through Updated Changes

- 19 In terms of the Updated Changes since the Representation Hearing, of particular relevance to these applications are Directions DR1 (Policy H10 Housing size mix) and DR2 (Policy D3 Optimising site capacity).
- In relation to DR1, the SoS directed additional wording to Policy H10 to better emphasise the need for additional family housing across London. Paragraphs 314-319 of the Representation Hearing Report addressed policy compliance in relation to housing mix; and paragraph 318 notes that the low level of family housing in the market housing component of the scheme is a point of objection from Tower Hamlets Council. In line with the recommendations of the Council, a condition has been proposed to require a housing mix strategy to be approved and implemented. This approach is considered to address the Council's concerns and addresses the additional wording inserted by the SoS into Policy H10. As such the application remains in accordance with this policy.
- 21 Concerning DR2, Policy D3 seeks to optimise site capacity, ensuring that development is of the most appropriate form and land use for the site. Paragraphs 344-348 of the Representation Hearing Report address density and site optimisation. As a result of the Updated Changes, Policy D3(B) now states that:
 - "Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate."
- 22 GLA officers consider that the proposal is the most appropriate form and land use for the site. The proposals are of a high density and in a very well-connected central London location. The proposals are within a context of existing high density development, within the Central Activities Zone and an Opportunity Area, and will deliver an appropriate mix of uses, which all support a high density scheme. The land uses, including office, residential, community, and retail uses, meet identified

needs and are in line with the local plan site allocations. As such, the application remains in accordance with Policy D3.

Changes made through further SoS Direction

- The SoS Direction DR12 regarding Policy D9 (Tall Buildings) primarily sought to ensure that tall buildings are only brought forward in appropriate and clearly defined areas, as determined by boroughs. Intend to Publish London Plan Policy D9(B3) already stated that "Tall buildings should only be developed in locations that are identified in Development Plans", however, the SoS considered that the policy should go further and following his Direction, London Plan Policy D9(B3) now states that "Tall buildings should only be developed in locations that are identified as suitable in Development Plans". (the new words inserted as a result of the SoS's Direction are underlined and in italic). Policy D9 also identifies that boroughs should define what is considered a tall building for specific localities, which should not be less than 6 storeys or 18 metres; identify appropriate heights on maps in development plans. Supporting paragraph 3.9.3 states that "in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context".
- The Representation Hearing Report sets out at paragraphs 359-369 the policies for tall buildings. The report notes that the proposed tall buildings would be acceptable in principle in terms of their location in both boroughs and that there was no conflict with this component of the then draft Policy D9. Considering the amended wording of Policy D9 following the SoS Direction and subsequent adoption of the London Plan, it is noted that both local plans do not currently follow the prescriptive approach envisaged i.e. they do not identify areas as suitable for tall buildings. Hackney Council's Local Plan Policy LP1 states that Area Action Plans (AAPs) will include a building heights strategy for certain places and the draft Future Shoreditch AAP covers this site. Tower Hamlets Local Plan Policy D.DH6 states that "tall buildings will be directed towards designated Tall Building Zones" (Part 2) (none of which encompass this site) but under Part 3 supports them elsewhere, subject to meeting a series of criteria, all of which this scheme would satisfy. Furthermore, the site allocation recognises that "larger-scale buildings" will come forward on the site, and directs them around Shoreditch High Street Overground station.
- 25 In view of the respective borough policy positions, which have not been drafted in the context of the 2021 London Plan, GLA officers consider that the applications do not strictly comply with Part B of Policy D9 as there aren't areas designated "as suitable" for tall buildings within either Local Plan. As such, having regard to the additional wording inserted through the SoS Direction, GLA officers consider that the applications do not comply with Part B of London Plan Policy D9 in terms of the locational stipulation.
- 26 The failure to comply with Policy D9 part B has to be balanced against the scheme as a whole including the acceptable visual, functional, environmental and cumulative impact assessment detailed below as required by part C of Policy D9.
- 27 As confirmed within paragraph 362 of the Representation Hearing report, the proposed tall buildings would; not harm views (criteria C1a); as a group, reinforce the spatial hierarchy by stepping down height from east to west (criteria C1b); incorporate the highest standards of architecture (criteria C1c); avoid harm to

