



Planning and Transportation Committee

ADDENDUM 2

Date: TUESDAY, 26 OCTOBER 2021
Time: 10.30 am
Venue: LIVERY HALL - GUILDHALL

4. **CUSTOM HOUSE 20 LOWER THAMES STREET & RIVER WALL, STAIRS AND CRANE, CUSTOM HOUSE QUAY LONDON EC3R 6EE**
Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 3 - 182)

5. **120 FLEET STREET LONDON EC4A 2BE**
Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 183 - 192)

Items received too late for circulation in conjunction with the Agenda.

John Barradell
Town Clerk and Chief Executive

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Planning & Transportation Committee – 26th October 2021

Addendum for Agenda item 4

Planning applications 20/00631/FULMAJ and 20/00632/LBC: Custom House

Updated Recommendation

- A. The following refusal reason is recommended as the applicant has not demonstrated that adequate urban greening would be provided and therefore the development does not achieve a suitable urban greening factor as per paragraphs 623 – 626 of the published committee report.

Reason for refusal 13 Urban Greening:

It has not been demonstrated that the proposed development would achieve an adequate urban greening factor or that urban greening has been optimised on this site contrary to London Plan Policy G5, whilst having regard for emerging City Plan Policy OS2.

- B. It is recommended that authority be delegated to the Chief Planning Officer and Development Director to inform the Planning Inspectorate of modified Reasons for which the City Corporation would have refused the permission (were it empowered to determine it) in response to any further information that may be provided by the Applicant.

Additional late representations

- C. The Greater London Authority (GLA) have submitted an updated Stage 1 report. This is appended to this addendum report, but can be summarised as follows:
1. **Principle of development:** Notwithstanding GLA officers support for the change of use of the office building to provide other strategic functions of the CAZ (namely hotel, cultural and retail uses) as well as the provision of public space, the proposal is not supported in strategic planning terms in view of the proposed restrictions to public access to the quayside and the absence of a final public access management plan as required by London Plan Policy D8 and Public London Charter LPG (paragraphs 19-30).
 2. **Transport:** A public access management plan should be secured by planning condition or in a Section 106 agreement; and, improvements need to be made to ensure greater public use of the quayside, which is required in order to represent the fullest contribution to a high quality public realm, and therefore to fully justify the use of the TLRN for servicing, as opposed to servicing taking place within the site (paragraphs 33-36).
 3. **Sustainable development and Environment:** Additional information relating to operational waste, recycling and waste reporting and end of life strategy is required for the circular economy and a commitment to post-completion reporting should be secured. The applicant should also explore additional greening measures to improve the scheme's UGF score (paragraphs 37-41).

4. **Recommendation:** That City Corporation be advised that the application does not currently comply with the London Plan for the reasons set out in paragraph 45. Where the associated concerns within this report are addressed, the application may comply with the London Plan.
- D. Correspondence from Environment Agency has been received to advise on closures of the Quayside for events (forwards of the flood defence wall) should not be an issue in relation to flood risk and safety but have suggested the following in addition to advice covered in earlier letters of response:
1. The events space will be located in front of the flood defences and we anticipate that the area would flood a number of times a year. If this space is to be used for events and for public access then the applicant would need to ensure that the area is not accessible to users/ the public when flooding is predicted. The applicant would also need to have a way of communicating this to event organisers and attendees. In addition, a Public Safety Risk Assessment should be undertaken so that the applicant can ensure that the proposed flood defence layout does not pose a danger to the general public or compromise access. No structures should be placed in this area (both temporary and permanent) and the applicant should be aware that a Flood Risk Activity Permit may be required for some of the events.
- E. A further 58 letters of representations have been received in objection to the scheme. These are not considered to raise any further matters of objection to those listed on pages 101-104 of the committee report.
- F. SAVE Britain's Heritage have submitted a further letter of objection to the scheme. This is included in full as an appendix to this addendum report, but can be summarised as follows:
1. Custom House is a Public Building with a long history of public access, equivalent to Somerset House
 2. Public access is critical to conserving its significance as a heritage asset
 3. Public access to the interior (including the Long Room) and to the Quayside Terrace is critical to securing the City Corporation's vision for regenerating the Riverside
 4. The current proposals do not provide adequate permanent unencumbered public access to the interior or to the Quayside Terrace
 5. The potential requirements of the hotel for private and exclusive events appear to take precedent over public access
 6. The lack of adequate public access is harmful to the significance of the building
 7. The proposals involve the loss of unique historic fabric in the West Wing
 8. The glazed roof pavilions harm the appearance of the building
 9. The public benefits offered by the applicant do not outweigh the harm caused by the proposals
 10. SAVE will make sure these concerns are raised at any public inquiry

GREATER LONDON AUTHORITY

Good Growth

Sonia Williams
Principal Planning Officer
Department of the Built Environment
City of London
PO Box 270, Guildhall
London EC2P 2EJ

Our ref: 2020/6584/S1/02
Your ref: 20/00631/FULMAJ
Date: 18 October 2021

By Email

Dear Sonia

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

Custom House, 20 Lower Thames Street, London EC3R 6EE

Local Planning Authority reference: 20/00631/FULMAJ

I refer to the copy of the above amended planning application, which was received from you on 25 August 2021. On 18 October 2021 Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference 2020/6584/S1/02. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 45 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Corporation subsequently resolves to approve the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Corporation under Article 6 to refuse the application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Corporation resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Corporation may therefore proceed to

determine the application without further referral to the Mayor. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, email GavinMcLaughlin@tfl.gov.uk.

Yours sincerely



John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Lucinda Turner, TfL
Lucy Battersby, Montagu Evans LLP, 5 Bolton Street, London, W1J 8BA

Custom House, 20 Lower Thames Street

in the City of London Corporation

local planning authority reference 20/00631/FULMAJ

Strategic planning application stage 1 referral

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

The proposal

Change of use from office to a 200-bedroom hotel with ground floor internal north/south public route (sui generis), ground floor museum (Class F1 (c)), flexible ground floor and roof level retail/restaurant/bar floorspace and public viewing terrace (Classes E & Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Class E) and new riverfront public realm.

The applicant

The applicant is **Cannon Capital Developments Ltd** and the architect is **Squire & Partners LLP**.

Strategic issues summary

Principle of development: Notwithstanding GLA officers support for the change of use of the office building to provide other strategic functions of the CAZ (namely hotel, cultural and retail uses) as well as the provision of public space, the proposal is not supported in strategic planning terms in view of the proposed restrictions to public access to the quayside and the absence of a final public access management plan as required by London Plan Policy D8 and Public London Charter LPG (paragraphs 19-30).

Transport: A public access management plan should be secured by planning condition or in a Section 106 agreement; and, improvements need to be made to ensure greater public use of the quayside, which is required in order to represent the fullest contribution to a high quality public realm, and therefore to fully justify the use of the TLRN for servicing, as opposed to servicing taking place within the site (paragraphs 33-36).

Sustainable development and Environment: Additional information relating to operational waste, recycling and waste reporting and end of life strategy is required for the circular economy and a commitment to post-completion reporting should be secured. The applicant should also explore additional greening measures to improve the scheme's UGF score (paragraphs 37-41).

Recommendation

That City Corporation be advised that the application does not currently comply with the London Plan for the reasons set out in paragraph 45. Where the associated concerns within this report are addressed, the application may comply with the London Plan.

Context

1. On 5 October 2020, the Mayor of London received documents from City Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under the following Category of the Schedule to the Order 2008:
 - **Category 3E (ix):** Proposes at least 2,500 sq.m. of non-residential floorspace class C1 hotels.
3. On 16 November 2020, the Mayor considered planning report GLA/2020/6584/S1([link to report here](#))¹ and subsequently advised City Corporation that the application did not comply with the former London Plan and the Intend to Publish London Plan for the reasons set out in paragraph 85 of the 16 November 2020 report; but where the associated concerns within this report are addressed, the application may comply with the former London Plan and then Intend to Publish London Plan.
4. On 25 August 2021, the Mayor received documents from City Corporation notifying him of amendments to the application, as described in this report. During the consultation period on the amendments the applicant has submitted an appeal for non-determination of the application and the Planning Inspectorate (PINS) informed City Corporation on 20 September 2021 of the start date for an Inquiry. The Corporation's planning report will be presented to the Committee on the 26 October 2021.
5. The purpose of this update report, which should be read in conjunction with the previously issued planning report GLA/2020/6584, is for the Mayor to consider the amendments made and provide the Corporation with an updated statement setting out whether he considers that the application as amended complies with the London Plan 2021, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
6. Once the City Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or, allow the Corporation to determine it itself. In this case, the Corporation need not refer the application back to the Mayor if it resolves to refuse permission.
7. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>.

Site description

8. The application site is on the north bank of the River Thames. It is bound by Lower Thames Street to the north, Water Lane to the east, Old Billingsgate Walk to the east and Thames Path to the south. The site contains the Grade I listed Custom House, a 19,698 sq.m. office building currently used by Her Majesty's Revenue and Customs (HMRC). The Grade II* listed River Wall, Stairs and Cranes also fall within the site's boundary. It is understood that HMRC vacated the premises early in 2021.

¹ <https://planning.london.gov.uk/pr/s/planning-application/a0i4J000002T6p2QAC/20206584?tabset-c2f3b=2>

9. Eastcheap Conservation Area, The Tower of London Conservation Area and Trinity Square Conservation Area are all in proximity of the site, as well as many listed buildings including the adjacent Grade II Old Billingsgate Market; Grade I Church of All Hallows by The Tower; Grade II* Watermen's Hall and the UNESCO World Heritage Site Tower of London with its numerous listed structures. A Scheduled Ancient Monument comprising the Roman and Medieval waterfronts is located below Old Billingsgate Market.
10. Lower Thames Street (A3211) forms part of the Transport for London Road Network (TLRN) and TfL is therefore the highway authority.
11. The site has a very high public transport access level (PTAL) of 6b. The site is within walking distance of Fenchurch Street, Aldgate East, Tower Hill, Tower Gateway, Bank, London Bridge and Cannon Street stations, giving access to a wide range of London Underground (LU), London Overground, National Rail, Docklands Light Railway (DLR) and TfL Rail services. The 78, 42, 100, 15, 48, 521, 21, 141, 17, 149, 43, 344, 30, 37, 133 and 35 bus services are also accessible at stops within walking distance.
12. Cycle Superhighway 3 runs along Lower Thames Street as a two-way segregated track, outside the site on the opposite side of the TLRN. The nearest Cycle Hire docking station is located approximately 200 metres west on Lower Thames Street.

Details of the proposal and amendments

13. The applicant, Cannon Capital Developments Ltd, proposes to refurbish the Grade I listed Custom House to provide:
 - a 200-bedroom hotel (Use Class C1)
 - museum;
 - 4 restaurants/bars (Use Class E);
 - spa and leisure facilities (Use Class E);
 - meeting rooms;
 - roof level public viewing terrace; and,
 - public realm along the river frontage.
14. On-site cycle parking, coach and taxi drop-off are also proposed. The refurbishment works proposed involves:
 - Removal of railings around existing riverside carpark compound;
 - demolition and re-building behind the retained facade of the 1960s East Block;
 - demolition of 1960s East Block roof and alteration of existing West roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms and plant space at their lower levels;
 - demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation);
 - alterations to and raising of the flood defence wall;
 - facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation);

- removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street, providing step free access;
 - associated works to the river wall;
 - hard and soft landscaping; and,
 - alterations to service ramp.
15. The key amendments to the scheme since the initial Stage I are: the reduction in the number of hotel bedrooms; inclusion of a museum (with a lift to provide access to the public viewing terrace); and retention of the height of the Centre block.

Updated strategic planning issues, policies and guidance

16. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the City of London Local Plan (2015) and the London Plan (2021).
17. The following are relevant material considerations:
- National Planning Policy Framework and National Planning Practice Guidance (2021);
 - National Design Code (2021)
 - Fire Safety D12(A) pre-consultation draft LPG;
 - Fire Safety D12(B) pre-consultation draft LPG;
 - Evacuation Lifts pre-consultation draft LPG;
 - Circular Economy Statements draft LPG;
 - Whole-life Carbon Assessments draft LPG;
 - Sustainable Transport, Walking and Cycling draft LPG;
 - Urban Greening draft LPG;
 - Be Seen' Energy Monitoring Guidance draft LPG; and,
 - Draft City Plan 2036.
18. The relevant issues and corresponding policies are as follows:
- | | |
|-----------------------------|--|
| • Central Activities Zone | <i>London Plan;</i> |
| • Hotel / tourism | <i>London Plan;</i> |
| • Culture | <i>London Plan; Mayor's Cultural Strategy;</i> |
| • Waterways | <i>London Plan;</i> |
| • Heritage and urban design | <i>London Plan; Character and Context SPG; Public London Charter LPG;</i> |
| • Equality | <i>London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;</i> |
| • Strategic views | <i>London Plan; London View Management Framework SPG;</i> |
| • Inclusive access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |

- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy; and,*
- Transport and parking *London Plan; the Mayor's Transport Strategy.*

Land use principles

Loss of office

19. As stated in the initial Stage I report, the proposal would result in the loss of 19,698 sq.m. of office space which will be replaced with a hotel-led scheme. This type of change of use is supported by London Plan Policy E1 and Policy SD5, subject to demonstrating that the prospect of providing office space (including affordable, low-cost, smaller units etc) has been explored and is not viable.
20. An independent review of the applicant's viability assessment (commissioned by the Corporation) has now been undertaken, which assessed the viability of the proposal as well as an alternative proposal for a museum recommended by the Corporation. It is understood that this recommendation is contained in a note issued by the Corporation to the applicant in January 2021 titled 'Uses, Public Access, Cultural Plan, Urban Design and the Public Realm', which outlined a number of requests that should be incorporated into the proposal. The recommendation sought the conversion of the entire ground floor and roof terrace of the West Block into a dedicated museum and associated flexible galleries/creative workspace.
21. On the viability of the application, the independent review concludes (using sensitivity analysis) that in favourable conditions a positive land value could be generated but there are downside risks. Regarding the Corporation's recommended scenario, the review concluded that the inclusion of this in the scheme would be unviable. As reported in the initial Stage I report, the application is supported by a viability statement (and an addendum) prepared by Savills, which considers six different office-led proposals (wholly office and office plus food and beverage/events space) in line with local policy requirements, to demonstrate that the building is not viable for long-term office use.
22. Given the findings of the independent review in relation to the viability of the Corporation's scenario and the fact that the uses being proposed (hotel, leisure, museum and retail) are strategic functions of the CAZ and would contribute to London's night-time and visitor economies in line with London Plan Policies E10, HC5 and HC6, the loss of office space is accepted. However, other aspects of the land use principles are not supported for reasons set out below.

Public access (internal and external)

23. In reinforcing the importance of publicly accessible space to engendering strong and inclusive communities in London, Objective GG1 of the London Plan lays out a number of measures that development proposals should consider. London Plan Policies D8, S114 and S116, the Mayor's River Thames Cultural Vision and Public London Charter LPG are all also relevant to the proposed public space.
24. Therefore, in the initial Stage I report, GLA officers made clear the importance of submitting a final curation and public access management plan that fully aligns with the principles and objectives espoused in the Mayor's The Case for a River Thames Cultural Vision and the then draft Public London Charter, now published.

25. As mentioned earlier in this report, the scheme has been amended to include a museum at ground floor; this is strongly supported. This publicly accessible 422 sq.m. space would operate Tuesdays to Sundays between 10:00 – 17:00. It is understood that the museum would celebrate the history of the building and a Heritage Partner would be selected to curate the museum. Details are to be secured through the Section 106 agreement.
26. Regarding other internal public spaces, a lift within the museum would provide access to the public viewing space on the western roof terrace. Free access between 10:00-1700 Tuesday to Sunday, with no mandatory spending, is proposed. Outside of these times, public access to these areas would require members of the public to patronise the rooftop restaurant / bar. Of concern is the shut off time for free public access to this viewing space given that it is confined to the day time; hence, preventing free access to experience night views of the Thames. This arrangement as proposed should be amended to provide free night access at some time during the week. At ground floor level, a north-south route through the building would be accessible to the public during 0900 – 2200 on any day when the hotel is operating for trading purposes. Guided tours of the Long Room and Robing Room are to be offered at least once a month; the Heritage Partner would also be granted exclusive use of the Long Room and/or the Robing Room for 24 timed slots per calendar year. However, this would be subject to the rooms’ availability and does not therefore provide enough certainty that the Heritage Partner would be able to make meaningful use of these spaces. An arrangement that provides more certainty for the Heritage Partner should be secured.
27. With respect to external public space, a key element of the proposal is the transformation of the car park into a 2,800 sq.m. public riverfront space as set out in the initial Stage I report. Seating, planting, widening of steps and ramps, drinking water fountains and the installation of temporary play elements for children are some of the proposed works for this public space. It is proposed that there would be free, unrestricted public access to this quayside space subject to restrictions for “private” events as indicated in the Table below.

Table 1: Maximum percentage of annual daylight hours

	Free Unrestricted Public Access	Private / Free or Purchase Ticket
	EXAMPLES: Food Fair, Christmas Market, Art Exhibition, Coffee Concession	EXAMPLES: Book Launch, School Performance, City Corporation / Mayor of London Function / London Fashion Week, Wedding Drinks, Open Air Show
Proportion of Public Area (Excl City Walkway)	Maximum % of Daylight Hours	Maximum % of Daylight Hours
51%-100%	Unlimited	5%
26%-50%	Unlimited	5%
0-25%	Unlimited	5%

Notes:

- Percentages are MAXIMUM limits
- Percentages are of annual daylight hours in each year (~4,500hrs)
- The limits apply to opening hours of events
- There will be a S106 Obligation to minimise the amount of space used by each event, acting reasonably
- There will be a S106 Obligation to minimise disruption and duration of setup and breakdown, acting reasonably
- Limits and definitions will be subject to annual review by the Curation Committee as defined in the Cultural and Community Strategy

28. Although not specific on timing, as proposed, the restrictions could lead to potential closures to the public for a substantial number of hours per annum as private events are likely to be concentrated in the summer months. This is compounded by the caveat that the daylight hours would only be counted when the event is open. Moreover, due to the fact that each day of the year has a different length of daylight hours, which varies from season to season, it is difficult to quantify the implications for closures of the Quay Side in numbers of days. More importantly, however, is the absence of a final public access management plan demonstrating how the restrictions would be implemented and mitigated for members of the public. Whilst it is envisaged that public access to the space would be restricted for up to 5% of annual daylight hours, no detailed rationale has been provided as to when closures are likely to occur in the year and for how long each closure is likely to last, for instance, in order to demonstrate how restrictions could be managed effectively to minimise disruption to the public. Without such a framework, managing the use of the Quayside in terms of daylight hours would be difficult to control and enforce.
29. Considering that unrestricted use is one of the guiding principles of the Public London Charter LPG for the development of new public spaces, the proposed restrictions are unacceptable in the absence of a final public access management plan as required by London Plan Policy D8 and the Mayor's Public London Charter LPG.

Conclusion on land use principles

30. Notwithstanding GLA officers support for the change of use of the office building to provide other strategic functions of the CAZ (namely hotel, museum and retail uses) as well as the provision of public space, the proposal is not supported in strategic planning terms in view of the proposed restrictions to public access to the quayside and the absence of a final public access management plan as required by London Plan Policy D8 and Public London Charter LPG.

Fire safety

31. An updated fire safety statement prepared by suitably qualified personnel at Norman Disney & Young has been submitted, as required by London Plan Policy D12. Means of warning and escape, access and facilities for fire personnel, fire safety management, types of materials to be used in the refurbishment and access for fire vehicles within the site's curtilage. However, it is proposed that the firefighting lifts be used as fire evacuation lifts. This is contrary to London Plan Policy D5, which requires, as a minimum, at least one suitably sized fire evacuation lift per core that is suitable to be used to evacuate people who require level access from the building. This matter should be addressed.

Inclusive access

32. Contrary to London Plan policy, only 5% of the bedrooms were proposed to be wheelchair accessible when the initial plans were submitted. The quantum of wheelchair accessible bedrooms has subsequently been increased to 10%, which complies with London Plan Policy E10. This is welcomed and compliance should be secured.

Transport

33. Development proposals are expected to safeguard and enhance the Thames Path as a walking route in accordance with London Plan Policies SI16 and T3.
34. Due to the scheme's sensitive and prominent location, the application should demonstrate an exemplar approach to the river frontage. As stated in the initial Stage I report, it will be essential to ensure convenient and pleasant step-free access to the riverside terrace from all sides of the site, increased urban greening, provide comfortable and welcoming street furniture for people to stop and rest, and high quality, durable surfacing such as York stone. This may require carriageway raising, kerb realignments and level changes. Public realm improvements are now also proposed along Old Billingsgate Walk, Water Lane and along the entire site frontage on Lower Thames Street. This is welcomed.
35. Further to the points raised earlier in this report, an access strategy for the riverfront should also be secured by planning condition or in a Section 106 agreement, and explicitly required to follow the Mayor's 'Public London Charter'. This is important as the riverfront terrace is proposed to remain as private land rather than being adopted as public highway. Permanent public access to the new public realm area adjacent to the river path should also be secured in perpetuity for both pedestrians and cyclists.
36. As addressed earlier in this report, improvements need to be made to ensure greater public use of the quayside. This is required in order to represent the fullest contribution to a high quality public realm, and therefore to fully justify the use of the TLRN for servicing, as opposed to servicing taking place within the site.

Sustainable development and Environment

Energy strategy

37. Many aspects of the applicant's energy strategy have been updated since the initial Stage I report in response to GLA officers' recommendations. Outstanding information related to waste water heat recovery, SAP 10 carbon factors, heat pumps, cooling demand, future-proofing, heat site network and Be Lean has been provided. Additionally, with respect to 'Be seen', the applicant has agreed to ensure that metering provisions will be incorporated in the detailed design; and the development will be designed to enable post construction monitoring and the information set out in the 'Be seen' guidance submitted to the GLA's portal at the appropriate reporting stages. This should be secured through the Section 106 agreement.

Circular economy

38. In accordance with Policy SI7 of the London Plan a circular economy statement has been submitted with the application, which is welcomed. However, additional information relating to operational waste, recycling and waste reporting and end of life strategy is required. A commitment to post-completion reporting, secured by planning condition, is also required. Full details of the outstanding issues associated with the circular economy strategy proposed have been sent directly to the applicant and the Corporation.

Urban greening

39. London Plan Policies G1 and G5 identify urban greening as a fundamental aspect of site and building design. As indicated in the initial Stage I report, additional measures should be explored to maximise the delivery of urban greening on the site to ensure the scheme records an Urban Greening Factor score as close as possible to the required 0.3.

Biodiversity

40. Policy G6 of the London Plan makes clear that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain, informed by the best available ecological information and addressed from the start of the development process. The proposal aims to enhance biodiversity on the site through the inclusion of various measures including a sedum roof and planting. These measures should be secured by condition in any planning approval.

Digital connectivity

41. In line with London Plan Policy SI6, the development should contribute to London's global competitiveness now and in the future in terms of the availability of sufficient digital infrastructure. As such, a planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The applicant should also consider the provision of free Wi-Fi within the public spaces.

Local planning authority's position

42. City Corporation planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting this month.

Legal considerations

43. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Corporation under Article 6 of the Order to refuse the application. In this case, the Corporation need not refer the application back to the Mayor if it resolves to refuse permission. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

44. There are no financial considerations at this stage.

Conclusion

45. London Plan policies on Central Activities Zone, visitor accommodation, offices, culture and night-time economy, equality, heritage, urban design, waterways, transport, sustainable development and environment are relevant to this application. The application does not comply with some of these policies, as summarised below:
- **Land use principles:** Notwithstanding GLA officers support for the change of use of the office building to provide other strategic functions of the CAZ (namely hotel, cultural and retail uses) as well as the provision of public space, the proposal is not supported in strategic planning terms in view of the proposed restrictions to public access to the quayside and the absence of a final public access management plan as required by London Plan Policy D8 and Public London Charter LPG.
 - **Transport:** A public access management plan should be secured by planning condition or in a Section 106 agreement; and improvements need to be made to ensure greater public use of the quayside, which is required in order to represent the fullest contribution to a high quality public realm, and therefore to fully justify the use of the TLRN for servicing, as opposed to servicing taking place within the site.
 - **Sustainable development and Environment:** Additional information relating to operational waste, recycling and waste reporting and end of life strategy is required for the circular economy statement and a commitment to post-completion reporting should be secured. The applicant should also explore additional greening measures to improve the scheme's UGF score.

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

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John Finlayson, Head of Development Management

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Lucinda Turner, Assistant Director Planning

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

From: [Robinson, Jessica](#)
To: [PLN - Comments](#)
Cc: [Devlia, Neel](#)
Subject: FW: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House
Date: 19 October 2021 15:35:09
Attachments: [image001.png](#)
[EA Reply NE 2020 132327 03.pdf](#)
[132327-04.pdf](#)

FYI

From: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>
Sent: 18 October 2021 15:35
To: Robinson, Jessica <Jessica.Robinson@cityoflondon.gov.uk>
Subject: RE: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House

THIS IS AN EXTERNAL EMAIL

Hi Jess,

Thank you again for consulting us on this application. I have spoken to our flood risk and asset performance teams about using the space in front of the flood defence for public/private events and they have confirm that this shouldn't be an issue. However could you please include the informative outlined below in any decision notice? Please note that this informative applies to both private as well as public events and general public access when the space is not being used for events.

Informative:

The events space will be located in front of the flood defences and we anticipate that the area would flood a number of times a year. If this space is to be used for events and for public access then the applicant would need to ensure that the area is not accessible to users/ the public when flooding is predicted. The applicant would also need to have a way of communicating this to event organisers and attendees. In addition, a Public Safety Risk Assessment should be undertaken so that the applicant can ensure that the proposed flood defence layout does not pose a danger to the general public or compromise access. No structures should be placed in this area (both temporary and permanent) and the applicant should be aware that a Flood Risk Activity Permit may be required for some of the events.

Finally we issue central London flood alerts, which covers Custom House. The existing security team are aware of the alerts and the need to close the existing gate if one is issued however it is essential that this is maintained in the future with the new flood defences in place.

I have also attached two previous letters we sent out which contain useful information and informatives which should be included in the decision notice. Please let me know if you have any questions.

Kind regards,

Demitry Lyons
Planning Advisor
Environment Agency | Hertfordshire and North London Sustainable Places Team

hnlustainableplaces@environment-agency.gov.uk
+442077140578
3rd Floor, Seacole Building, 2 Marsham Street, London, SW1P 4DF

From: Robinson, Jessica [<mailto:Jessica.Robinson@cityoflondon.gov.uk>]
Sent: 30 September 2021 11:48
To: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>
Subject: RE: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House

Hi Demitry,

Thank you for getting back to me.

An appeal for non-determination has been submitted to PINs, this will be the likely way a decision will be made on this application.

The City, however, are still taking a report of the application to our Planning and Transportation Committee for their consideration on the 26th October 2021, which will likely form our statement of case and later on our proofs.

Thanks,
Jess

From: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>

Sent: 30 September 2021 11:44

To: Robinson, Jessica <Jessica.Robinson@cityoflondon.gov.uk>

Subject: RE: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House

THIS IS AN EXTERNAL EMAIL

Good morning Jessica,

Thank you for your consultation. I will ask our flood risk team to take a look at this for you and provide comments.

I have noticed that an appeal has been logged for this application however your email indicates that the application is going to committee. Could you please confirm how this application is going to be decided?

Kind regards,

Demetry Lyons

Planning Advisor

Environment Agency | Hertfordshire and North London Sustainable Places Team

hnlustainableplaces@environment-agency.gov.uk

+442077140578

3rd Floor, Seacole Building, 2 Marsham Street, London, SW1P 4DF

From: Robinson, Jessica [<mailto:Jessica.Robinson@cityoflondon.gov.uk>]

Sent: 28 September 2021 12:33

To: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>

Subject: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House

Dear Kai,

I hope you are well.

I have taken over the above case from my colleague Sonia and just wanted to get in touch to clarify a couple of things before we take our report to committee.

We have recently received further information from the applicant regarding the Quayside area of public realm at the front of the building. Previously it was thought that the area of Quayside in front of the building would be open public space, however, it has now come to light that this space will be used for private events. We don't have much information on the types of events or the infrastructure that would be required(eg marquees, stages, seating areas).

I have included the applicants table of offerings below and attached a plan to show the quayside area.

I just wanted to check that the use of the quayside for private events would be acceptable in the flood plane or if it would be unacceptable in terms of public safety?

Sorry if this is not something te EA would comment on, I just wanted to check before we made a decision on this application. Feel free to give me a call if you want to discuss anything.

Maximum percentage of annual daylight hours

	Free Unrestricted Public Access	Private / Free or Purchase Ticket
	EXAMPLES: Food Fair, Christmas Market, Art Exhibition, Coffee Concession	EXAMPLES: Book Launch, School Performance, City Corporation / Mayor of London Function / London Fashion Week, Wedding Drinks, Open Air Show
Proportion of Public Area (Excl City Walkway)	Maximum % of Daylight Hours	Maximum % of Daylight Hours
51%-100%	Unlimited	5%
26%-50%	Unlimited	5%
0-25%	Unlimited	5%

Notes:

Percentages are MAXIMUM limits
 Percentages are of annual daylight hours in each year (~4,500hrs)
 The limits apply to opening hours of events
 There will be a S106 Obligation to minimise the amount of space used by each event, acting reasonably
 There will be a S106 Obligation to minimise disruption and duration of setup and breakdown, acting reasonably
 Limits and definitions will be subject to annual review by the Curation Committee as defined in the Cultural and Community Strategy

Jessica Robinson

Planning Officer
 Department of the Built Environment
 Tel: 07759364890

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Sonia Williams
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2020/132327/03-L01
Your ref: 20/00631/FULMAJ
Date: 20 January 2021

By email:
Sonia.Williams@cityoflondon.gov.uk

Dear Sonia

Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE.

Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & sui generis (drinking establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) Demolition and re-building behind the retained facade of the east block ii.) Demolition of east block roof and part demolition and alteration of existing west and centre block roof to erect 2 x two storey extensions above the east and west blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of centre block external stairs and replacement with new river terraces, stairs and step free ramped access across centre, and parts of west and east block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) Facade alterations and associated works to create a terrace at first floor level on the centre block (south elevation); vi.) Removal of railings on Lower Thames Street elevation and alterations to main centre block entrance on Lower Thames Street to accommodate access; vii.) Associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street. The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated.

Thank you for your consultation which we received by email on the 21st of December 2020. We have reviewed the additional information submitted for this application as detailed below:

- *Custom House 2170637 Flood Risk Assessment revision P3.*
- *Custom House 2170637 Flood Emergency Plan revision P1.*
- *Technical Note ref 2170637-EWP-TCN05 Custom House – Flood Zone Compensation revision P2.*

We are now in a position to **remove both parts of our previous objection** to this

Cont/d..

proposal.

Previous Objection Part 1 comments

The applicant has demonstrated that by lowering the land between the building and river frontage by 82mm, they are able to provide an overall flood storage net gain of just over 4m³, which addresses the first part of our objection.

Previous Objection Part 2 comments

The updated Custom House Flood Risk Assessment meets the requirement of the TE2100 Plan and we are also therefore able to remove the second part of our objection.

Additional information around the floodgate operational contingency plan has been provided. Whilst we have removed our objection we request that signage be installed advising people not to park on or obstruct the gateway.

Advisory comments

We would like to remind the riparian owner of their responsibility to ensure a fit for purpose flood defence line is maintained in line with s.6 of the Metropolis Management (Thames River Prevention of Flood) Act 1879 to 1962 (The Act). The asset inspector has noticed the shore element of the flood defence is below target condition. We strongly recommend the applicant addresses this issue within the scope of these works. Failure to maintain their flood defences, including the automated gate, could result in the agency taking enforcement action.

Informative

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you do not already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely

Mrs Eleri Randall

Planning Advisor

Direct dial 020 302 55516

Direct e-mail HNLsustainablePlaces@environment-agency.gov.uk

End

Sonia Williams
City of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2020/132327/04-L01
Your ref: 20/00631/FULMAJ
Date: 4 August 2021

Dear Sonia

Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE.

Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & sui generis (drinking establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) Demolition and re-building behind the retained facade of the east block ii.) Demolition of east block roof and part demolition and alteration of existing west and centre block roof to erect 2 x two storey extensions above the east and west blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of centre block external stairs and replacement with new river terraces, stairs and step free ramped access across centre, and parts of west and east block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) Facade alterations and associated works to create a terrace at first floor level on the centre block (south elevation); vi.) Removal of railings on Lower Thames Street elevation and alterations to main centre block entrance on Lower Thames Street to accommodate access; vii.) Associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street. The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated.

Thank you for consulting us on this revised application. We have reviewed the information submitted and have no objection to the proposals. There is no sleeping accommodation proposed in the basement which is for less vulnerable use only and the Changes to the ground floor are above the tidal breach level.

The applicant has demonstrated that by re-profiling the ground between the building and river frontage they are able to compensate for the 199m³ additional flood storage loss plus an additional 4m³.

Advisory comments

We would like to remind the riparian owner of their responsibility to ensure a fit for purpose flood defence line is maintained in line with s.6 of the Metropolis Management

(Thames River Prevention of Flood) Act 1879 to 1962 (The Act). The applicant should ensure no parking signage is installed to ensure vehicles do not obstruct the gate.

What is the Metropolis Management Act?

The Metropolis Management Act 1879 to 1962 is a series of acts passed to ensure the flood defences in London are maintained, in order to protect the city from flooding. They set out the responsibilities of Riparian Owners within the London Excluded Area. The acts place full responsibility on Riparian Owners for the renewal and maintenance of flood defences. They also grant the Environment Agency powers to inspect flood defences, instruct Riparian Owners to carry out works, or deliver works where the Riparian Owners do not, and then reclaim the cost.

The full acts can be accessed here:

<https://www.legislation.gov.uk/ukla/1879/198/contents/enacted>

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Yours sincerely

Mr Kai Mitchell
Sustainable Places Planning Specialist

Direct e-mail HNL SustainablePlaces@environment-agency.gov.uk

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ :OBJECTION
Date: 19 October 2021 15:55:46

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

I write to you with a sense of outrage on having read of the proposal to convert the Custom House into a luxury hotel.

I have lived and worked in London for most of my life, and have frequently walked alone, with friends and with groups of tourists past this historic building. The location and history of this building demand that it be treated with the respect due to it, and that it should be put into public use for all Londoners.

That this proposal, by offshore leaseholders with an interest above all in extracting yet more money from a property in central London can be considered, is a sad reflection on the state of our city.

In particular detail,

The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use'

The hotel development will destroy suites of Georgian offices that are a unique survival.

The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

I ask you to refuse planning consent to this dreadful application.

Sincerely

Alan Cooper
291b Upton Lane
Forest Gate
E79PR

From: [REDACTED]
To: [PLN - Comments](#); [REDACTED]
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ Objection
Date: 18 October 2021 04:28:55

THIS IS AN EXTERNAL EMAIL

Objection to **Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

Dear Sir

I object to the offshore company's designs for the Custom House - a building significant for London's heritage and Great Britain's heritage. Not only is it reprehensible and morally questionable at this time of increasing utility bills and taxes on the ordinary working and middle classes to allow a company based in a tax haven (which pays no tax to the U.K. and its sole purpose is to line their own pockets and not contribute to the U.K.) but to allow such vandalism on a historically important building.

I urge you to consider alternative proposals that consider the historical importance of the building and that will allow the U.K. public access to this great site. Soon, all of London will have been turned into soulless homogenous 'luxury hotels and flats' owned by non resident tax avoiding companies. It will be a ghost town of facades and glittering glass boxes.

Read the room - see how people craved to visit historic sites, parks and places of public interest during Covid.

Read the room - why is London allowing such desecration to historic buildings by companies who make no substantial tax contributions and who do not care about our heritage - they're not even based here.

Regards

**Alison Lynch
32 Field Heath Avenue
Uxbridge
UB8 3PD.**

Sent from my iPad

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION RE plans for Custom House London EC3R 6EE
Date: 20 October 2021 14:45:47

THIS IS AN EXTERNAL EMAIL

To the City of London planners

Planning Application references 20/00632/LBC and 20/00631/FULMAJ

Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE

Taking away publicly accessible and usable space from one of London's most important public buildings, internally and externally, is clearly not a public benefit in the City of London. The proposed lack of access harms the significance and threatens the future of this building as a heritage asset. The cultural status and location of this building on the River Thames and in the heart of London demands the best solution for the public.

I strongly object to the proposals.

Annabel Downs

2 Jerviston Gardens
London SW16 3EL

Ms Jessica Robinson
Department of the Built Environment
City of London Corporation
PO Box 270,
Guildhall,
London EC2P 2EJ

By email to: PLNComments@cityoflondon.gov.uk



Our reference: 21100

18th October 2021

Dear Ms Robinson,

Planning Application 20/00631/FULMAJ [Appeal Reference APP/K5030/W/21/3281630] & Listed Building Consent Application 20/00632/LBC [Appeal Reference APP/K5030/Y/21/3281258] - Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE.

SAVE Britain's Heritage has written on three previous occasions regarding the above planning and listed building applications on 26th October 2020, 22nd January 2021 and 13th August 2021. Following notification that the plans will be heard at the Planning and Transportation Committee on 26th October 2021, we wish to submit the following documentation outlining our detailed objection to the proposals in support of officer recommendation to refuse both applications.

I ask that these and our previous submissions be given careful consideration by members of the committee, and that SAVE is informed of any further decisions on consultations regarding these applications.

Yours sincerely,



Benedict Oakley
Conservation Officer



SAVE BRITAIN'S HERITAGE STATEMENT OF OBJECTION

A CULTURAL POWERHOUSE: THE CASE FOR PUBLIC ACCESS

Site Address: Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE.

LPA Refs: 20/00631/FULMAJ & 20/00632/LBC

PINS Appeal references: APP/K5030/W/21/3281630
APP/K5030/Y/21/3281258

Date: 7th October 2021

SUMMARY POINTS

- 1. Custom House is a Public Building with a long history of public access, equivalent to Somerset House**
- 2. Public access is critical to conserving its significance as a heritage asset**
- 3. Public access to the interior (including the Long Room) and to the Quayside Terrace is critical to securing the City Corporation's vision for regenerating the Riverside**
- 4. The current proposals do NOT provide adequate permanent unencumbered public access to the interior or to the Quayside Terrace**
- 5. The potential requirements of the hotel for private and exclusive events appear to take precedent over public access**
- 6. The lack of adequate public access is harmful to the significance of the building**
- 7. The proposals involve the loss of unique historic fabric in the West Wing**
- 8. The glazed roof pavilions harm the appearance of the building**
- 9. The public benefits offered by the applicant do NOT outweigh the harm caused by the proposals**
- 10. SAVE will make sure these concerns are raised at any public inquiry**

CUSTOM HOUSE QUAYSIDE



CUSTOM HOUSE LONG ROOM



SUMMARY

1. SAVE Britain's Heritage strongly supports the Planning Officer recommendation to refuse both the planning and listed building consent applications. SAVE agrees that the proposed alterations and extensions to the West and East wings cause harm to a designated heritage asset of the highest national significance. SAVE considers that this harm is NOT outweighed by adequate public benefits.
2. Most importantly, we consider that the proposals fail to provide the degree of public access which the significance of this historic public building justifies and demands. We consider that permanent public access to the quayside terrace and riverside path must be secured in perpetuity to meet the strategic policy visions of the City Corporation and the GLA. We consider that permanent public access must also be secured to important internal spaces within the ground and first floor of the Custom House in order to preserve the special significance of the heritage asset as a public building. The current situation presents a unique opportunity to re-open the building to the people of London.

BACKGROUND

3. SAVE has written on several occasions commenting on proposals to convert the Custom House into a hotel, most recently on 13th August 2021, objecting in detail to the latest plans. It supports the objections of the Georgian Group and others to the harmful impact caused by the loss of the rare surviving historic offices in the West Wing and the harmful impact on views of the building caused by the proposed glazed roof extensions to the East and West wings. However, the main thrust of SAVE's concerns rests with the issue of public access to the important historic public spaces within the building and the reinstatement of full and unencumbered public access to the quayside terrace facing the river.