heritage assets where possible and provide clear benefits to outweigh any harm (criteria C1d); not harm the Tower of London World Heritage Site (criteria C1e); not cause adverse glare (criteria C1g); and be designed to minimise light pollution (criteria C1h). In terms of functional impacts; internal and external design has been well-considered and incorporated in the Design Code for the outline component (criteria C2a); servicing arrangements are acceptable with appropriate mitigation (criteria C2b); the movement network and entrance capacity is well-resolved (criteria C2c); transport capacity is sufficient (criteria C2d); the scheme maximises regeneration benefits to the area (criteria C2f); and would not interfere with communications or renewable energy generation (criteria C2g). Environmental impacts are acceptable (criteria C3) and cumulative impacts (criteria C4) have been appropriately considered. The absence of public access to upper floors (part D) is acceptable given the extensive public realm and open space proposed.

The proposed development is not in an area deemed in the development plan as suitable for tall buildings as required by London Plan Policy D9(B). However, when considering the acceptable visual, functional, environmental and cumulative impact of the proposed buildings as assessed above, as required by part C of Policy D9, officers consider that the failure to comply with policy D9 part B is outweighed.

Changes to London Plan Guidance

- 29 The following supplementary planning guidance (SPG), strategies and other documents were revoked upon publication of the 2021 London Plan and are no longer relevant:
 - Culture and Night-Time Economy (November 2017)
 - Central Activities Zone (March 2016)
 - Sustainable Design and Construction SPG (April 2014)
 - Land for Industry and Transport SPG (September 2012)
- 30 The following London Plan Guidance has been adopted following the Representation Hearing:
 - Public London Charter (October 2021)
 - Be Seen' Energy Monitoring Guidance (September 2021)
- 31 The following draft London Plan Guidance was published for consultation following the Representation Hearing:
 - Good Quality Homes for all Londoners (October 2020)
 - Circular Economy Statement Guidance (October 2020)
 - Whole Life-Cycle Carbon Assessments (October 2020)
 - Urban Greening Factor (September 2021)
 - Sustainable Transport, Walking and Cycling (September 2021)
 - Air Quality Positive (November 2021)
 - Air Quality Neutral (November 2021)
- 32 The following pre-consultation London Plan Guidance was published following the Representation Hearing:

- Fire Safety LPG (March 2021)
- Optimising Site Capacity: A Design-led Approach LPG (October 2020)
- Housing Design Standards LPG (October 2020)
- 33 The changes to London Plan Guidance is not considered to alter the recommendation outlined in the Representation Hearing Report; however, changes to planning conditions and Section 106 obligations have been secured in response to this guidance, as discussed below.

Hackney Council

34 The Council's Local Plan has not changed since the original resolution was made. In addition, there have been no new local supplementary planning documents or guidance published since the Representation Hearing.

Tower Hamlets Council

- 35 The Council's Local Plan has not changed since the original resolution was made, with the exception of the publication of the draft Leaside AAP for consultation, which does not affect this site.
- The Council published its updated Planning Obligations SPD on 24 March 2021. The SPD provides updated guidance on the Council's approach to securing planning obligations and, given its publication during S106 discussions, has been used by Council and GLA officers in negotiating the planning obligations that have been secured. As such the application is considered to be broadly in accordance with this SPD.
- 37 The Council published its High Density Living SPD on 16 December 2020. This SPD provides guidance on matters relating to high density residential development. GLA officers consider that the design, residential quality and environmental matters covered by this SPD have been appropriately considered within this high density scheme. In this context, it is noted that the housing lies within the outline component of the applications with much of the detail to follow at Reserved Matters stage. As such the applications would comply with this SPD.
- 38 The Council published its Reuse, Recycling & Waste SPD on 28 July 2021. This SPD provides guidance on how waste management should be addressed in new residential and mixed use developments. GLA officers consider that the proposed development appropriately responds to the guidance within this SPD in terms of provision of appropriate storage for and collection of waste. In this context, it is noted that the housing lies within the outline component of the applications with much of the detail to follow at Reserved Matters stage. As such the applications would comply with this SPD.
- 39 The Council is also working on draft guidance for consultation, notably the Tall Buildings SPD, which will be relevant to this scheme. However, the Tall Buildings SPD has only undergone pre-consultation workshops and can therefore only be afforded very limited weight at this stage.
- 40 In August 2021 the Council decided to send the Spitalfields Neighbourhood Plan to referendum. The Plan excludes the majority of this site but does include a very

small part of Plot 3. It also covers areas immediately adjacent to the south and east. GLA officers have reviewed the referendum version of the Plan but have concluded that it does not alter the recommendation outlined in the Representation Hearing Report.