SIGNIFICANCE OF THE CUSTOM HOUSE AS A HERITAGE ASSET AND A PUBLIC BUILDING

4. The Custom House is a grade I listed building. Its very high heritage significance is widely acknowledged, even though it remains comparatively little known to the general public because it has been largely closed to the public in recent decades. Its significance derives from all four criteria identified in Annex 2 of the National Planning Policy Framework (2021), those being archaeological, architectural, artistic and historic interest. These categories broadly accord with those set out previously in Historic England's Conservation Principles, namely evidential, historical, aesthetic and communal.
5. Much has been written about the architectural, archaeological and historic interest of Custom House and the site that the current building and its predecessors have occupied for many centuries. However, less has been said about its importance to the City, to London and to the whole country as a public building that has shaped the development of the nation for hundreds of years. As a venue for traders to gather and the interested public to meet, to conduct business and transactions with government officials, and to exchange news and information, it has played a huge part in the economic development of Britain, even greater than the Royal Exchange.
6. The Long Room at the heart of the building is one of the most magnificent spaces in London, and was at one time said to be the largest room in Europe. The illustrations and depictions by artists such as Rowlandson of the assembled throng within the Long Room demonstrate its importance as a meeting place and mixing pot for a wide cross-section of contemporary society. Much of the historic significance of this wonderful space lies in its public function, even though it has most recently been in desultory office use.
7. The space around the Custom House building is crucial to its setting. It is known that the quayside was originally unfenced and open to the public, to the extent that sentry boxes were installed to control crowd behaviour, and seating was put in by the Metropolitan Public Gardens Association in 1891, followed by tree planting by the Office of Works in 1903. After the Second World War the quayside terrace was commandeered by HMRC for car parking, and blue-painted railings were

erected in the 1990s to separate this from the riverside Thames Path. The railings detract from the setting of the building and from the appearance and function of the quayside terrace, but the removal of this redundant barrier should now be a straightforward matter.

8. With its very prominent position on the Thames, Custom House is comparable to Somerset House, which once housed its own great offices of state, although the immediate connection and proximity of Custom House to the river is now much greater following the separation of Somerset House from the river by the Victoria Embankment. Indeed, the powerful and dignified presence of Custom House and its spacious quayside terrace fronting the river are akin to County Hall, Tate Modern and the South Bank arts centre.
9. The historic function and public accessibility of Custom House makes a crucial contribution towards its heritage significance and should be a primary guide in deciding its reuse now that HMRC have vacated. The fact that public access was curtailed at various times during the 20th century, compounded by the security fencing to protect car parking from the newly-created riverside path, should not deflect from or dilute this purpose.
10. The same enlightened strategy that achieved the spectacular regeneration of Somerset House (once similarly blighted by car parking and governmental security) should be applied to Custom House so that it can once again be one of London's great public buildings, exploiting and maximising its riverside location. This will ensure that its significance as a heritage asset is preserved.

POLICY

11. The National Planning Policy Framework (NPPF), July 2021, states that, in determining applications, account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Annex 2 makes it clear that conservation is the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
12. There is a very strong and broad-based policy framework to require and support public access, cultural activity and public open space at Custom House, including the GLA's River Thames Cultural Vision and the City of London Plan 2015, the City Cluster Vision, Cultural Strategy 2018-2022 and Open Spaces Strategy. The draft City Plan 2036 shows Custom House and its quayside terrace as a key location for regeneration and new public open space.
13. Custom House occupies a key position between London Bridge and the Tower of London which will be crucial in achieving this vision. It is arguably a key site in the continuing evolution of the City. Together with the Cultural Mile along the northern edge of the City, the development of the City's riverside for similar cultural and community activities offers the potential for a 'ring of culture' to encircle and embrace the Square Mile, replacing what was once a ring of 1950s dual carriageways and then a 1990s 'ring of steel'.

ASSESSING THE PROPOSALS

14. NPPF (2021) Paragraph 199 states that great weight should be given to the asset's conservation, and that the more important the asset, the greater the weight should be, irrespective of whether any harm is substantial or less than substantial. Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

HARM CAUSED BY THE CURRENT PROPOSALS

15. SAVE agrees with the concerns raised by others over the harm caused by the loss of the historic and unique surviving offices in the West Wing, and by the damage to the skyline and various views of the

building, particularly from the south bank of the river, caused by the proposed construction of glazed roof extensions to the East and West wings.

16. SAVE's main concern is that the proposals will not provide the degree and perpetuity of public access that are necessary to preserve the significance of the heritage asset which derives so greatly from its historic public use. The effective privatisation of the vast majority of the interior, with only restricted public access to limited areas, will detract from the significance of the building.
17. SAVE agrees that the level of harm is less than substantial, but nevertheless is at the middle-to-upper end of that scale of harm for the reasons set out above.

ASSESSMENT OF PROPOSED PUBLIC BENEFITS

18. The applicant is offering various public benefits as part of its proposals. National Planning Policy Guidance (2014) states that public benefits can be economic, social or environmental and should be of a scale or nature to be of benefit to the public at large and should not just be of private benefit.
19. It is worth noting how the Charity Commission defines 'public benefits' (Guidance published September 2013). It states that there are two components of public benefit, the 'benefit aspect' and the 'public aspect'. The 'benefit aspect' is about whether the purpose is beneficial. As well as stating that the purpose must be beneficial it also states that any detriment or harm that results from the purpose must not outweigh the benefit.

Bringing the building back into use

20. The existing building is in good condition. No evidence has been provided to suggest otherwise, or that it is deteriorating. Indeed, extensive repairs were carried out in 1992, overseen by SKF Architects, involving large amounts of public money. The existing building is not on any register of Heritage at Risk, or immediately vulnerable.
21. While there are no other definitive proposals on the table, it is perfectly conceivable that there might be alternative schemes that would bring the existing building back into beneficial use. Given the considerable sale price of the site there can be no suggestion of any conservation deficit with proposals for reusing the building.

Improvements to historic fabric

22. The scheme includes various reinstatements of a few historic doorways and removal of recent intrusive services. However, these improvements are minor, and in terms of services, will be required in any event. They are far outweighed by the harm to existing historic fabric, particularly the loss of the historic offices in the West Wing and alterations to the original roof form.

Public Access

23. The applicant's introduction to its Cultural and Community Strategy (May 2021) states that '*Custom House and its associated quayside have historically been off limits to the public. Custom House has by its very nature been a secure and secretive building since it was first sited here*'. Nothing could be further from the truth. It displays an astonishing ignorance of the former history and function of one of Britain's most important public buildings.
24. The applicant's offer for public access must be considered within its historical context, not simply in comparison to its most recent past when public access to the building and quayside has been prevented.
25. The securing of public access to Custom House and its quayside in perpetuity should be regarded as a required reinstatement, rather than something completely novel. While the applicant's offer might

superficially appear attractive, the reality of the proposals is that public access within the building and outside will be considerably limited.

Access through the building

26. The proposed public through-route at ground floor level running north-south from Lower Thames Street to the Quayside terrace is a narrow pathway, and times of access may be restricted, subject to 'events' on the quayside. It is not clear what these might be, or what form of security will be adopted in the hotel foyer to vet anyone seeking to gain access. The public entrance is also the hotel entrance, where hotel clients and their bags will arrive and depart. A coach bay is proposed outside on Lower Thames Street. It is understood that the applicant has been requested by planning officers to make the dedicated public route more generous in width, but this has been declined because of the operational requirements of the hotel and its front-of-house. There is a risk that the general public may be deterred from trying to gain access on a casual basis.

A Museum

27. The Museum proposed is, in principle, a welcome component of the ground floor plan on the West Wing. However, it is not clear how permanent or independently funded and operated this might be. The proposed opening hours of the Museum are restricted to 10.00 – 16.00 on weekdays and 10.00 – 12 noon at weekends, which implies that the space is intended for other use outside those limited hours. This is particularly regrettable at the weekends when one might expect the greatest number of visitors to a museum.

Views from the roof pavilions

28. Free public access from the Museum to the roof top viewing area in the roof extension above the West Wing has the same restricted hours as the Museum. Outside those hours access is available only by booking a table in the restaurant. The proposed restaurant and bar in the new East Wing roof pavilion is only open to those who book, never open for casual visits.
29. In both cases these roof top extensions appear to be primarily restaurants with controlled access, rather than public viewing areas. They do not appear to be areas which the general public can access on a casual basis in the evenings or on weekend afternoons, as is the case for example at the top-floor café in Tate Modern. There are, of course, other places nearby, notably the Monument and Tower Bridge where the public can enjoy high level views of the river and the surroundings.

The Long Room

30. The proposed public access to the Long Room is highly restricted, limited to accompanied tours only, and with a total of 24 timed slots (each of 3 – 4 hours) per year. These times would be controlled by the hotel's Heritage Partner, and entirely at the discretion of the hotel operator. It is not at all clear how any booking system would be run, or whether hotel 'events' would take precedence.

External Public Access

31. It is unclear how all or parts of the quayside terrace might be closed off to the public for special events or private lettings run by the hotel, or how often this might occur. It is unclear how this might affect continuous access along the riverside path. The red line on the application drawings shows that the riverside path lies within the application site, and thus within the ownership of the applicant. The indication that events held on the terrace may be ticketed, or exclusively for hotel guests, implies that security fencing or barriers will be required. It is unclear how many days each year areas may be cordoned off '*where events are being set-up or taken down, or where secure management of events requires it and where maintenance and safety requires it*'. The policing and enforcement of this to maximise free public access could be fraught with difficulties and disputes.

32. It should be noted that the terrace between Old Billingsgate Market and the riverside path is completely open, with no fencing or barriers, or level changes. It effectively operates as a public open space, open at all times. An unencumbered riverside frontage and terrace at Custom House would facilitate the future mooring of historic ships or other floating accommodation and visitor attractions.

BALANCING HARM AGAINST PUBLIC BENEFITS

33. SAVE considers that public benefits proposed by the applicant are limited, ill-defined and potentially difficult to sustain. They do not come close to outweighing the very considerable harm caused to the significance of the heritage asset, both in terms of loss of historic fabric and the failure to reinstate in perpetuity the level of public access internally and externally that this important public building warrants.

ALTERNATIVE PROPOSALS

34. National Planning Policy Guidance (2014) provides advice on Optimum Viable Use: *'If there is a range of alternative viable uses (for a site), the optimum use is the one likely to cause the least harm to the significance of the heritage asset, not just through necessary changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use is not necessarily the most profitable one.'* It is important to consider whether any conflict between the provision of such public benefits and heritage conservation is necessary. Equivalent public benefits may be achievable with less or no harm by alternative design or uses.
35. While there are no detailed alternative schemes on the table, SAVE remains unconvinced that the current scheme is the only solution for the regeneration of Custom House.

CONCLUSION

36. Custom House is a heritage asset of the highest national importance, and derives much of its special significance from being a public building of long standing. As such it is an irreplaceable resource and must be conserved in a manner appropriate to its significance, so that it can be enjoyed for its contribution to the quality of life of existing and future generations. Public access is crucial to the conservation and enhancement of this unique heritage asset.
37. SAVE considers that the degree and sustainability of public access proposed is insufficient in the current plans, and that the extent of the public benefit claimed by the applicant is exaggerated, and not backed up by adequate legal and financial agreements. In SAVE's opinion the degree of harm caused by the proposals outweighs the public benefits from the scheme.

SAVE urges that the current proposals be rejected.

7th October 2021

Author

This statement has been written on behalf of SAVE Britain's Heritage by Alec Forshaw (MRTPI, IHBC). He worked as a town planning, urban designer and conservation officer with the London Borough of Islington from 1975 to 2007. He appeared as an expert witness for SAVE Britain's Heritage at the Public Inquiries on Smithfield Market and the Liverpool Welsh Streets in 2014 and the Anglia Square Norwich PLI in February 2020 and Albert Embankment in December 2020. He lectures, campaigns and acts as a trustee in a volunteer capacity for many heritage organisations, including the Victorian Society, the Twentieth Century Society, the London Historic Buildings Trust, the Churches Conservation Trust, and the Islington Building Preservation Trust.

He is the author of *The Markets of London* (1989), *Smithfield, Past and Present* (2016), *1970s London* (2012), and *New City: Contemporary Architecture in the City of London* (March 2013).

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection to the Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 09:43:37

THIS IS AN EXTERNAL EMAIL

Objection to the Planning Applications 20/00632/LBC and 20/00631/FULMAJ

As a Londoner I object to the destruction of our history by the planned gutting and transforming of Custom House to yet another "luxury" hotel.

It restored and used for cultural use, allowing public access as has been done with Somerset House

This is not in line with the meaningful guardianship owed to a Grade 1 listed building.

**Brendan and Caroline flick
45a Thurloe square
SW7 2SX
London**

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 22:04:55

THIS IS AN EXTERNAL EMAIL

Re: 20/00632/LBC and 20/00631/FULMAJ

I object to the proposal to turn the magnificent Custom House into a private hotel. It should remain a public asset, publicly accessible for use by the general public and not a playground for the wealthy.

Carolyn Clark
46 Chisenhale Road
London
E35QZ

Carolyn Clark
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 08:44:34

THIS IS AN EXTERNAL EMAIL

Dear city of London Corporation

I am writing to object to proposals to proposed redevelopment of Customs House a grade 1 building to another luxury hotel.

The proposals are harmful and cause unnecessary damage to the magnificent architecture. This is a greedy and shortsighted proposal and should be declined. Georgian buildings cannot be replaced and should not be desecrated for short term financial gain.

A luxury hotel is exclusive and is not for the general public or the culture of the city.

The unique building could and should be used as a public space for cultural activity. More thought should be given to protecting distinctive features. You should consult heritage experts who have no financial interest in damaging historic grade 1 buildings.

I ask that you completely reject the luxury hotel proposal.

Carolyn Clewer

12 BURHAN UDDIN HOUSE

COMMERCIAL STREET

E1 6BA

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION - Planning Application references 20/00632/LBC and 20/00631/FULMAJ.
Date: 21 October 2021 14:24:42

THIS IS AN EXTERNAL EMAIL

Hello

I am a resident of Tower Hamlets and regularly spend time at the river close to the location of the Custom House. I am writing to support the advice of your planning officers to object to the proposed development of the Custom House which you will be soon considering.

The Custom House is not just another building but a significant Grade-1 listed historical building in a prominent position in London. There is a long history of it having public access and within the City of London development plan, this site has specific uses specified. It has the potential not just to remain as a significant historic artefact but also to play a key role in the strategic redevelopment of the riverside in this part of London.

Decisions about a site such as this can't be taken lightly but the current proposed development is clearly problematic in a number of ways. For this reason I am objecting to the proposals on the following grounds and would ask you to refuse both the planning and listed building consents:

1. The proposed extensions and changes will cause permanent damage to a heritage asset of the highest national significance there are not any public benefits that outweigh this harm
2. These proposals will prevent the significant level of public access that a building of this nature, in this position, should be achieving. Access would ideally be both to the riverside and quayside in perpetuity and also to some of the key historic spaces in the interior.
3. There will be significant damage to the Georgian interior, in particular offices, which should be preserved for the nation and the views externally will be significantly damaged by the proposed extensions.

This site has the potential, like Somerset House further down the river to be a landmark destination for the public, residents of London and visitors to this beautiful city. Its situation is ideal, within a cultural quarter, to really add to the cultural and heritage experience of this area. However, this proposal will not achieve that. This current proposal will not only cause lasting damage but restrict the benefits its location would afford to members of the public and displays a huge lack of ambition for the potential uses of a site such as this.

I won't revisit the detailed responses that have been already put forward by organisations including Save Britain's Heritage but wanted to put on record that I don't believe this proposal does justice either to the ambitions for the site within various strategic plans nor the appropriate treatment of a grade 1 listed building of significant national importance.

Thanks and best wishes
Charlotte Wassermann
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection to planning application 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 21:06:07

THIS IS AN EXTERNAL EMAIL

Objection to planning application 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Sir or Madam,

Please record my strong objection to the proposed planning application for the old custom house,

This magnificent building should not be developed as proposed. Instead it should be kept in public ownership and developed along the lines of Somerset House, restoring it's unique character and maintaining maximum access to the public, including to the riverfront. London has more than enough luxury hotel accommodation and this fine building should not add to that wasteful use of a valuable public resource.

Please keep me informed of progress with this application including when and where it's future will be considered?

Thanks.

Chris Ashby

14 Bryantwood Road,
London N7 7BE

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 15:25:15

THIS IS AN EXTERNAL EMAIL

OBJECTION

I wish to record objections to Planning Applications 20/00632/LBC and 20/00631/FULMAJ re Custom House on the following grounds:

The planning application comprises an unsympathetic conversion to a luxury hotel that will be destructive to the fabric of the grade I listed building, erasing its meaning and significance. The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

In particular, suites of Georgian offices which are a unique survival will be destroyed and two light-box bars added to the roof, compromising the river frontage.

The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

There is an alternative arrangement: [SAVE Britain's Heritage](#) have prepared an imaginative alternative scheme which takes advantage of the building's spectacular location.

The Long Room should be returned as a space for Londoners and south-facing quayside opened for permanent public access with riverside cafes, restaurants and bars, like a square in Venice.

The obvious precedents of Somerset House and Tate Modern demonstrate how the Custom House could be put successfully to public use again.

Kind regards,

Claire Weiss

5 Lea Hall Road
London E10 7AR

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Custom House objection 20/00632/LBC and 20/00631/FULMAJ
Date: 19 October 2021 11:41:32

THIS IS AN EXTERNAL EMAIL

I wish to object to the redevelopment of the Custom House as a private hotel, and strongly object to any conversion of this grade 1 building. The Custom House should be for the benefit of the public, not exclusive residents of a luxury hotel.

Dame Sian Phillips DBE
52 Speed House
Barbican
London
EC2Y 8AT

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION: Planning applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 19:02:34

THIS IS AN EXTERNAL EMAIL

Alastair Moss
Chair of Planning & Transportation
The Department of the Built Environment
City of London
Guildhall
London
EC2P2EJ

Dear Mr Moss

I wish to register my concern about the proposed redevelopment of The Customs House to create a hotel.

While I appreciate that this is currently the common, and potentially successful fate of many a fine building (e.g. 10 Trinity Square, Bow Street Magistrates Court and The Old War Office), the situation, architecture and history of The Custom House make it far more deserving of preservation as a public space, with the building being restored and opened up as proposed, for example, by Save Britain's Heritage. This imaginative plan could enhance the area enormously in the same way that Somerset House and Tate Modern have enriched their environs, providing refuge, culture, education and recreation for both city workers and visitors.

I do hope that the City of London Corporation will favour Save Britain's Heritage proposal, and ensure that this distinguished and historically important riverside building is preserved for public use. The alternative, I understand, would include the loss of significant internal architecture, with unsympathetic external alterations and additions, likely creating an environment lacking in soul, as well as being inaccessible, of course, to all but the privileged few.

Yours sincerely

David Couper

Milford Cottage
Portsmouth Road
Milford
Surrey GU85HX
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Application 20/00632/LBC and Planning Application 20/00631
Date: 19 October 2021 15:20:57

THIS IS AN EXTERNAL EMAIL

Sir
OBJECTION
Planning Application 20/00632/LBC
And
Planning Application 20/00631/FULMAJ

As a concerned British citizen I wish to lodge objections to the two Planning Applications listed above on the following grounds:

- 1). The applications make clear the Developer's intentions to create two intrusive and highly visible light box pavilions on the building's roof. I contend that such an addition will destroy the integrity of the frontage which is, in its present state a unique and inspiring sight, a beautiful example of late Georgian and early Victorian public architecture:
- 2) the planned development also admits that its fulfilment will require the complete destruction of the suite of Georgian Offices for which the building is justly famous and which are generally considered to be not only the finest example of their kind in the world but possibly the only remaining complete one. Such a destruction would be an act of architectural vandalism:
- 3) finally, the proposed developments seem to be contrary to the stated objectives of City Plan 2036 particularly its concern that plans should be based on the principle of a "diverse cultural demographic " around "office-led cultural use". It's hard to envisage a development that could be less diverse and more exclusive for this heritage building than the current proposals to which I object.

I hope that these proposals will be refused for they will ruin a beautiful example of our cultural heritage. Instead The Custom House should be put to public use, in the ways exemplified by the development of Somerset House and The Tate Gallery of Modern Art, not only for Londoners but for all citizens of our country and of those lucky enough to visit here.

Name and Address of Objector
David Eade
5 Calgary Place
Leeds
LS7 4LQ

Sent from my iPad

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 17 October 2021 00:46:36

THIS IS AN EXTERNAL EMAIL

RE: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

To Whom It May Concern:

DISGRACEFUL!!!! Selling off of British History and Cultural Monuments to the highest bidder for short-term gain. PLEASE DO NOT AID AND ABET this cheapening and degradation of the London Cityscape already so deformed beyond recognition by characterless modern structures.

Please say NO to the conversion of the beautiful Customs House to a luxury hotel for use by a very limited and likely substantially overseas clientele. This beautiful structure should be preserved and converted to uses that taxpaying British citizens will be able enjoy and appreciate.

Thank you.

David Osborne
Claudia Parola
130 Swan Court Chelsea Manor Street
London SW3 5RU

Zdunik, Rafal

From: HNL Sustainable Places <[REDACTED]>
Sent: 18 October 2021 16:30
To: PLN - Comments
Subject: RE: Appeal Notification 20/00631/FULMAJ
Attachments: EA Reply NE 2020 132327 03.pdf; 132327-04.pdf; RE: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House

THIS IS AN EXTERNAL EMAIL

Dear Planning Administration team,

Thank you for informing letting us know that this application has gone to appeal and for allowing us to make further comments. Originally we had an objection to this planning application however this objection has since been resolved. However we have provided yourselves and the applicant with a number of informatives which should be included in the decision notice and I have attached these for information. I have also provided a brief summary below:

- Letter dated 20 January 2021: Confirms that our previous objections have been resolved and includes a number of informatives.
- Letter dated 4 August 2021: confirms we have no objections to revisions made to the plans.
- Email to Jessica regarding the use of space on the river side of the new flood defences for events and additional informative.

Please contact me should your team have any further questions.

Kind regards,

Demistry Lyons
Planning Advisor
Environment Agency | Hertfordshire and North London Sustainable Places Team

[REDACTED]
3rd Floor, Seacole Building, 2 Marsham Street, London, SW1P 4DF

-----Original Message-----

From: PLNComments@cityoflondon.gov.uk [mailto:PLNComments@cityoflondon.gov.uk]
Sent: 27 September 2021 14:41
To: HNL Sustainable Places <[REDACTED]>
Subject: Appeal Notification 20/00631/FULMAJ

Dear Sir/Madam

Please see attached notification of appeal for Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE .

Kind Regards

Planning Administration

On behalf of

Sonia Williams
Department of the Built Environment
City of London

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Sonia Williams
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2020/132327/03-L01
Your ref: 20/00631/FULMAJ
Date: 20 January 2021

By email:

Dear Sonia

Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE.

Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & sui generis (drinking establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) Demolition and re-building behind the retained facade of the east block ii.) Demolition of east block roof and part demolition and alteration of existing west and centre block roof to erect 2 x two storey extensions above the east and west blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of centre block external stairs and replacement with new river terraces, stairs and step free ramped access across centre, and parts of west and east block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) Facade alterations and associated works to create a terrace at first floor level on the centre block (south elevation); vi.) Removal of railings on Lower Thames Street elevation and alterations to main centre block entrance on Lower Thames Street to accommodate access; vii.) Associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street. The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated.

Thank you for your consultation which we received by email on the 21st of December 2020. We have reviewed the additional information submitted for this application as detailed below:

- *Custom House 2170637 Flood Risk Assessment revision P3.*
- *Custom House 2170637 Flood Emergency Plan revision P1.*
- *Technical Note ref 2170637-EWP-TCN05 Custom House – Flood Zone Compensation revision P2.*

We are now in a position to **remove both parts of our previous objection** to this

Cont/d..

proposal.

Previous Objection Part 1 comments

The applicant has demonstrated that by lowering the land between the building and river frontage by 82mm, they are able to provide an overall flood storage net gain of just over 4m³, which addresses the first part of our objection.

Previous Objection Part 2 comments

The updated Custom House Flood Risk Assessment meets the requirement of the TE2100 Plan and we are also therefore able to remove the second part of our objection.

Additional information around the floodgate operational contingency plan has been provided. Whilst we have removed our objection we request that signage be installed advising people not to park on or obstruct the gateway.

Advisory comments

We would like to remind the riparian owner of their responsibility to ensure a fit for purpose flood defence line is maintained in line with s.6 of the Metropolis Management (Thames River Prevention of Flood) Act 1879 to 1962 (The Act). The asset inspector has noticed the shore element of the flood defence is below target condition. We strongly recommend the applicant addresses this issue within the scope of these works. Failure to maintain their flood defences, including the automated gate, could result in the agency taking enforcement action.

Informative

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you do not already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely

Mrs Eleri Randall

Planning Advisor

Direct dial 020 302 55516

Direct e-mail HNLsustainablePlaces@environment-agency.gov.uk

End

Sonia Williams
City of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2020/132327/04-L01
Your ref: 20/00631/FULMAJ
Date: 4 August 2021

Dear Sonia

Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE.

Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & sui generis (drinking establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) Demolition and re-building behind the retained facade of the east block ii.) Demolition of east block roof and part demolition and alteration of existing west and centre block roof to erect 2 x two storey extensions above the east and west blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii) demolition of centre block external stairs and replacement with new river terraces, stairs and step free ramped access across centre, and parts of west and east block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) Facade alterations and associated works to create a terrace at first floor level on the centre block (south elevation); vi.) Removal of railings on Lower Thames Street elevation and alterations to main centre block entrance on Lower Thames Street to accommodate access; vii.) Associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street. The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated.

Thank you for consulting us on this revised application. We have reviewed the information submitted and have no objection to the proposals. There is no sleeping accommodation proposed in the basement which is for less vulnerable use only and the Changes to the ground floor are above the tidal breach level.

The applicant has demonstrated that by re-profiling the ground between the building and river frontage they are able to compensate for the 199m³ additional flood storage loss plus an additional 4m³.

Advisory comments

We would like to remind the riparian owner of their responsibility to ensure a fit for purpose flood defence line is maintained in line with s.6 of the Metropolis Management

(Thames River Prevention of Flood) Act 1879 to 1962 (The Act). The applicant should ensure no parking signage is installed to ensure vehicles do not obstruct the gate.

What is the Metropolis Management Act?

The Metropolis Management Act 1879 to 1962 is a series of acts passed to ensure the flood defences in London are maintained, in order to protect the city from flooding. They set out the responsibilities of Riparian Owners within the London Excluded Area. The acts place full responsibility on Riparian Owners for the renewal and maintenance of flood defences. They also grant the Environment Agency powers to inspect flood defences, instruct Riparian Owners to carry out works, or deliver works where the Riparian Owners do not, and then reclaim the cost.

The full acts can be accessed here:

<https://www.legislation.gov.uk/ukla/1879/198/contents/enacted>

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Yours sincerely

Mr Kai Mitchell
Sustainable Places Planning Specialist

Direct e-mail HNL SustainablePlaces@environment-agency.gov.uk

From: [REDACTED]
To: [REDACTED]
Subject: RE: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House
Attachments: [image001.png](#)
[EA Reply NE 2020 132327 03.pdf](#)
[132327-04.pdf](#)

Hi Jess,

Thank you again for consulting us on this application. I have spoken to our flood risk and asset performance teams about using the space in front of the flood defence for public/private events and they have confirm that this shouldn't be an issue. However could you please include the informative outlined below in any decision notice? Please note that this informative applies to both private as well as public events and general public access when the space is not being used for events.

Informative:

The events space will be located in front of the flood defences and we anticipate that the area would flood a number of times a year. If this space is to be used for events and for public access then the applicant would need to ensure that the area is not accessible to users/ the public when flooding is predicted. The applicant would also need to have a way of communicating this to event organisers and attendees. In addition, a Public Safety Risk Assessment should be undertaken so that the applicant can ensure that the proposed flood defence layout does not pose a danger to the general public or compromise access. No structures should be placed in this area (both temporary and permanent) and the applicant should be aware that a Flood Risk Activity Permit may be required for some of the events.

Finally we issue central London flood alerts, which covers Custom House. The existing security team are aware of the alerts and the need to close the existing gate if one is issued however it is essential that this is maintained in the future with the new flood defences in place.

I have also attached two previous letters we sent out which contain useful information and informatives which should be included in the decision notice. Please let me know if you have any questions.

Kind regards,

Demity Lyons
Planning Advisor
Environment Agency | Hertfordshire and North London Sustainable Places Team

[REDACTED]
3rd Floor, Seacole Building, 2 Marsham Street, London, SW1P 4DF

From: Robinson, Jessica [REDACTED]
Sent: 30 September 2021 11:48
To: HNL Sustainable Places [REDACTED]
Subject: RE: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House

Hi Demity,

Thank you for getting back to me.

An appeal for non-determination has been submitted to PINs, this will be the likely way a decision will be made on this application.

The City, however, are still taking a report of the application to our Planning and Transportation Committee for their consideration on the 26th October 2021, which will likely form our statement of case and later on our proofs.

Thanks,
Jess

From: HNL Sustainable Places [REDACTED]
Sent: 30 September 2021 11:44
To: Robinson, Jessica [REDACTED]
Subject: RE: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House

THIS IS AN EXTERNAL EMAIL

Good morning Jessica,

Thank you for your consultation. I will ask our flood risk team to take a look at this for you and provide comments.

I have noticed that an appeal has been logged for this application however your email indicates that the application is going to

committee. Could you please confirm how this application is going to be decided?

Kind regards,

Demetry Lyons
Planning Advisor
Environment Agency | Hertfordshire and North London Sustainable Places Team

[Redacted]
3rd Floor, Seacole Building, 2 Marsham Street, London, SW1P 4DF

From: Robinson, Jessica [Redacted]
Sent: 28 September 2021 12:33
To: HNL Sustainable Places [Redacted]
Subject: NE/2020/132327/04-L01 - 20/00631/FULMAJ Custom House

Dear Kai,

I hope you are well.

I have taken over the above case from my colleague Sonia and just wanted to get in touch to clarify a couple of things before we take our report to committee.

We have recently received further information from the applicant regarding the Quayside area of public realm at the front of the building. Previously it was thought that the area of Quayside in front of the building would be open public space, however, it has now come to light that this space will be used for private events. We don't have much information on the types of events or the infrastructure that would be required(eg marquees, stages, seating areas).

I have included the applicants table of offerings below and attached a plan to show the quayside area.

I just wanted to check that the use of the quayside for private events would be acceptable in the flood plane or if it would be unacceptable in terms of public safety?

Sorry if this is not something te EA would comment on, I just wanted to check before we made a decision on this application. Feel free to give me a call if you want to discuss anything.

Maximum percentage of annual daylight hours

	Free Unrestricted Public Access	Private / Free or Purchase Ticket
	EXAMPLES: Food Fair, Christmas Market, Art Exhibition, Coffee Concession	EXAMPLES: Book Launch, School Performance, City Corporation / Mayor of London Function / London Fashion Week, Wedding Drinks, Open Air Show
Proportion of Public Area (Excl City Walkway)	Maximum % of Daylight Hours	Maximum % of Daylight Hours
51%-100%	Unlimited	5%
26%-50%	Unlimited	5%
0-25%	Unlimited	5%

Notes: Percentages are MAXIMUM limits
Percentages are of annual daylight hours in each year (~4,500hrs)
The limits apply to opening hours of events
There will be a S106 Obligation to minimise the amount of space used by each event, acting reasonably
There will be a S106 Obligation to minimise disruption and duration of setup and breakdown, acting reasonably
Limits and definitions will be subject to annual review by the Curation Committee as defined in the Cultural and Community Strategy

Jessica Robinson
Planning Officer
Department of the Built Environment
Tel: [Redacted]

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R C Mathews
83 Earls Hall Ave
Southend on Sea
Essex SS2 6NT

[REDACTED]
[REDACTED]
19 October 2021

The Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
London,
EC2P 2EJ

OBJECTION

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Hello

I write to object to the above applications to turn the historic London Custom House into a hotel.

I joined the staff of HM Customs and Excise (the predecessor of HMRC) in 1969 and spent several years working in this building, in the largely unaltered rooms on the upper floors of the west end of the building (that wing that was not bombed and then rebuilt after WW2.)

The central and western parts of the original building, now nearly 200 years old, are a unique survivor of late Georgian London and the building is surely an icon of the City of London's maritime and trading heritage. The building (and its predecessors) housed the Collector and his staff for the most important and prestigious division of the Customs service – The Port of London. He controlled all of the Officers who were such a presence at all of the docks and quays along the river, together with those working at a network of bonded warehouses and other commercial establishments throughout the city. The Custom House was at the centre of a vast web of revenue control.

What should be the fate of a building that is no longer needed for its original function is unclear. But this is not it. The destruction of such a structure (for the planned conversion is in reality exactly that) would be a tragedy that future London citizens would in due time deplore. As Joni Mitchell's song so aptly expresses it – 'You don't know what you've got 'til it's gone'.

Please don't let that happen.

Yours sincerely

From: [REDACTED]
To: [PLN - Comments](#)
Subject: OBJECTION - Re Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 11:59:25

THIS IS AN EXTERNAL EMAIL

Dear City of London Corporation,

As previous residents of London and as members of the public who appreciate the city and its history, we are writing to express our objection to the proposed redevelopment of the Customs House.

We need to think more creatively about the use of this building, in such a way that it will keep it within the access of the general public and not for the exclusive use of patrons at a luxury hotel.

We also need to look at the building, both externally and internally, as an architectural whole, not merely as a decorative facade with a gutted interior and light box pavilions bars on the roof.

We ask you please to turn down this planning application and allow for a more public development of the building.

(Please see: https://mcusercontent.com/9ea03bb11e3ccc82634488e2b/files/89340061-ef7a-407b-bf18-01a31aab800/2003_SAVE_CUSTOM_HOUSE_6_.pdf)

Thank you.

Sincerely,

Dr C Ashley and Ms E Walker
NR1 3RD

THE CUSTOM HOUSE

Page 58

The London Custom House is a forgotten treasure, on a prime site on the Thames with glorious views of the river and Tower Bridge.

The question now before the City Corporation is whether it should become a luxury hotel with limited public access or whether it should have a more public use, especially the magnificent 180 foot Long Room.

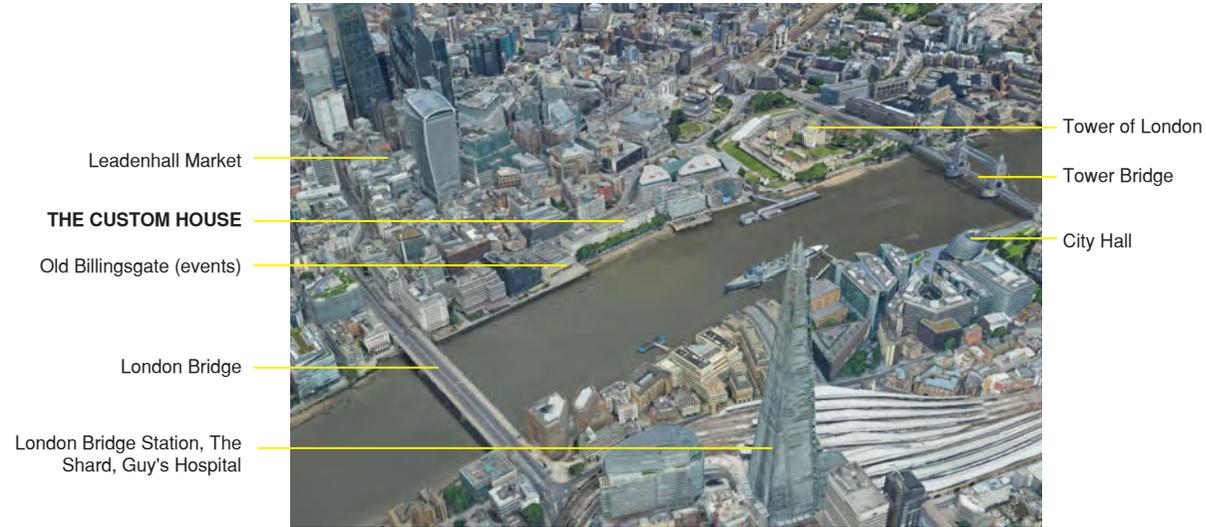
The Custom House is zoned for office use and permission for a hotel requires a change of use which the City may be hesitant to give. Circumstances have changed since the Custom House was sold as part of a £370 million job lot of HMRC properties around the UK to an offshore company in Bermuda – a sale that caused considerable merriment among HM customs staff in view of the tax avoidance issues it raised.

SAVE Britain's Heritage has therefore worked with the architect John Burrell to show how this monumental public building, once thronged with people, can have a more public use again. SAVE invites public debate on the future of the Custom House.



Re-connecting The City to the River Thames

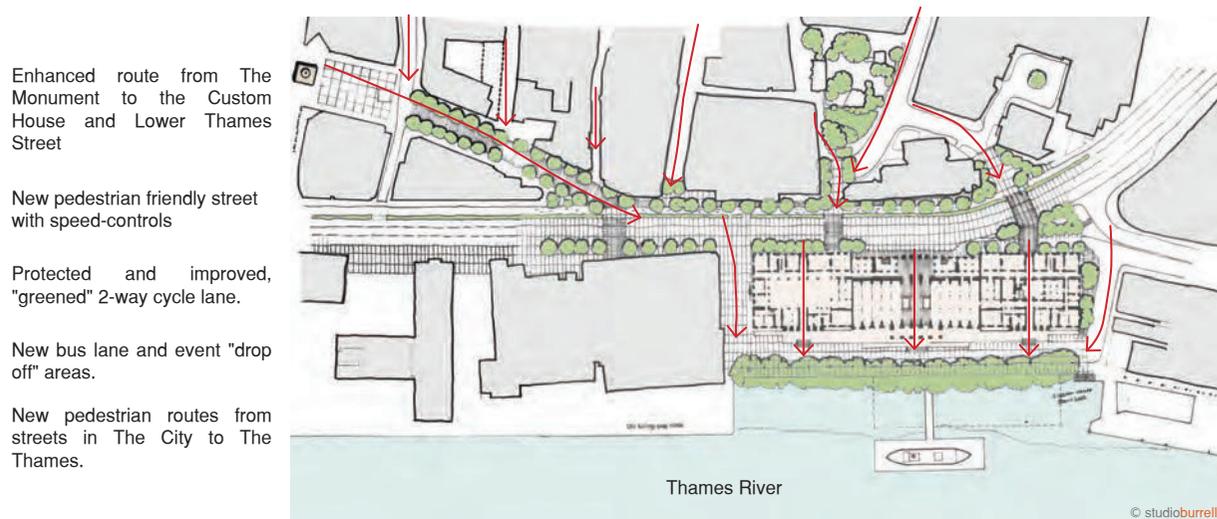
The Custom House is less than 200 metres from Leadenhall Market and the Lloyds Building and the Gherkin just beyond where high-rise buildings crowd out the sky. Who among the tens of thousands of City workers emerging from their offices in search of air and light make the short journey to the river? For decades it has been made virtually impossible by the traffic fumed canyon that is Lower Thames Street. Yet recently for several weeks we have seen a London free of traffic where people can move on foot or bike without being overwhelmed by noxious fumes.



In previous times many streets and passageways led from the then narrow Lower Thames Street to the working active quayside of the Thames and the Pool of London.

A new public place in London

The architect John Burrell has worked with SAVE on visionary schemes for Smithfield General Market and the south side of the Aldwych around St Mary le Strand to create new public space. There is already a bike route opposite the Custom House along the north side of Lower Thames Street. By extending the narrow pavements a much better pedestrian route can be created linking with the Tower of London and the lovely Wren church of St. Magnus the Martyr below London Bridge.