Changes to planning conditions and Section 106 obligations

- 41 Following the publication of the new London Plan (March 2021) there are several new policies which now attract full weight. Where required by new policy, additional planning conditions (Annex 1 Draft Decision Notices) and section 106 obligations (Annex 2 Draft Section 106 agreement) have been secured.
- 42 Policy D5 of the 2021 London Plan (part B5) requires that all developments where lifts are installed, have as a minimum at least one lift per core (or more subject to capacity assessments) which would be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. The detailed component of the scheme includes such lifts on the submitted drawings and the remaining phases will be fully designed at Reserved Matters stage, at which point demonstration of compliance with the requirements of London Plan Policy D5 part B5 can be confirmed.
- The S106 obligations will ensure that the principles of public access to the public spaces will be secured, in line with the draft Public London Charter and Policy D8 (part H). Policy D8 (part O) requires the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm. A condition secures a scheme for the provision and future management of free drinking water in the public realm to be delivered prior to the commencement of Plot 7.
- 44 Policy D12 (part B) requires submissions of a Fire Statement produced by a third party, suitably qualified assessor. As referenced in the Representation Hearing Report, this was provided for Phase 1 and secured by condition, with an outline Fire Statement for later phases. A condition also secures the submission of a Fire Statement for each phase prior to commencement.
- 45 Policy S6 requires large-scale developments that are open to the public, and large areas of public realm, to provide and secure the future management of free publicly-accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities, and free 'Changing Places' toilets. This has been secured by Section 106 agreement, to be delivered as part of Plot 10.
- Policy SI1 (part C) requires all large scale developments subject to EIA to submit an Air Quality Positive Statement (AQPS) and the Mayor has recently published draft pre-consultation guidance on this topic. A condition is recommended to ensure that an AQPS is submitted prior to commencement of each phase, setting out the measures that can be implemented as part of an air quality positive approach.
- 47 Policy SI2 requires major development proposals to include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy, verify and report on energy performance and calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle

Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. Given the adopted local plan policy positions at the time of the Representation Hearing, this was addressed in the Representation Hearing Report and zero-carbon has been secured as part of the Section 106 agreement, with future phase contributions to be calculated by the submission of updated energy strategies for each phase. Planning conditions and Section 106 obligations to verify and report on energy performance and whole life-cycle carbon emissions have also been applied. As such, the proposals meet the requirements of Policy SI2 of the London Plan.

- 48 Policy SI6 of the 2021 London Plan requires a number of measures to ensure London's global competitiveness, including the provision of sufficient ducting space for full fibre connectivity infrastructure and providing for mobile connectivity. A condition has been applied requiring detailed plans to be submitted and approved by the local planning authority prior to commencement of each building, demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure.
- 49 Policy SI7 of the 2021 London Plan requires a Circular Economy Statement to be submitted. As referenced in the Representation Hearing Report, this was provided and conditions have been applied requiring a detailed Circular Economy Statement and Operational Waste Management Strategy for each phase, as well as post-completion monitoring reports.

Changes to site circumstances

50 It is noted that a list of schemes was considered as part of the cumulative impact assessment in the applicant's Environmental Statement and that a number of these have progressed e.g. in terms of achieving planning consent or further progress on site. GLA officers consider that the change in circumstances in the immediate vicinity of the site does not materially affect the Mayor's previous resolution to grant planning permission.

Other material considerations

First Homes

- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. First Homes are a Discount Market Sale (DMS) housing product which meet the NPPF definition of affordable housing. To qualify as First Homes within London, homes should have a minimum 30% discount to market value secured in perpetuity through S106 agreement. On first sale, these homes must have a purchase price that does not exceed £420,000 after the discount has been applied. First Homes are to be sold to first time buyers with an annual gross household income no greater than £90,000. A minimum of 50% of the purchase price must be met through obtaining a mortgage. The WMS states that a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes.
- 52 First Homes is a national policy requirement, like others set out in the NPPF or introduced through Written Ministerial Statements. This means that the First Homes requirement is a material consideration for decision makers to take into account

alongside policies of the Development Plan and any other relevant material considerations. However, the WMS does not alter the position of the Development Plan as the starting point for decision-taking.