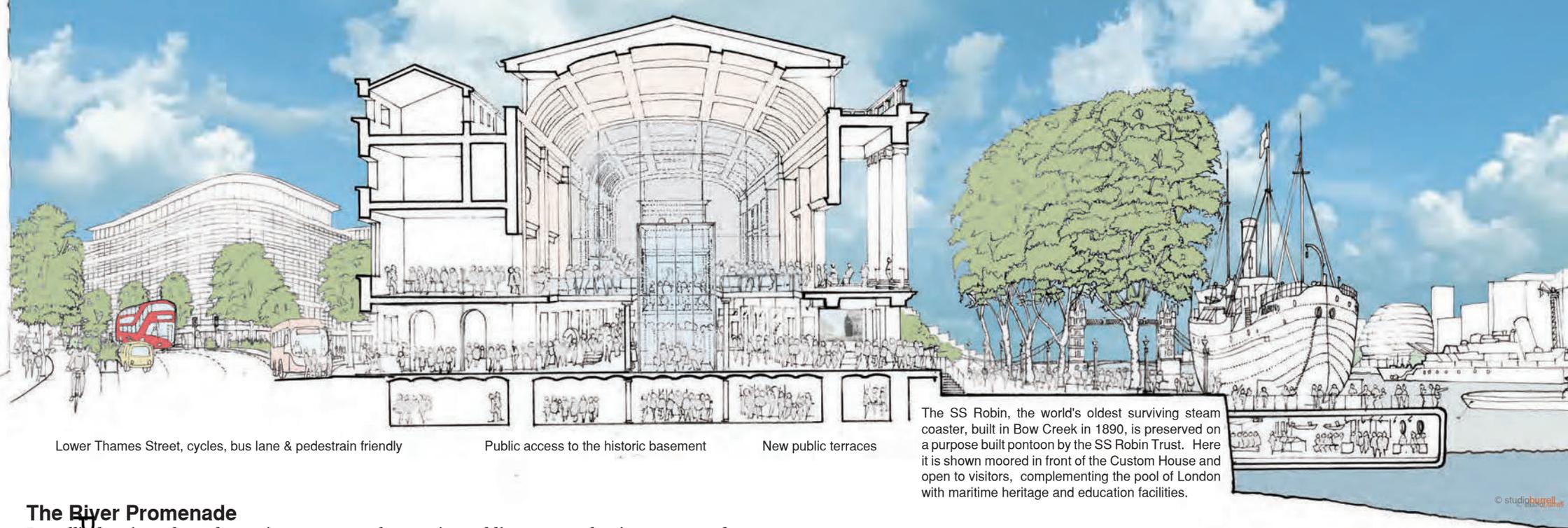


The Long Room

The great feature of the Custom House is the Long Room, 180 foot long, looking out over the river and rising through three stories, larger than any of the famous Livery Halls and currently in desultory use for offices.

Open this magnificent interior to new varying uses

Burrell proposes opening up the original central public entrance to the Custom House and creating a new access through the building to the river terrace. To make this more prominent, inviting new paved surfaces will be introduced to signify pedestrian priority across Lower Thames Street.



The River Promenade

Burrell's drawings show alternative treatments for creating public access to the river promenade.

The ground level on the riverside of the Custom House is 1.5 metres below Lower Thames Street, allowing the creation of a raised terrace (also aiding flood protection), for the ground floor rooms and below, a broad public promenade with trees, seats, kiosks and cafes for the public. The present 'go away' railings can be removed, and the river brought into immediate view. The existing lamp standards can be retained. Further possibilities are to extend the terrace with a pontoon floating on the river and a ramped access to the museum ship SS Robin which is part of the UK's National Historic Fleet and would be a major attraction in this location. Just as Napoleon described St Mark's Square in Venice as the most beautiful salon in Europe so the present desultory Custom House car park can become the loveliest terrace in London, equalling, even surpassing, the great river terrace at Somerset House as it is on the river without traffic in front.

The hidden levels of history

The King's Warehouse is a large multi columned lower hall (now obscured by partitions) opening onto the river terrace.

Looking at options

Inspired by the magical restoration of St Pancras Station, Burrell proposes a cut in the floor of the Long Room rather like the voids opened at St Pancras to allow stairs and lifts to ascend from ground to platform level. These lifts are shown as glass lifts reducing their visual impact. They could be reduced in size if their impact is considered too great. Equally important they could be extended into the basement opening up a whole largely disused level for multiple uses that do not require daylight. The great length of the Long Room may restrict the numbers of hirings to very large events and exhibitions. Therefore, John Burrell proposes an alternative, introducing clear glass screens rising to the ceiling. These would divide the Long Room into a central hallway looking out through to the riverfront and separate grand saloons on either side. These could be used for separate events or a single large event.

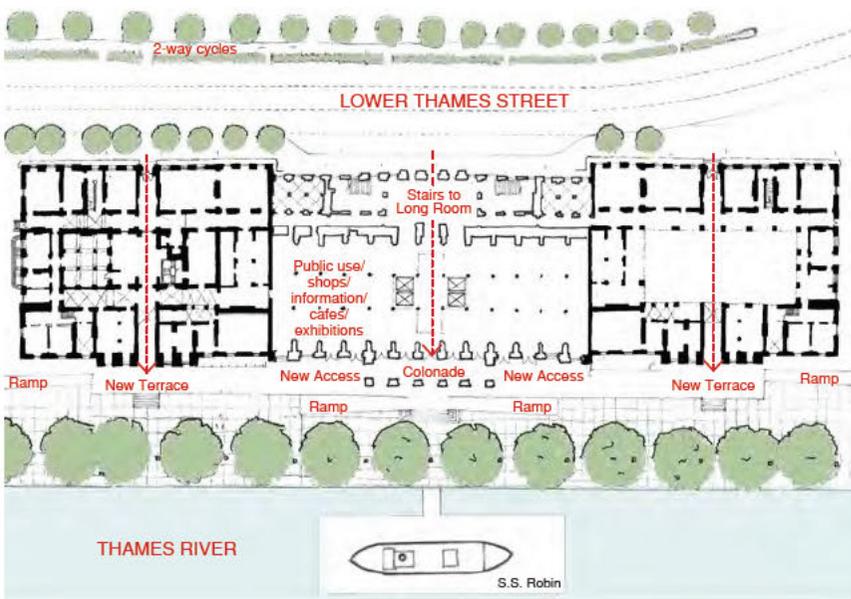
Options for event combinations:

- completely separate events organised by different hosts – say a lecture in one half and a dinner in the other
- a single host wanting a launch and a presentation in one saloon and a dinner in the other
- an art exhibition or auction in one or both saloons.

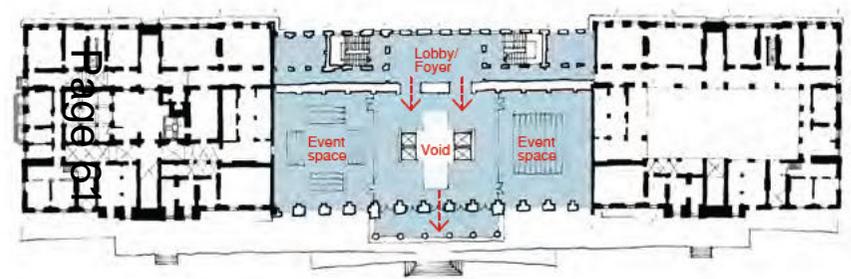
Coincidentally these saloons have similar dimensions to the Wigmore Concert Hall near Oxford Street which has London's finest acoustic.



The Long Room could be made fully accessible with lifts to create two new linked performance/event spaces with access to the external terrace under the portico.



Ground Floor - Quay Side Level



First Floor - Long Room Level © studiosburrell

The Office Hub - a new way of working suited to the times

The City Corporation maybe reluctant to change the present office use classification to hotel. A second alternative is to turn the Custom House into a workspace hub with a mix of lettable office and studio spaces. The east end of the Custom House was rebuilt as modern office space after World War II bombing and can be reconfigured as open plan or cellular offices.

The Western third of the Custom House retains its original layout of larger and smaller offices for customs officers and clerks of varying rank. In the Covid era these provide a degree of containment which would suit many office users. High ceilings, airy corridors and large sash windows also provide excellent ventilation with fresh air.



SAVE sets out alternative strategies - a sparkling mix of uses

An adventurous transformation - forgotten splendour transformed for public use.

The Art Gallery

Around the world collectors are looking for large and unusual spaces to display their art treasures, both historic and modern. Examples of new Galleries in historic buildings are legion – **the Saatchi Gallery** in Chelsea Barracks, **the Boros Gallery (a)** of contemporary art in a World War II bunker in Berlin; **the Ullens Centre for Contemporary Art** in a 1950s state owned former munitions factory in Beijing (**798 Art District**).

An inspiring parallel is to be found in the **Hauser & Wirth Gallery** in Zurich (**(b)**), installed in the former Lowenbrau Brewery, a building of similar dimensions to the London Custom House. Long, tall spaces are well suited to gallery use, e.g. Liverpool’s purpose designed **Lady Lever Gallery (c)** and the repurposed **Les Abattoirs Museum of Modern and Contemporary Art** in Toulouse (**(d)**).

SAVE argues that arts and gallery use can transform the City of London’s arts offer. A large-scale art gallery can be available to both artists and collectors and to commercial art galleries. Christie’s and Sotheby’s could hold previews of sales in the Long Room.

This is not just a pipe dream. By exhibiting in the City, salerooms and galleries would be bringing the art to the highest concentration of potential buyers in the world. Every financial institution in the Square Mile would be in walking distance of the Custom House. With its magnificent riverside position and river terrace the Custom House can be a “must visit” arts venue nearly every week of the year.

There are also opportunities for outdoor exhibitions of sculpture like the brilliantly successful giant horse’s head (Still Water) by Nic Fiddian-Green at Marble Arch which has become a destination in itself.



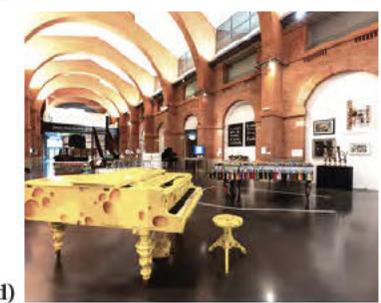
(a)



(b)



(c)



(d)

E L I Z A B E T H H I L L I A R D

30 Braithwaite House Bunhill Row London EC1Y 8NE.

telephone: + [REDACTED]

To: The Department of the Built Environment

Sent by email to: PLNComments@cityoflondon.gov.uk

Copied to: Alastair Moss, Chair of Planning & Transportation Committee

([REDACTED])

On: Sunday 17th October 2021

OBJECTION

Dear Madam,

I write to you re Planning Applications 20/00632/LBC and 20/00631/FULMAJ concerning development of the Custom House in the City of London.

I am a Freeman of the City of London and a local resident living in EC1. I often walk along the river and pass the City's old Custom House, a national and heritage asset, and I **object in the strongest possible terms** to these planning applications which will **vandalise** the fine interiors of this historic building, and will **take it out of public use**, for financial gain to commercial developers and hoteliers, when there is not only clear and outstanding precedent for it to remain in public use (vide Somerset House and Tate Modern), but also an imaginative alternative scheme available for its development by SAVE Britain's Heritage.

The proposed conversion of this architectural gem with unique City history is unsympathetic in the extreme. Its conversion to a luxury hotel would be destructive to the fabric of this Grade 1 listed building, erasing its meaning and significance. In particular, suites of Georgian offices which are a unique survival will be destroyed and two light-box bars added to the roof, compromising the roofscape and the river frontage. The only benefit of the proposed conversion would be to the offshore property developer based in the Bermuda tax haven which leases the building.

The alternative SAVE Britain's Heritage scheme is sympathetic to the interior and makes the most of the Custom House's spectacular riverside location, returning the magnificent Long Room as a space for Londoners and creating a south-facing quayside open to permanent public access with riverside cafés, restaurants and bars, like a piazza in Venice.

The City of London has a rich history as one of the world's great trading ports, of which the Custom House is not only a symbol but a unique physical legacy. To grant these planning applications would be to squander one of the City's and Great Britain's historic assets, throwing it to greedy commercial interests who clearly (from the details of this application) are hostile to the architectural entity which is the Custom House and its history. I urge you to resist their siren call and reject these applications, instead returning the building to public use with a sympathetic engagement with its outstanding history and architecture, and its stunning location, to the benefit of Londoners, the City and the country.

I am yours faithfully
Elizabeth Hilliard.

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Objection
Date: 20 October 2021 00:36:15

THIS IS AN EXTERNAL EMAIL

To the City of London Corporation

OBJECTION

To Planning Applications 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel. I strongly object, believing it should be put back to public use for all Londoners and visitors.

The proposal is undoubtedly a contradiction in the City of London's policy outlined in the **City Plan 2036**, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

An exclusive, luxury hotel will destroy suites of Georgian offices that are a unique survival from this building's long historic past that connects it to a British Literary Giant, Geoffrey Chaucer, who once worked in the customs industry there.

The very idea of '*light box pavilions*' as bars on the roof is an insult to a standing memorial of British trade and commerce once marking London as a world beating destination and business centre. The public has a right to visit and enjoy this building and be proud of the culture that produced such trade and the grand building that survives today.

It also looks very hypocritical, flying the Union Jack whilst leasing off a heritage site in a most unpatriotic manner. At least now keep the character of the building and allow public access for education and cultural appreciation. The arts could do with a boost, so keep London thriving, preserve this building and build back better.

H Street
From the family of Simon Street, the King's Weigher from 1430-1450 (circa)
Cornmount
Talgarreg
Ceredigion, Wales

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 10:12:00

THIS IS AN EXTERNAL EMAIL

Dear Alastair and all involved in the redevelopment of the Custom House,

This is an important and historic building whose long hall and other rooms need to be preserved in a way that gives this building back to London as well as earning the owners revenue.

I would like to object to this proposal as yet again, one of our historic and important buildings is being destroyed to make a hotel. There are so many other ways of changing and reissuing the purpose of this amazing building that I would like to see what other options are available.

With kind regards,

Emma

Emma Parker

Tel: [REDACTED]

From: [REDACTED]
To: [REDACTED]; [PLN - Comments](#)
Subject: Objection to Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 00:06:02

THIS IS AN EXTERNAL EMAIL

Dear All concerned,

It is with shock I received the news of proposed plans to sell off Custom House. Surely, a jewel in our nations cultural and economic history.

As a building it stands as if brick by brick made of British History.

The continuing erosion of public cultural life which contributes heavily to the disillusionment of many of our people has to stop.

Let's consult publically on how to create a place here for us all - Perhaps similar in concept to Somerset House?

A luxury hotel makes nobody proud.

Please urgently reconsider.

Concerned Westminster resident.

From: [REDACTED]
To: [REDACTED]; [PLN - Comments](#)
Subject: OBJECTION - Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 13:15:19

THIS IS AN EXTERNAL EMAIL

I object to the above mentioned application.

This practice is deplorable: a building of such heritage, designed by Wren and Grade I listed, should NOT so easily be disfigured for commercial gain in so turning yet another historical building into a soulless one!

Why are you so intent in destroying London's heritage? Financial gain is not always the answer and when it comes to heritage and the preservation AND conservation of London's treasures, you should think these paramount!

The building should be for everyone to access and use.

I look forward to hearing from you

Regards

Erminia Yardley

[REDACTED]
[REDACTED]
[REDACTED]

--

Erminia Yardley

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION. Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 12:07:25

THIS IS AN EXTERNAL EMAIL

The proposed redevelopment of this Grade I historic building & conversion into another exclusive luxury hotel is at odds with public use for all Londoners.

The City of London's policy (City Plan 2036) gives preference to open heritage spaces of cultural interest such as the unique surviving Georgian office suites, which the commercial development will destroy.

Also the 2 light box pavilions proposed roof bars will compromise the principal frontage.

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 18:16:59

THIS IS AN EXTERNAL EMAIL

Dear sir/madam

I wish to object in the strongest possible terms to the proposed redevelopment of Custom House into a luxury hotel.

You may wish to know why someone living in Colchester would have an interest. It is this. I spent several happy years working within Custom House and marvelling at the wonderful Georgian interiors it had to offer, which are unique in my opinion.

It would be an utter tragedy should this in any way be changed for the making of money, and I sincerely hope that the building would be considered the asset that it surely is and preserved so that multitudes of visitors can enjoy what it has to offer. I can see no reason why it shouldn't be a very successful tourist attraction, especially considering it's closeness to several other world renowned tourist spots within easy walking distance.

My name and address:

Mrs Gail Farrow
9 Wyndham Close
COLCHESTER CO2 8UY

Yours Sincerely

Gail FARROW

From: [REDACTED]
To: [REDACTED]; [PLN - Comments](#)
Subject: OBJECTION - Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 22:48:34

THIS IS AN EXTERNAL EMAIL

Hi there,

I am objecting to the development of customs house based on following points.

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

Gavin Reeve

Tylers Cottage, Weston Street
East Chinnock, Somerset BA22 9EJ
United Kingdom

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION. Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 10:34:19

THIS IS AN EXTERNAL EMAIL

Dear Planning Council,

Creation of yet another hotel and the continuing anonymising of the City of London is hardly what the City really needs.

The 18th century Grade 1 Custom House - striking in appearance and rich in history - is important beyond the City, actually to the rest of the country. Much, much better use can be made of this fine building in ways that it's commercialisation as a hotel, with however many stars or industry endorsements, cannot and never will.

The exclusiveness of a quality hotel seems to be at variance with the City of London's own 'City Plan 2036' in which the goal is, I understand, to open heritage spaces to a wider cultural demographic. It is on this basis that I wish to express my objection to the proposed use of the culturally significant Custom House as a hotel.

Yours sincerely

Gordon Shiach

4 Kirkland Court
Station Road
Kinross
KY13 8UG

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 18 October 2021 11:55:35

THIS IS AN EXTERNAL EMAIL

Planning Application 20/00632/LBC and 20/00631/FULMAJ

I strongly object to the proposed redevelopment of the 18th century Custom House, and wish for my views to be taken into consideration at the upcoming decision meeting on 26 October. London should be proud of it's heritage and reputation as one of the great capitals of the world, and buildings such as this should be kept and made into a place that enhances London's history - there are any number of hotels in London, but only one Custom House. ALL proposed developments like this one (and Brick Lane for that matter) should be dismissed out of hand.

Regards, Graham

Graham Bennett
5 Waverley Close
Odiham
Hants
RG29 1AT

From: [REDACTED]
To: [PLN - Comments](#); [REDACTED]
Subject: OBJECTION to Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 19 October 2021 21:04:31

THIS IS AN EXTERNAL EMAIL

To whom it may concern,

I wish to object to Planning Applications 20/00632/LBC and 20/00631/FULMAJ

The proposed redevelopment of the Customs House would destroy or otherwise jeopardise much of the historic interior of this important London building, including the magnificent long room overlooking the Thames. This room is significant to London's mercantile and cultural history, and should not merely be protected, but made publicly accessible, not destroyed.

The City of London Corporation must ensure that this handsome building be restored and converted to cultural use with public access, as at Somerset House in the Strand.

Yours truly,
Iain Chambers
16 Louisa Gardens, London E1 4NG

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Objection
Date: 20 October 2021 12:16:38

THIS IS AN EXTERNAL EMAIL

Re Planning Applications 20/00632/LBC and 20/00631/FULMAJ

It seems criminal to me that the Custom House between Lower Thames Street and the River Thames is to be transformed into what will no doubt be a very expensive hotel.

There is a lot of history in that place and to rip out the historic innards of the building would be such a sad thing to do.

I am sure that given its position on the River Thames, there would be scope for a much more sympathetic development that would still comfortably pay its way. It is a great tourist area and should be open and available for all.

I worked in the building for about 14 years and have a great fondness for it.

regards

Ian Press
8 Pattern Bush Close
Brantham
Manningtree
Essex CO11 1RT

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 16:08:18

THIS IS AN EXTERNAL EMAIL

The Custom House is Grade 1 listed and is a prominent and significant building fronting the Thames. It was owned by HMRC but is now owned by Cannon Capital, part of Mapeley Steps, an offshore property developers (based in the tax haven of Bermuda) who purchased it a few years ago from HMRC. The company has submitted a planning application for an unsympathetic conversion to a luxury hotel that will be destructive to the fabric of the building, including unique survivals like its Long Room and suites of 19th century offices, which will damage its historical significance. In addition, allowing an exclusive luxury hotel development on this site contradicts the City of London's policy (outlined in the City Plan 2036) to boost office-led cultural use with the aim of opening heritage spaces to a wider cultural demographic.

Please can the planning committee take note that the Sunday Times reported in 2016 that Mapeley Steps was set up to legally avoid tax of £170m on a government deal, and the controversy over this deal has now been reignited (as reported in the Daily Telegraph in March - see below). May I suggest that the planning committee acquaints themselves with this information, please, and takes it into consideration when considering their decision.

<https://www.telegraph.co.uk/business/2021/03/28/custom-house-hotel-makeover-reignite-deal-controversy/>.