- In relation to decision making, the national policy requirement for First Homes is subject to transitional arrangements as set out in the WMS and Planning Practice Guidance. The national policy requirements do not apply to:
 - Sites with full or outline planning permission in place or determined (or where a right to appeal against non-determination has arisen) before 28 December 2021
 - Applications which are determined before 28 March 2022 and which have been subject to significant pre-application engagement. This is defined in the PPG as any substantive discussions between the local planning authority and the applicant relating to the proposed quantity or tenure mix of the affordable housing contribution associated with that application.
- 54 The First Homes national policy requirement does not apply to this application, given the transitional arrangements. A right to appeal against non-determination arose before 28 December 2021 and there has been significant pre-application engagement.

Representation update

55 Since the Representation Hearing on 3 December 2020, 6 letters/emails of objection and 2 letters/emails of support have been received which have raised the following comments:

Objection:

- Insufficient affordable housing
- Lack of green space
- Out of character with the area and excessive bulk and scale of buildings
- Harm to historic buildings, conservation areas and heritage
- Limited benefits of the scheme and uses proposed not appropriate
- Proposal would impact community spirit with high rise developments
- The development should be reviewed in light of Covid as demands will change.
- Poor design and architecture
- · Gentrification of area and driven by profit.
- Overshadowing of neighbours
- Loss of light to neighbours

Support:

- The proposal would breathe life into beautiful old architecture
- Will create a new destination for London
- Affordable housing is a benefit
- 56 These matters were considered fully in the Representation Hearing Report and raise no further material considerations.

- 57 All those that requested to speak at the Representation Hearing; anyone who has asked for clarification on the next steps in the decision-making process; the Council; and the Applicant have been notified of the process for reconsideration of the application. All those notified have been provided with a link to this report which has been published on the GLA's website.
- Noting that the 'Intend to Publish' version of the London Plan was considered at the Representation Hearing and given the extent of changes arising from the adoption of the new London Plan / guidance, the extent of further notification carried out and the process for reconsideration of the application by way of update, as opposed to a further Representation Hearing, is considered to be in accordance with the requirements of fairness.

Legal considerations

59 Under the arrangements set out in Article 7 of the 2008 Order and the powers conferred by Section 2A of the Town and Country Planning Act 1990 the Mayor is acting under delegated authority as the Local Planning Authority for the purposes of determining this planning application and connected listed building consent application.

Planning balance

- As discussed above, the 2016 London Plan that was in place at the time of the Representation Hearing has been superseded by the adoption of the 2021 London Plan, so the policies of the 2016 London Plan are no longer relevant. As well as the adoption of the new London Plan and the policies within it now having full weight, the key changes to the wording of the policies is set out above. Further consideration of additional/amended conditions and/or Section 106 obligations to ensure compliance with other requirements of the 2021 London Plan and other quidance documents are also addressed in this report.
- The Representation Hearing Report concluded that the proposals were contrary to Hackney Local Plan Policies LP2 and LP29, Tower Hamlets Local Plan Policies S.DH1 and D.DH8, London Plan Policy 7.6 (now no longer part of the development plan) and Intend to Publish London Plan Policy D6 (now part of the development plan). Conflicts with heritage-related policies were also identified in paragraph 667, although the NPPF paragraph 196 balance was favourable to the proposals. Overall GLA officers considered that the application was contrary to the development plan when considered as a whole, but that this was outweighed by material considerations and, as such, approval of the applications was recommended.
- As discussed above, now that the SoS Direction DR12 is incorporated into published 2021 London Plan Policy D9, the proposals do not comply with Part B of this policy, in respect of the principle of the tall buildings proposed in this location. However, the proposal complies with part C of Policy D9 as the visual, functional, environmental and cumulative impact of the proposed development is considered acceptable. This, along with the material considerations set out in paragraphs 675-678 of the Representation Hearing Report, are still considered to indicate approval of the scheme. As such, it remains the view of GLA officers that material considerations indicate that planning permission and listed building consent should be granted.

Conclusion and officer recommendation

63 The Mayor, acting as the local planning authority, has considered the particular circumstances of this application against national, strategic and local planning policy, relevant supplementary planning guidance and all material planning considerations. He has also had regard to the comments of the Councils and all consultation responses and representations made on the case both to the Councils and the GLA. Accordingly, the recommendations at the beginning of this report are proposed.

Annexes

Annex 1 – Draft Decision Notices

Annex 2 – Draft Section 106 Agreement

Decision record - recommendation agreed/refused

Sadiq Khan

Mayor of London

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