The precedents of nearby Somerset House and Tate Modern show how the Custom House could be put successfully to public use again, creating both imaginative and profitable public space. SAVE Britain's Heritage have prepared such an alternative suggestion, in which the Long Room in the building should be kept and south-facing riverside opened for permanent public access with riverside cafes, restaurants and bars.

As a London resident, I strongly object to this planning application, and hope that the Planning Committee will decide in favour of a transparent scheme to benefit London and its residents, respect this part of our heritage and comply with the City Plan.

Sincerely

J.A. Woolf
17 Canfield Gardens
London NW6 3JP

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 17 October 2021 07:58:50

THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam,

Re : Planning Applications 20/00632/LBC & 20/00631/FULMAJ

I used to live in Wapping High St, and therefore I am very familiar with London's riverfront.

I heard that plans are drawn up and permission is being sought to redevelop Customs House into a hotel. A building of such great presence and history deserves NOT to be turned into a hotel, but better it be preserved. With such a great history, the public deserve to see the building in all its glory, allowing public viewing and a reminder of the history of the area over the centuries.

Another luxury hotel is not needed.

Yours faithfully,

Jeremy Brown
12 Mountview Close
London NW11 7HG

Cc Alistair Moss

Sent from a parallel universe

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 18 October 2021 12:32:44

THIS IS AN EXTERNAL EMAIL

REGARDING|:

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I wish to lodge an objection to the above proposals and redevelopment of the Customs House.

This is an important building that should be given over to public use and any destruction of the interior would be a huge loss to the history of London. The destruction of the Georgian office interiors would be an awful loss, and the addition of light box pavilions as bars will cause the frontage to be incredibly unsightly and ruin the character of the building.

The exclusivity of the luxury hotel development contradicts the City of Londons policy as outlined in the City Plan 2036.

This building chronicles Britains famous nautical history that belongs to the nation and should not be destroyed for profit, but preserved for the future.

Best wishes,

Joel Gorf

My postal address is
Flat 18,
The Academy, Highgate Hill,
London
N195NS

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION to Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 16:09:05

THIS IS AN EXTERNAL EMAIL

To whom it may concern

I OBJECT to the above referenced application(s) relating to proposed development of The Custom House London (Lower Thames Street)

As a listed building The London Custom House is part of our National Heritage and should be preserved and restored as a National Asset available to the general public, perhaps as a National museum /cultural asset reflecting the historical significance of the Port of London as a trading centre and gateway to the UK.

John Butler
141 Victoria Rd
Dartmouth
TQ69EF
Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION - planning applications 20/006/32/LBC & 20/00631/FULMAJ
Date: 17 October 2021 12:54:43

THIS IS AN EXTERNAL EMAIL

Dear Sir / Madam,

I am writing to lodge my objections to the above as a Londoner and keen supporter of retaining the little left of London's irreplaceable heritage .

In particular ;

- the proposals would deny any access to the public to this unique heritage building . This is in contradiction to the City of London's own plan . Alternative options providing a public space and access to the Long Room have been prepared but do not appear to have been considered.
- the proposal would mean the destruction of a suite of Grade 1 Georgian offices
- the proposal includes the addition of two " light box " extensions to the roof which would irreplaceably harm the vista from the river.

In conclusion the City of London has over many years continually displayed contempt to the retention of what is left of its architectural heritage and the public's desire to use and access these spaces. The only consideration seems to be profit generation and the ambitions of "big business developers". The path followed is fast leading to a city of poorly repurposed buildings and anonymous over sized glass and steel monoliths creating wind tunnels of unattractive overshadowed streets. You do not appear or want to appreciate that London's main appeal to visitors and residents is the heritage and character which you are hell bent on eradicating .

Yours

Julie Selhep
48 Albert Square
London E15 1HH

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION to Custom House planning applications
Date: 18 October 2021 10:44:44

THIS IS AN EXTERNAL EMAIL

OBJECTIONS REGARDING: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Planning Department / Alastair,

I am writing to submit my Objections to the above mentioned planning applications as I believe this spectacular Grade I listed building of strong historical significance to British heritage should be preserved for the public / cultural use rather than be privately owned. The proposed works will not only block public from enjoying this building but also destroy original Georgian features, compromise the city skyline with inappropriate roof pavilions and set a precedent for other cultural sites to be bought up and developed by unscrupulous developers.

Kind regards,
Lara Schroder
23 Abinger Place, Lewes, BN7 2QA

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Custom House SAVE IT FOR THE NATION!
Date: 17 October 2021 18:04:16

THIS IS AN EXTERNAL EMAIL

Sirs: we beg of you NOT to grant permission for the Historic Custom House to be turned into an hotel.

Please, save it for the Nation! Far, far too many historic buildings and even entire neighbourhoods (for example, Spitalfields) are threatened by the blight of new development. This building should be, at the very least, preserved intact — we, ourselves, should like to see it as a Museum — so that future generations can see a vital part of England's, and London's, history and heritage.

What use is yet another Hotel, especially in post-pandemic times? Who knows when — or if— the need for new hotels will ever return? Meanwhile, what's done cannot be undone. Your decision will decimate an important part of London's infrastructure for a development of no importance, and probably not even much use.

Please: save the Custom House. Thank you.

Ms. L Burch
25, Maiden Lane
London WC2E 7 NR

Sent from my iPad

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection - Customs House
Date: 21 October 2021 13:42:03

THIS IS AN EXTERNAL EMAIL

Dear planning team,

Re: Objection to **Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

I strongly object to the conversion of Custom House into a luxury hotel.

In the first instance, it is at odds with the City of London's policy to keep heritage assets open to the wider public, not just those wealthy enough to afford luxury hotels.

And secondly, the loss of historic fabric to a Grade I listed building is totally unnecessary. A hotel would require extensive servicing and subdivision. Grade I status is given to just 2.5% of all listed buildings and therefore such an invasive scheme which includes the removal of such important elements such as the rare surviving Georgian offices is wholly unacceptable. In no way is this scheme 'reversible'.

Whilst there is a option to keep this building in a cultural use for the benefit of London and Londoners, there can be no justification for approving a hotel scheme.

Kind regards,

Maddie Pierson
66 Coldharbour Lane
Bushey
WD23 4NY

From: [REDACTED]
To: [REDACTED] : [PLN - Comments](#)
Subject: OBJECTION
Date: 17 October 2021 07:30:39

THIS IS AN EXTERNAL EMAIL

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Flat 10, Cobalt Building, Bridgewater Square, London EC2Y 8AH .

Dear Sirs

When I walk on the south side of the Thames or visit St Dunstan church nearby I marvel at the wonderful Custom House building. When I realised that there were plans to turn it into another hotel I was horrified; it has such a fascinating past and is integral to London's history. I should very much like to visit the building - the famous long room and little offices branching off - and can't imagine the damage that would be done to it by it becoming a hotel.

I am sure that the local community could use it profitably and the long room would make a splendid games room, in the same way as some country houses had a long gallery in which people could walk and exercise during inclement weather. Art workshops, children's areas, communal spaces for older visitors and possibly somewhere that people could bring their dogs. Restaurant, gallery, theatre, music studios, there are endless interesting possibilities. It could be a joyful place rather than a static hotel.

Please do not allow the hotel plan to go ahead.

Margaret H Gadsden

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection to planning applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 19:42:45

THIS IS AN EXTERNAL EMAIL

Dear sir

I am writing to object to the planning applications submitted for the Custom House building, proposing to convert it into a luxury hotel. I am frankly amazed that such a development to an iconic Grade 1 Listed building is being considered at all, let alone one which will inevitably result in the destruction of some of the buildings unique internal features.

My specific objections are

To the destruction of unique internal features of the building

To the addition of structures for a rooftop bar which will irrevocably change the external aspect and compromise its Listed status.

I also want to refer back to the City of London's own excellent City Plan 2036 which sets out aims which are at odds with this development; the CoL's vision for cultural use by the people of London, supported by office space development seems impossible to reconcile with these plans for yet more hotel space. London does not need more hotel rooms - it needs to preserve and protect its unique heritage so that future visitors will be attracted to come to London (where they will be amply served by the existing accommodation).

i believe that by rejecting this destructive proposal the City of London could be a key promoter of appropriate uses for the Custom House, in keeping with the CoL's record of support to projects enhancing the lives of Londoners.

Yours faithfully

Mark Gorman
151 Capel Road, London E7 0JT

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION to Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 10:28:49

THIS IS AN EXTERNAL EMAIL

I Strongly object to the plan to turn the Custom House into a luxury hotel which would take this important cultural historical building away from Londoners and visitors.
I Strongly support the Save Britain's Heritage's scheme to restore it to public advantage so all people can benefit from it particularly the amazing Long Room and keep it's integrity.

Sincerely

Max Reeves
29 Wheler House
Quaker Street
LONDON E1 6SS

--
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Custom House
Date: 18 October 2021 21:48:15

THIS IS AN EXTERNAL EMAIL

Dear Sirs, Madames; I write to urge you to reconsider the proposed development of Custom House. As a US citizen we have always looked to Europe for leadership and inspiration on how places should be respected and preserved. Please do not disappoint us! We need your sound leadership now more than ever! Please consider the endless possibilities for that marvelous structure that do not include luxury hotels, etc,. Thank you.
Respectfully, Melissa Delano PO Box 1820 Santa Cruz, New Mexico 87567 USA

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 21 October 2021 10:46:45

THIS IS AN EXTERNAL EMAIL

Sirs,

The Customs House
20/00632/LBC. 20/00632/FULMAJ

Do you not think that London has lost enough of its valued old buildings without having to suffer the loss of another?

Yours sincerely,
Michael Jones.

London. N22 8PY

Sent from my iPad

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 13:21:54

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

I object to the planned changes to the Custom House for the following reasons:

1) This magnificent grade 1 listed building has played a key part in Britain's heritage as a world-wide maritime nation; it represents an important aspect of Empire, trade and colonialism - a physical manifestation of our "island story." As such the Custom House needs to be open and accessible to all members of the public rather than for the exclusive use of those who can afford luxury hotel rates.

2) The City of London has the opportunity to add to the public domain and the glory of London's waterfront and provide an invaluable space for Londoners as with Tate Modern and Somerset House.

3) Interior developments for a hotel threaten to destroy the unique features of the Custom House, such as the Long Room - an act of cultural vandalism.

4) City Plan 2036 emphasises the priority for creating opportunities for heritage spaces to attract a wider cultural demographic into London's cultural areas. A luxury hotel on the site of the Custom House does not honour this.

Michael O'Leary

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 09:23:16

THIS IS AN EXTERNAL EMAIL

To Whom It May Concern,

I am writing to express in the strongest terms my objection to further destruction of historical buildings in Spitalfields. The consideration of the stunning Grade 1 Historic Custom House being converted into a hotel is ridiculous and another example of money and profits being prioritised over history and culture. Do we really need another hotel at the expense of a piece of our heritage?

I look forward to your response and sincerely hope that objections such as mine are considered seriously, and not just discarded by businessmen keen to make a quick buck.

For the record and purpose of this objection, my address is 28 Grange Road, Elstree, Herts WD6 3LY.

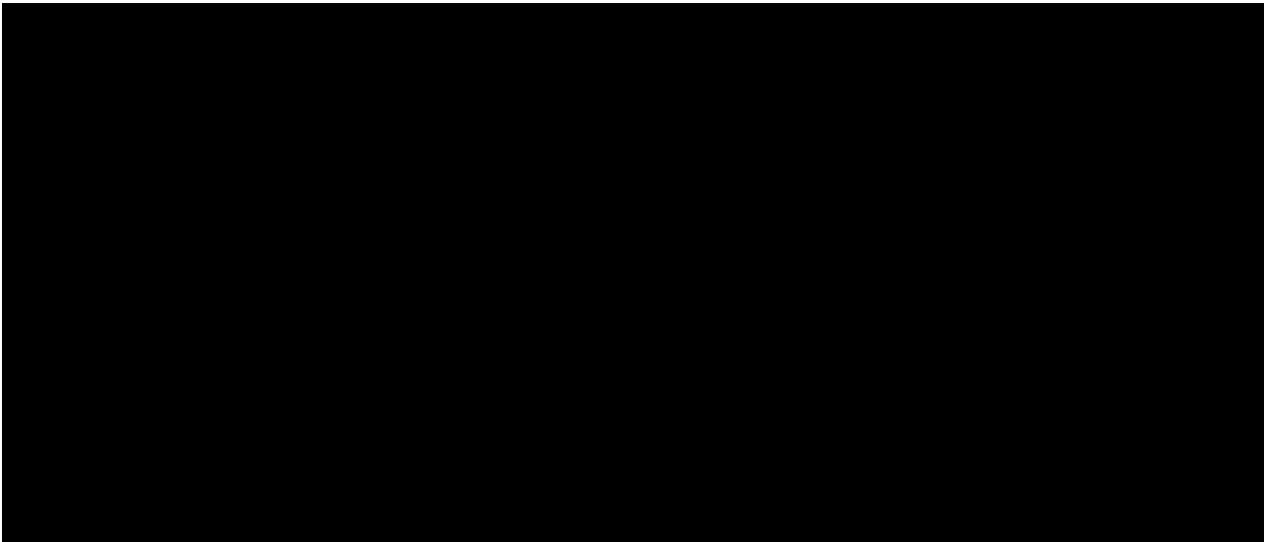
Yours sincerely,

Michelle Rosenberg

Michelle Rosenberg

[REDACTED]
[REDACTED]

Mobile: [REDACTED]



From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 19:35:06

THIS IS AN EXTERNAL EMAIL

Re Planning Applications 20/00632/LBC and 20/00631/FULMAJ, the proposed conversion of The Custom House into a hotel. I strongly object to the proposed works. A grade 1 listed building of such historic significance to London will be lost when repurposed as a just another hotel. There is no interest at all got the nation for this conversion. All the original character of the interior will be destroyed. Abs I believe even much of the facade will be altered. That in itself is scandalous. Please turn down these applications.
Regards,
Mike Oughton

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 19 October 2021 07:57:39

THIS IS AN EXTERNAL EMAIL

Re: planning application 20/00632/LBC
20/00631/FULMA

City plan 2036 states one of the City of London's ambitions is to open heritage spaces and to attract a wider cultural audience in general to London, yet the plans of the offshore leaseholders of Custom House are in direct opposition to this? This, of course, could be due to the fact they themselves could be classed as the wider cultural audience, unaware of Londons rich cultural heritage, slowly slipping away, so I ask them to please look again.

Unique Georgian offices, with so many stories within their structure, gone forever?

I read of the planned light box pavilions with a sinking heart, I used to live, too, near Blackpool, and remember something similar being mooted. Please, no.

I ask for a complete and sympathetic review of the plans as above.

Yours Sincerely,
Nic Shore
73, Dudley Court
London WC2H 9RH
[REDACTED]

Get [Outlook for Android](#)

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 11:25:06

THIS IS AN EXTERNAL EMAIL

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I wish to lodge an objection to the redevelopment.

D4\!d

96 Thetford Road
NEW MALDEN
KT3 5DZ

Cc to [Chair of Planning & Transportation Committee](#)

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection Custom House (Planning Applications 20/00632/LBC and 20/00631/FULMAJ)
Date: 19 October 2021 16:42:47

THIS IS AN EXTERNAL EMAIL

Dear Planning Committee,

I gather that the owner of Customs House has applied for the change of use of Customs House to a hotel.

As a Londoner living and working in this amazing city I am writing to object to these plans which would allow a change of use and the destruction of such a historical building.

We have enough hotels already , enough! This building belongs to the people. We cannot destroy the Long Room and the elegant offices which was the basis for all Custom Houses architecture around the world . This must not go ahead. The river and the City have already been changed beyond all recognition so we must try and keep this listed building intact and reopened.

It is time to use this building for people working and visiting London - almost like a Somerset House which has been so successful and which my family and I visit regularly.

One suggestion what it is connected to the Monument and Tower Bridge would be marvellous.

Many thanks

Patty and Robert Harper

70 Beauval Road

London SE22 8UQ

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: objection Customs House
Date: 18 October 2021 17:51:04
Attachments: [Screenshot 2021-07-18 at 14.04.00.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I write to object to the proposed plans for the development of The Customs House. This is because the exceptional Grade 1 building would be marred forever by the loss to an hotel.

The internal arrangement of rooms and their adjacent uses would be completely lost . Also the proposed carbuncle glass pavilions would maim the sublimely grand fascia.

While I am objecting to this particular proposal I should also like to say that the idea is a complete destruction of a type of building which the City has great need of.

As the city needs to move to a cultural centre and hub for tourism this jewel of a building should not be lost to the public . Many uses could be devised for the spaces which would be a joy to use as a Londoner as Somerset House is further up river. An imaginative scheme should be devised to enhance this treasure not destroy it.

I would like you ,please, to reject this planning proposal outright,
Thank you for reading my email ,

Yours faithfully,

Paul Dyson

PAUL DYSON DESIGN
85 Blackfriars Road
London SE1 8HA

Telephone
[REDACTED]

www.russianimperiallapidary.com

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 11:58:29

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I wish to object to these applications to redevelop the Customs House as a hotel.

This very important 18th C building needs to be protected and preserved, and used for some cultural purpose. The City Plan 2036 suggests preference for such buildings should be to open their heritage space for such use.

It must not be allowed to be converted to a hotel, with the loss of unique sets of Georgian offices, and the destruction of other wonderful features of this Grade 1 listed building. The proposed plans are tacky, and an unsympathetic conversion.

Regards,

Richard Herbert
Hovells
10 Frogge Street
Ickleton
Cambs
CB10 1SH

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 19 October 2021 22:23:21

THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam,

I object strongly to the proposed development.

London does not need another luxury hotel, and the conversion of the building for this intended use would be a travesty and a sacrilege, given the internal destruction of the original features that the plans entail. As a prestigious building, it should be retained to enhance its character and value as a facility for the public to enjoy, not for wealthy visitors alone, and not to benefit an offshore company with no interest in this valuable part of London's historical heritage for its own sake but simply greedily seeking profit.

We cannot go on destroying our heritage in this way: many parts of London have been irrevocably spoilt by inappropriate developments both internal and external, and on this riverside site the retention and enhancement of the building must be the priority.

Yours faithfully,

Dr Robert Cassels.

24 Duxford Road
Whittlesford
Cambs.
CB22 4ND

[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 18 October 2021 23:00:59

THIS IS AN EXTERNAL EMAIL

To whom it may concern

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I have been reading about your plans to turn The Custom House into another hotel.

This is a plea from a very average someone who loves buildings to allow a historical building to be restored to its former glory and use so that the magic of London buildings can continue to dazzle the next generations.

We have so much to be proud of in this great city, so much history and beauty. Please don't destroy part of the fabric of this.

Thank you for your consideration
Rochelle Shorrick

[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 17 October 2021 20:01:51

THIS IS AN EXTERNAL EMAIL

Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I object to this planning.

The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

The hotel development will destroy suites of Georgian offices that are a unique survival.

The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

I strongly object to this.

Postcode W128QJ

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 08:38:01

THIS IS AN EXTERNAL EMAIL

Re: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I strongly object to the current proposals to convert the London Custom House into a hotel.

Customs House is a vital part of London's heritage and our cultural identity. London is already swamped with luxury hotels which are unaffordable for the majority a building of such historic importance deserves to be preserved intact and for public usage.

In addition to the negative historic and cultural impact this development would cause there would also be limited taxpayer returns from the offshore investment company.

Regards

Shirley Pigott

101 Pelham Road, London, SW19 1NX

From: [REDACTED]
To: [PLN - Comments](#); [REDACTED]
Subject: OBJECTION
Date: 17 October 2021 14:31:01

THIS IS AN EXTERNAL EMAIL

Re : **Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

Dear Sir/Madam

I object to the proposed application for turning the custom House into a hotel. London is already losing too much of its old stock and with it, the character that comes from having old buildings with rich period interiors.

the opportunity to create another hotel is surely not dependent on the loss of this historic building.

Yours faithfully.

simon hardy

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 17 October 2021 10:51:21

THIS IS AN EXTERNAL EMAIL

Re : **Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

I am writing to record my objection to the plans to convert the historic Custom House into another Hotel.

Please do not destroy this part of our heritage.

I am in favour of retaining the appearance and structure of the building in a way that is useful whilst retaining its historic essence.

Steve - Sent from my iPad

53 Burwell Road
Leyton
London E10 7QG

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION-Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 09:07:46

THIS IS AN EXTERNAL EMAIL

Dear Sir,

Re: PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel when it should be put back to public use for all Londoners.

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

Yours sincerely,

Thomas Rashbrook
45 Carlton Road
Lowestoft
Suffolk
NR33 0 RU

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Subject: PA 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 13:45:29

THIS IS AN EXTERNAL EMAIL

I strongly object to these applications .

1. They destroy the historic heritage of London's commercial and architectural importance.
2. Additional hotel space is not needed and is inappropriate use of this historic building.
3. The building should be used and retained as a monument to London's past and for the benefit of the population at large.
4. The current planning procedures and those who implement them are not adequate to comprehend the importance of this building on its architectural and historic context.

Timothy Hill
Community Charge payer of London (Camden)
14 Elaine Grove
London NW5 4 QG

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 17 October 2021 19:39:23

THIS IS AN EXTERNAL EMAIL

Applications 20/00632/LBC and 20/00631/FULMAJ

Dear sir/madam,

I object to the customs house redevelopment proposal.

The Custom House should have its rich heritage preserved and not be sold off for yet another soulless hotel development on the site. The plans for a hotel are short sighted and will not benefit the cultural capital of London in the long run.

Please do not commit this atrocity.

**Regards,
Zohra khanam
7 Blondin street
E3 2TR**

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ :OBJECTION
Date: 19 October 2021 15:55:46

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

I write to you with a sense of outrage on having read of the proposal to convert the Custom House into a luxury hotel.

I have lived and worked in London for most of my life, and have frequently walked alone, with friends and with groups of tourists past this historic building. The location and history of this building demand that it be treated with the respect due to it, and that it should be put into public use for all Londoners.

That this proposal, by offshore leaseholders with an interest above all in extracting yet more money from a property in central London can be considered, is a sad reflection on the state of our city.

In particular detail,

The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use'

The hotel development will destroy suites of Georgian offices that are a unique survival.

The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

I ask you to refuse planning consent to this dreadful application.

Sincerely

Alan Cooper
291b Upton Lane
Forest Gate
E79PR

From: [REDACTED]
To: [PLN - Comments](#); [REDACTED]
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ Objection
Date: 18 October 2021 04:28:55

THIS IS AN EXTERNAL EMAIL

Objection to **Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

Dear Sir

I object to the offshore company's designs for the Custom House - a building significant for London's heritage and Great Britain's heritage. Not only is it reprehensible and morally questionable at this time of increasing utility bills and taxes on the ordinary working and middle classes to allow a company based in a tax haven (which pays no tax to the U.K. and its sole purpose is to line their own pockets and not contribute to the U.K.) but to allow such vandalism on a historically important building.

I urge you to consider alternative proposals that consider the historical importance of the building and that will allow the U.K. public access to this great site. Soon, all of London will have been turned into soulless homogenous 'luxury hotels and flats' owned by non resident tax avoiding companies. It will be a ghost town of facades and glittering glass boxes.

Read the room - see how people craved to visit historic sites, parks and places of public interest during Covid.

Read the room - why is London allowing such desecration to historic buildings by companies who make no substantial tax contributions and who do not care about our heritage - they're not even based here.

Regards

**Alison Lynch
32 Field Heath Avenue
Uxbridge
UB8 3PD.**

Sent from my iPad

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION RE plans for Custom House London EC3R 6EE
Date: 20 October 2021 14:45:47

THIS IS AN EXTERNAL EMAIL

To the City of London planners

Planning Application references 20/00632/LBC and 20/00631/FULMAJ

Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE

Taking away publicly accessible and usable space from one of London's most important public buildings, internally and externally, is clearly not a public benefit in the City of London. The proposed lack of access harms the significance and threatens the future of this building as a heritage asset. The cultural status and location of this building on the River Thames and in the heart of London demands the best solution for the public.

I strongly object to the proposals.

Annabel Downs

2 Jerviston Gardens
London SW16 3EL

Ms Jessica Robinson
Department of the Built Environment
City of London Corporation
PO Box 270,
Guildhall,
London EC2P 2EJ

By email to: PLNComments@cityoflondon.gov.uk

[REDACTED]
[REDACTED]

Our reference: 21100

18th October 2021

Dear Ms Robinson,

Planning Application 20/00631/FULMAJ [Appeal Reference APP/K5030/W/21/3281630] & Listed Building Consent Application 20/00632/LBC [Appeal Reference APP/K5030/Y/21/3281258] - Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE.

SAVE Britain's Heritage has written on three previous occasions regarding the above planning and listed building applications on 26th October 2020, 22nd January 2021 and 13th August 2021. Following notification that the plans will be heard at the Planning and Transportation Committee on 26th October 2021, we wish to submit the following documentation outlining our detailed objection to the proposals in support of officer recommendation to refuse both applications.

I ask that these and our previous submissions be given careful consideration by members of the committee, and that SAVE is informed of any further decisions on consultations regarding these applications.

Yours sincerely,

[REDACTED]

Benedict Oakley
Conservation Officer



SAVE BRITAIN'S HERITAGE STATEMENT OF OBJECTION

A CULTURAL POWERHOUSE: THE CASE FOR PUBLIC ACCESS

Site Address: Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE.

LPA Refs: 20/00631/FULMAJ & 20/00632/LBC

PINS Appeal references: APP/K5030/W/21/3281630
APP/K5030/Y/21/3281258

Date: 7th October 2021

SUMMARY POINTS

- 1. Custom House is a Public Building with a long history of public access, equivalent to Somerset House**
- 2. Public access is critical to conserving its significance as a heritage asset**
- 3. Public access to the interior (including the Long Room) and to the Quayside Terrace is critical to securing the City Corporation's vision for regenerating the Riverside**
- 4. The current proposals do NOT provide adequate permanent unencumbered public access to the interior or to the Quayside Terrace**
- 5. The potential requirements of the hotel for private and exclusive events appear to take precedent over public access**
- 6. The lack of adequate public access is harmful to the significance of the building**
- 7. The proposals involve the loss of unique historic fabric in the West Wing**
- 8. The glazed roof pavilions harm the appearance of the building**
- 9. The public benefits offered by the applicant do NOT outweigh the harm caused by the proposals**
- 10. SAVE will make sure these concerns are raised at any public inquiry**

CUSTOM HOUSE QUAYSIDE



CUSTOM HOUSE LONG ROOM



SUMMARY

1. SAVE Britain's Heritage strongly supports the Planning Officer recommendation to refuse both the planning and listed building consent applications. SAVE agrees that the proposed alterations and extensions to the West and East wings cause harm to a designated heritage asset of the highest national significance. SAVE considers that this harm is NOT outweighed by adequate public benefits.
2. Most importantly, we consider that the proposals fail to provide the degree of public access which the significance of this historic public building justifies and demands. We consider that permanent public access to the quayside terrace and riverside path must be secured in perpetuity to meet the strategic policy visions of the City Corporation and the GLA. We consider that permanent public access must also be secured to important internal spaces within the ground and first floor of the Custom House in order to preserve the special significance of the heritage asset as a public building. The current situation presents a unique opportunity to re-open the building to the people of London.

BACKGROUND

3. SAVE has written on several occasions commenting on proposals to convert the Custom House into a hotel, most recently on 13th August 2021, objecting in detail to the latest plans. It supports the objections of the Georgian Group and others to the harmful impact caused by the loss of the rare surviving historic offices in the West Wing and the harmful impact on views of the building caused by the proposed glazed roof extensions to the East and West wings. However, the main thrust of SAVE's concerns rests with the issue of public access to the important historic public spaces within the building and the reinstatement of full and unencumbered public access to the quayside terrace facing the river.

SIGNIFICANCE OF THE CUSTOM HOUSE AS A HERITAGE ASSET AND A PUBLIC BUILDING

4. The Custom House is a grade I listed building. Its very high heritage significance is widely acknowledged, even though it remains comparatively little known to the general public because it has been largely closed to the public in recent decades. Its significance derives from all four criteria identified in Annex 2 of the National Planning Policy Framework (2021), those being archaeological, architectural, artistic and historic interest. These categories broadly accord with those set out previously in Historic England's Conservation Principles, namely evidential, historical, aesthetic and communal.
5. Much has been written about the architectural, archaeological and historic interest of Custom House and the site that the current building and its predecessors have occupied for many centuries. However, less has been said about its importance to the City, to London and to the whole country as a public building that has shaped the development of the nation for hundreds of years. As a venue for traders to gather and the interested public to meet, to conduct business and transactions with government officials, and to exchange news and information, it has played a huge part in the economic development of Britain, even greater than the Royal Exchange.
6. The Long Room at the heart of the building is one of the most magnificent spaces in London, and was at one time said to be the largest room in Europe. The illustrations and depictions by artists such as Rowlandson of the assembled throng within the Long Room demonstrate its importance as a meeting place and mixing pot for a wide cross-section of contemporary society. Much of the historic significance of this wonderful space lies in its public function, even though it has most recently been in desultory office use.
7. The space around the Custom House building is crucial to its setting. It is known that the quayside was originally unfenced and open to the public, to the extent that sentry boxes were installed to control crowd behaviour, and seating was put in by the Metropolitan Public Gardens Association in 1891, followed by tree planting by the Office of Works in 1903. After the Second World War the quayside terrace was commandeered by HMRC for car parking, and blue-painted railings were

erected in the 1990s to separate this from the riverside Thames Path. The railings detract from the setting of the building and from the appearance and function of the quayside terrace, but the removal of this redundant barrier should now be a straightforward matter.

8. With its very prominent position on the Thames, Custom House is comparable to Somerset House, which once housed its own great offices of state, although the immediate connection and proximity of Custom House to the river is now much greater following the separation of Somerset House from the river by the Victoria Embankment. Indeed, the powerful and dignified presence of Custom House and its spacious quayside terrace fronting the river are akin to County Hall, Tate Modern and the South Bank arts centre.
9. The historic function and public accessibility of Custom House makes a crucial contribution towards its heritage significance and should be a primary guide in deciding its reuse now that HMRC have vacated. The fact that public access was curtailed at various times during the 20th century, compounded by the security fencing to protect car parking from the newly-created riverside path, should not deflect from or dilute this purpose.
10. The same enlightened strategy that achieved the spectacular regeneration of Somerset House (once similarly blighted by car parking and governmental security) should be applied to Custom House so that it can once again be one of London's great public buildings, exploiting and maximising its riverside location. This will ensure that its significance as a heritage asset is preserved.

POLICY

11. The National Planning Policy Framework (NPPF), July 2021, states that, in determining applications, account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Annex 2 makes it clear that conservation is the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
12. There is a very strong and broad-based policy framework to require and support public access, cultural activity and public open space at Custom House, including the GLA's River Thames Cultural Vision and the City of London Plan 2015, the City Cluster Vision, Cultural Strategy 2018-2022 and Open Spaces Strategy. The draft City Plan 2036 shows Custom House and its quayside terrace as a key location for regeneration and new public open space.
13. Custom House occupies a key position between London Bridge and the Tower of London which will be crucial in achieving this vision. It is arguably a key site in the continuing evolution of the City. Together with the Cultural Mile along the northern edge of the City, the development of the City's riverside for similar cultural and community activities offers the potential for a 'ring of culture' to encircle and embrace the Square Mile, replacing what was once a ring of 1950s dual carriageways and then a 1990s 'ring of steel'.

ASSESSING THE PROPOSALS

14. NPPF (2021) Paragraph 199 states that great weight should be given to the asset's conservation, and that the more important the asset, the greater the weight should be, irrespective of whether any harm is substantial or less than substantial. Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

HARM CAUSED BY THE CURRENT PROPOSALS

15. SAVE agrees with the concerns raised by others over the harm caused by the loss of the historic and unique surviving offices in the West Wing, and by the damage to the skyline and various views of the

building, particularly from the south bank of the river, caused by the proposed construction of glazed roof extensions to the East and West wings.

16. SAVE's main concern is that the proposals will not provide the degree and perpetuity of public access that are necessary to preserve the significance of the heritage asset which derives so greatly from its historic public use. The effective privatisation of the vast majority of the interior, with only restricted public access to limited areas, will detract from the significance of the building.
17. SAVE agrees that the level of harm is less than substantial, but nevertheless is at the middle-to-upper end of that scale of harm for the reasons set out above.

ASSESSMENT OF PROPOSED PUBLIC BENEFITS

18. The applicant is offering various public benefits as part of its proposals. National Planning Policy Guidance (2014) states that public benefits can be economic, social or environmental and should be of a scale or nature to be of benefit to the public at large and should not just be of private benefit.
19. It is worth noting how the Charity Commission defines 'public benefits' (Guidance published September 2013). It states that there are two components of public benefit, the 'benefit aspect' and the 'public aspect'. The 'benefit aspect' is about whether the purpose is beneficial. As well as stating that the purpose must be beneficial it also states that any detriment or harm that results from the purpose must not outweigh the benefit.

Bringing the building back into use

20. The existing building is in good condition. No evidence has been provided to suggest otherwise, or that it is deteriorating. Indeed, extensive repairs were carried out in 1992, overseen by SKF Architects, involving large amounts of public money. The existing building is not on any register of Heritage at Risk, or immediately vulnerable.
21. While there are no other definitive proposals on the table, it is perfectly conceivable that there might be alternative schemes that would bring the existing building back into beneficial use. Given the considerable sale price of the site there can be no suggestion of any conservation deficit with proposals for reusing the building.

Improvements to historic fabric

22. The scheme includes various reinstatements of a few historic doorways and removal of recent intrusive services. However, these improvements are minor, and in terms of services, will be required in any event. They are far outweighed by the harm to existing historic fabric, particularly the loss of the historic offices in the West Wing and alterations to the original roof form.

Public Access

23. The applicant's introduction to its Cultural and Community Strategy (May 2021) states that '*Custom House and its associated quayside have historically been off limits to the public. Custom House has by its very nature been a secure and secretive building since it was first sited here*'. Nothing could be further from the truth. It displays an astonishing ignorance of the former history and function of one of Britain's most important public buildings.
24. The applicant's offer for public access must be considered within its historical context, not simply in comparison to its most recent past when public access to the building and quayside has been prevented.
25. The securing of public access to Custom House and its quayside in perpetuity should be regarded as a required reinstatement, rather than something completely novel. While the applicant's offer might

superficially appear attractive, the reality of the proposals is that public access within the building and outside will be considerably limited.

Access through the building

26. The proposed public through-route at ground floor level running north-south from Lower Thames Street to the Quayside terrace is a narrow pathway, and times of access may be restricted, subject to 'events' on the quayside. It is not clear what these might be, or what form of security will be adopted in the hotel foyer to vet anyone seeking to gain access. The public entrance is also the hotel entrance, where hotel clients and their bags will arrive and depart. A coach bay is proposed outside on Lower Thames Street. It is understood that the applicant has been requested by planning officers to make the dedicated public route more generous in width, but this has been declined because of the operational requirements of the hotel and its front-of-house. There is a risk that the general public may be deterred from trying to gain access on a casual basis.

A Museum

27. The Museum proposed is, in principle, a welcome component of the ground floor plan on the West Wing. However, it is not clear how permanent or independently funded and operated this might be. The proposed opening hours of the Museum are restricted to 10.00 – 16.00 on weekdays and 10.00 – 12 noon at weekends, which implies that the space is intended for other use outside those limited hours. This is particularly regrettable at the weekends when one might expect the greatest number of visitors to a museum.

Views from the roof pavilions

28. Free public access from the Museum to the roof top viewing area in the roof extension above the West Wing has the same restricted hours as the Museum. Outside those hours access is available only by booking a table in the restaurant. The proposed restaurant and bar in the new East Wing roof pavilion is only open to those who book, never open for casual visits.
29. In both cases these roof top extensions appear to be primarily restaurants with controlled access, rather than public viewing areas. They do not appear to be areas which the general public can access on a casual basis in the evenings or on weekend afternoons, as is the case for example at the top-floor café in Tate Modern. There are, of course, other places nearby, notably the Monument and Tower Bridge where the public can enjoy high level views of the river and the surroundings.

The Long Room

30. The proposed public access to the Long Room is highly restricted, limited to accompanied tours only, and with a total of 24 timed slots (each of 3 – 4 hours) per year. These times would be controlled by the hotel's Heritage Partner, and entirely at the discretion of the hotel operator. It is not at all clear how any booking system would be run, or whether hotel 'events' would take precedence.

External Public Access

31. It is unclear how all or parts of the quayside terrace might be closed off to the public for special events or private lettings run by the hotel, or how often this might occur. It is unclear how this might affect continuous access along the riverside path. The red line on the application drawings shows that the riverside path lies within the application site, and thus within the ownership of the applicant. The indication that events held on the terrace may be ticketed, or exclusively for hotel guests, implies that security fencing or barriers will be required. It is unclear how many days each year areas may be cordoned off '*where events are being set-up or taken down, or where secure management of events requires it and where maintenance and safety requires it*'. The policing and enforcement of this to maximise free public access could be fraught with difficulties and disputes.

32. It should be noted that the terrace between Old Billingsgate Market and the riverside path is completely open, with no fencing or barriers, or level changes. It effectively operates as a public open space, open at all times. An unencumbered riverside frontage and terrace at Custom House would facilitate the future mooring of historic ships or other floating accommodation and visitor attractions.

BALANCING HARM AGAINST PUBLIC BENEFITS

33. SAVE considers that public benefits proposed by the applicant are limited, ill-defined and potentially difficult to sustain. They do not come close to outweighing the very considerable harm caused to the significance of the heritage asset, both in terms of loss of historic fabric and the failure to reinstate in perpetuity the level of public access internally and externally that this important public building warrants.

ALTERNATIVE PROPOSALS

34. National Planning Policy Guidance (2014) provides advice on Optimum Viable Use: *'If there is a range of alternative viable uses (for a site), the optimum use is the one likely to cause the least harm to the significance of the heritage asset, not just through necessary changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use is not necessarily the most profitable one.'* It is important to consider whether any conflict between the provision of such public benefits and heritage conservation is necessary. Equivalent public benefits may be achievable with less or no harm by alternative design or uses.
35. While there are no detailed alternative schemes on the table, SAVE remains unconvinced that the current scheme is the only solution for the regeneration of Custom House.

CONCLUSION

36. Custom House is a heritage asset of the highest national importance, and derives much of its special significance from being a public building of long standing. As such it is an irreplaceable resource and must be conserved in a manner appropriate to its significance, so that it can be enjoyed for its contribution to the quality of life of existing and future generations. Public access is crucial to the conservation and enhancement of this unique heritage asset.
37. SAVE considers that the degree and sustainability of public access proposed is insufficient in the current plans, and that the extent of the public benefit claimed by the applicant is exaggerated, and not backed up by adequate legal and financial agreements. In SAVE's opinion the degree of harm caused by the proposals outweighs the public benefits from the scheme.

SAVE urges that the current proposals be rejected.

7th October 2021

Author

This statement has been written on behalf of SAVE Britain's Heritage by Alec Forshaw (MRTPI, IHBC). He worked as a town planning, urban designer and conservation officer with the London Borough of Islington from 1975 to 2007. He appeared as an expert witness for SAVE Britain's Heritage at the Public Inquiries on Smithfield Market and the Liverpool Welsh Streets in 2014 and the Anglia Square Norwich PLI in February 2020 and Albert Embankment in December 2020. He lectures, campaigns and acts as a trustee in a volunteer capacity for many heritage organisations, including the Victorian Society, the Twentieth Century Society, the London Historic Buildings Trust, the Churches Conservation Trust, and the Islington Building Preservation Trust.

He is the author of *The Markets of London* (1989), *Smithfield, Past and Present* (2016), *1970s London* (2012), and *New City: Contemporary Architecture in the City of London* (March 2013).

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection to the Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 09:43:37

THIS IS AN EXTERNAL EMAIL

Objection to the Planning Applications 20/00632/LBC and 20/00631/FULMAJ

As a Londoner I object to the destruction of our history by the planned gutting and transforming of Custom House to yet another "luxury" hotel.

It restored and used for cultural use, allowing public access as has been done with Somerset House

This is not in line with the meaningful guardianship owed to a Grade 1 listed building.

**Brendan and Caroline flick
45a Thurloe square
SW7 2SX
London**

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 22:04:55

THIS IS AN EXTERNAL EMAIL

Re: 20/00632/LBC and 20/00631/FULMAJ

I object to the proposal to turn the magnificent Custom House into a private hotel. It should remain a public asset, publicly accessible for use by the general public and not a playground for the wealthy.

Carolyn Clark
46 Chisenhale Road
London
E35QZ

Carolyn Clark
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 08:44:34

THIS IS AN EXTERNAL EMAIL

Dear city of London Corporation

I am writing to object to proposals to proposed redevelopment of Customs House a grade 1 building to another luxury hotel.

The proposals are harmful and cause unnecessary damage to the magnificent architecture. This is a greedy and shortsighted proposal and should be declined. Georgian buildings cannot be replaced and should not be desecrated for short term financial gain.

A luxury hotel is exclusive and is not for the general public or the culture of the city.

The unique building could and should be used as a public space for cultural activity. More thought should be given to protecting distinctive features. You should consult heritage experts who have no financial interest in damaging historic grade 1 buildings.

I ask that you completely reject the luxury hotel proposal.

Carolyn Clewer

12 BURHAN UDDIN HOUSE

COMMERCIAL STREET

E1 6BA

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION - Planning Application references 20/00632/LBC and 20/00631/FULMAJ.
Date: 21 October 2021 14:24:42

THIS IS AN EXTERNAL EMAIL

Hello

I am a resident of Tower Hamlets and regularly spend time at the river close to the location of the Custom House. I am writing to support the advice of your planning officers to object to the proposed development of the Custom House which you will be soon considering.

The Custom House is not just another building but a significant Grade-1 listed historical building in a prominent position in London. There is a long history of it having public access and within the City of London development plan, this site has specific uses specified. It has the potential not just to remain as a significant historic artefact but also to play a key role in the strategic redevelopment of the riverside in this part of London.

Decisions about a site such as this can't be taken lightly but the current proposed development is clearly problematic in a number of ways. For this reason I am objecting to the proposals on the following grounds and would ask you to refuse both the planning and listed building consents:

1. The proposed extensions and changes will cause permanent damage to a heritage asset of the highest national significance there are not any public benefits that outweigh this harm
2. These proposals will prevent the significant level of public access that a building of this nature, in this position, should be achieving. Access would ideally be both to the riverside and quayside in perpetuity and also to some of the key historic spaces in the interior.
3. There will be significant damage to the Georgian interior, in particular offices, which should be preserved for the nation and the views externally will be significantly damaged by the proposed extensions.

This site has the potential, like Somerset House further down the river to be a landmark destination for the public, residents of London and visitors to this beautiful city. Its situation is ideal, within a cultural quarter, to really add to the cultural and heritage experience of this area. However, this proposal will not achieve that. This current proposal will not only cause lasting damage but restrict the benefits its location would afford to members of the public and displays a huge lack of ambition for the potential uses of a site such as this.

I won't revisit the detailed responses that have been already put forward by organisations including Save Britain's Heritage but wanted to put on record that I don't believe this proposal does justice either to the ambitions for the site within various strategic plans nor the appropriate treatment of a grade 1 listed building of significant national importance.

Thanks and best wishes
Charlotte Wassermann
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection to planning application 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 21:06:07

THIS IS AN EXTERNAL EMAIL

Objection to planning application 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Sir or Madam,

Please record my strong objection to the proposed planning application for the old custom house,

This magnificent building should not be developed as proposed. Instead it should be kept in public ownership and developed along the lines of Somerset House, restoring it's unique character and maintaining maximum access to the public, including to the riverfront. London has more than enough luxury hotel accommodation and this fine building should not add to that wasteful use of a valuable public resource.

Please keep me informed of progress with this application including when and where it's future will be considered?

Thanks.

Chris Ashby

14 Bryantwood Road,
London N7 7BE

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 15:25:15

THIS IS AN EXTERNAL EMAIL

OBJECTION

I wish to record objections to Planning Applications 20/00632/LBC and 20/00631/FULMAJ re Custom House on the following grounds:

The planning application comprises an unsympathetic conversion to a luxury hotel that will be destructive to the fabric of the grade I listed building, erasing its meaning and significance. The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

In particular, suites of Georgian offices which are a unique survival will be destroyed and two light-box bars added to the roof, compromising the river frontage.

The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

There is an alternative arrangement: [SAVE Britain's Heritage](#) have prepared an imaginative alternative scheme which takes advantage of the building's spectacular location.

The Long Room should be returned as a space for Londoners and south-facing quayside opened for permanent public access with riverside cafes, restaurants and bars, like a square in Venice.

The obvious precedents of Somerset House and Tate Modern demonstrate how the Custom House could be put successfully to public use again.

Kind regards,

Claire Weiss

5 Lea Hall Road
London E10 7AR

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION: Planning applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 19:02:34

THIS IS AN EXTERNAL EMAIL

Alastair Moss
Chair of Planning & Transportation
The Department of the Built Environment
City of London
Guildhall
London
EC2P2EJ

Dear Mr Moss

I wish to register my concern about the proposed redevelopment of The Customs House to create a hotel.

While I appreciate that this is currently the common, and potentially successful fate of many a fine building (e.g. 10 Trinity Square, Bow Street Magistrates Court and The Old War Office), the situation, architecture and history of The Custom House make it far more deserving of preservation as a public space, with the building being restored and opened up as proposed, for example, by Save Britain's Heritage. This imaginative plan could enhance the area enormously in the same way that Somerset House and Tate Modern have enriched their environs, providing refuge, culture, education and recreation for both city workers and visitors.

I do hope that the City of London Corporation will favour Save Britain's Heritage proposal, and ensure that this distinguished and historically important riverside building is preserved for public use. The alternative, I understand, would include the loss of significant internal architecture, with unsympathetic external alterations and additions, likely creating an environment lacking in soul, as well as being inaccessible, of course, to all but the privileged few.

Yours sincerely

David Couper

Milford Cottage
Portsmouth Road
Milford
Surrey GU85HX
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Application 20/00632/LBC and Planning Application 20/00631
Date: 19 October 2021 15:20:57

THIS IS AN EXTERNAL EMAIL

Sir

OBJECTION

Planning Application 20/00632/LBC

And

Planning Application 20/00631/FULMAJ

As a concerned British citizen I wish to lodge objections to the two Planning Applications listed above on the following grounds:

- 1). The applications make clear the Developer's intentions to create two intrusive and highly visible light box pavilions on the building's roof. I contend that such an addition will destroy the integrity of the frontage which is, in its present state a unique and inspiring sight, a beautiful example of late Georgian and early Victorian public architecture:
- 2) the planned development also admits that its fulfilment will require the complete destruction of the suite of Georgian Offices for which the building is justly famous and which are generally considered to be not only the finest example of their kind in the world but possibly the only remaining complete one. Such a destruction would be an act of architectural vandalism:
- 3) finally, the proposed developments seem to be contrary to the stated objectives of City Plan 2036 particularly its concern that plans should be based on the principle of a "diverse cultural demographic" around "office-led cultural use". It's hard to envisage a development that could be less diverse and more exclusive for this heritage building than the current proposals to which I object.

I hope that these proposals will be refused for they will ruin a beautiful example of our cultural heritage. Instead The Custom House should be put to public use, in the ways exemplified by the development of Somerset House and The Tate Gallery of Modern Art, not only for Londoners but for all citizens of our country and of those lucky enough to visit here.

Name and Address of Objector

David Eade
5 Calgary Place
Leeds
LS7 4LQ

Sent from my iPad

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 17 October 2021 00:46:36

THIS IS AN EXTERNAL EMAIL

RE: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

To Whom It May Concern:

DISGRACEFUL!!!! Selling off of British History and Cultural Monuments to the highest bidder for short-term gain. PLEASE DO NOT AID AND ABET this cheapening and degradation of the London Cityscape already so deformed beyond recognition by characterless modern structures.

Please say NO to the conversion of the beautiful Customs House to a luxury hotel for use by a very limited and likely substantially overseas clientele. This beautiful structure should be preserved and converted to uses that taxpaying British citizens will be able enjoy and appreciate.

Thank you.

David Osborne
Claudia Parola
130 Swan Court Chelsea Manor Street
London SW3 5RU

R C Mathews
83 Earls Hall Ave
Southend on Sea
Essex SS2 6NT

[REDACTED]
[REDACTED]
19 October 2021

The Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
London,
EC2P 2EJ

OBJECTION

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Hello

I write to object to the above applications to turn the historic London Custom House into a hotel.

I joined the staff of HM Customs and Excise (the predecessor of HMRC) in 1969 and spent several years working in this building, in the largely unaltered rooms on the upper floors of the west end of the building (that wing that was not bombed and then rebuilt after WW2.)

The central and western parts of the original building, now nearly 200 years old, are a unique survivor of late Georgian London and the building is surely an icon of the City of London's maritime and trading heritage. The building (and its predecessors) housed the Collector and his staff for the most important and prestigious division of the Customs service – The Port of London. He controlled all of the Officers who were such a presence at all of the docks and quays along the river, together with those working at a network of bonded warehouses and other commercial establishments throughout the city. The Custom House was at the centre of a vast web of revenue control.

What should be the fate of a building that is no longer needed for its original function is unclear. But this is not it. The destruction of such a structure (for the planned conversion is in reality exactly that) would be a tragedy that future London citizens would in due time deplore. As Joni Mitchell's song so aptly expresses it – 'You don't know what you've got 'til it's gone'.

Please don't let that happen.

Yours sincerely

From: [REDACTED]
To: [PLN - Comments](#)
Subject: OBJECTION - Re Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 11:59:25

THIS IS AN EXTERNAL EMAIL

Dear City of London Corporation,

As previous residents of London and as members of the public who appreciate the city and its history, we are writing to express our objection to the proposed redevelopment of the Customs House.

We need to think more creatively about the use of this building, in such a way that it will keep it within the access of the general public and not for the exclusive use of patrons at a luxury hotel.

We also need to look at the building, both externally and internally, as an architectural whole, not merely as a decorative facade with a gutted interior and light box pavilions bars on the roof.

We ask you please to turn down this planning application and allow for a more public development of the building.

(Please see: https://mcusercontent.com/9ea03bb11e3ccc82634488e2b/files/89340061-ef7a-407b-bf18-01a31aab800/2003_SAVE_CUSTOM_HOUSE_6_.pdf)

Thank you.

Sincerely,

Dr C Ashley and Ms E Walker
NR1 3RD

THE CUSTOM HOUSE

Page 130

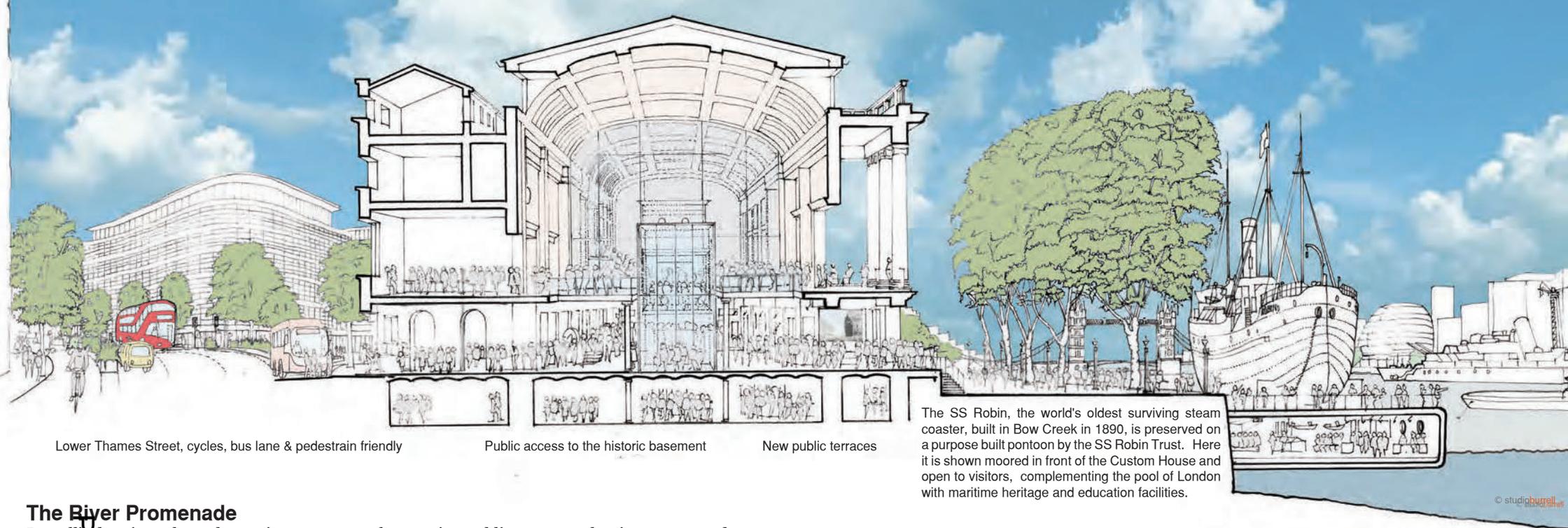
The London Custom House is a forgotten treasure, on a prime site on the Thames with glorious views of the river and Tower Bridge.

The question now before the City Corporation is whether it should become a luxury hotel with limited public access or whether it should have a more public use, especially the magnificent 180 foot Long Room.

The Custom House is zoned for office use and permission for a hotel requires a change of use which the City may be hesitant to give. Circumstances have changed since the Custom House was sold as part of a £370 million job lot of HMRC properties around the UK to an offshore company in Bermuda – a sale that caused considerable merriment among HM customs staff in view of the tax avoidance issues it raised.

SAVE Britain's Heritage has therefore worked with the architect John Burrell to show how this monumental public building, once thronged with people, can have a more public use again. SAVE invites public debate on the future of the Custom House.





The River Promenade

Burrell's drawings show alternative treatments for creating public access to the river promenade.

The ground level on the riverside of the Custom House is 1.5 metres below Lower Thames Street, allowing the creation of a raised terrace (also aiding flood protection), for the ground floor rooms and below, a broad public promenade with trees, seats, kiosks and cafes for the public. The present 'go away' railings can be removed, and the river brought into immediate view. The existing lamp standards can be retained. Further possibilities are to extend the terrace with a pontoon floating on the river and a ramped access to the museum ship SS Robin which is part of the UK's National Historic Fleet and would be a major attraction in this location. Just as Napoleon described St Mark's Square in Venice as the most beautiful salon in Europe so the present desultory Custom House car park can become the loveliest terrace in London, equalling, even surpassing, the great river terrace at Somerset House as it is on the river without traffic in front.

The hidden levels of history

The King's Warehouse is a large multi columned lower hall (now obscured by partitions) opening onto the river terrace.

Looking at options

Inspired by the magical restoration of St Pancras Station, Burrell proposes a cut in the floor of the Long Room rather like the voids opened at St Pancras to allow stairs and lifts to ascend from ground to platform level. These lifts are shown as glass lifts reducing their visual impact. They could be reduced in size if their impact is considered too great. Equally important they could be extended into the basement opening up a whole largely disused level for multiple uses that do not require daylight. The great length of the Long Room may restrict the numbers of hirings to very large events and exhibitions. Therefore, John Burrell proposes an alternative, introducing clear glass screens rising to the ceiling. These would divide the Long Room into a central hallway looking out through to the riverfront and separate grand saloons on either side. These could be used for separate events or a single large event.

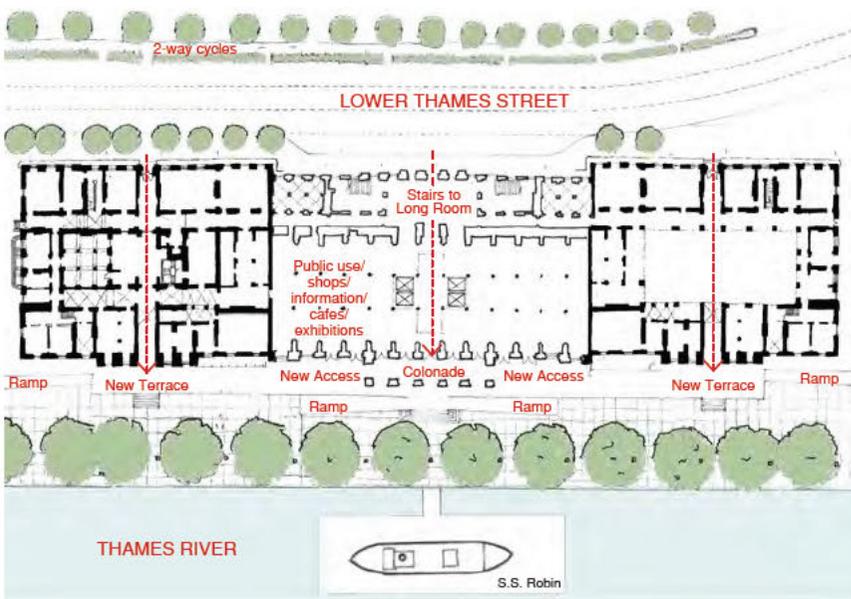
Options for event combinations:

- completely separate events organised by different hosts – say a lecture in one half and a dinner in the other
- a single host wanting a launch and a presentation in one saloon and a dinner in the other
- an art exhibition or auction in one or both saloons.

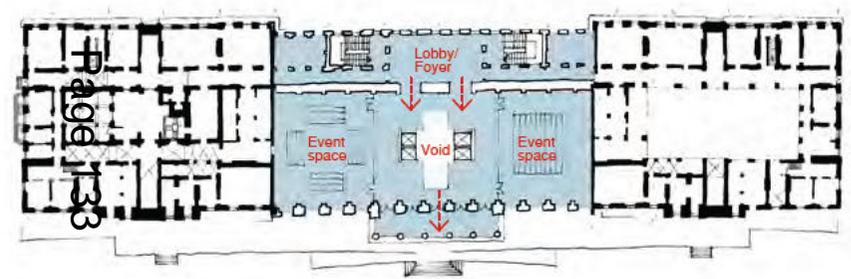
Coincidentally these saloons have similar dimensions to the Wigmore Concert Hall near Oxford Street which has London's finest acoustic.



The Long Room could be made fully accessible with lifts to create two new linked performance/event spaces with access to the external terrace under the portico.



Ground Floor - Quay Side Level



First Floor - Long Room Level © studioburrell

The Office Hub - a new way of working suited to the times

The City Corporation maybe reluctant to change the present office use classification to hotel. A second alternative is to turn the Custom House into a workspace hub with a mix of lettable office and studio spaces. The east end of the Custom House was rebuilt as modern office space after World War II bombing and can be reconfigured as open plan or cellular offices.

The Western third of the Custom House retains its original layout of larger and smaller offices for customs officers and clerks of varying rank. In the Covid era these provide a degree of containment which would suit many office users. High ceilings, airy corridors and large sash windows also provide excellent ventilation with fresh air.



SAVE sets out alternative strategies - a sparkling mix of uses

An adventurous transformation - forgotten splendour transformed for public use.

The Art Gallery

Around the world collectors are looking for large and unusual spaces to display their art treasures, both historic and modern. Examples of new Galleries in historic buildings are legion – **the Saatchi Gallery** in Chelsea Barracks, **the Boros Gallery (a)** of contemporary art in a World War II bunker in Berlin; **the Ullens Centre for Contemporary Art** in a 1950s state owned former munitions factory in Beijing (**798 Art District**).

An inspiring parallel is to be found in the **Hauser & Wirth Gallery** in Zurich **(b)**, installed in the former Lowenbrau Brewery, a building of similar dimensions to the London Custom House. Long, tall spaces are well suited to gallery use, e.g. Liverpool’s purpose designed **Lady Lever Gallery (c)** and the repurposed **Les Abattoirs Museum of Modern and Contemporary Art** in Toulouse **(d)**.

SAVE argues that arts and gallery use can transform the City of London’s arts offer. A large-scale art gallery can be available to both artists and collectors and to commercial art galleries. Christie’s and Sotheby’s could hold previews of sales in the Long Room.

This is not just a pipe dream. By exhibiting in the City, salerooms and galleries would be bringing the art to the highest concentration of potential buyers in the world. Every financial institution in the Square Mile would be in walking distance of the Custom House. With its magnificent riverside position and river terrace the Custom House can be a “must visit” arts venue nearly every week of the year.

There are also opportunities for outdoor exhibitions of sculpture like the brilliantly successful giant horse’s head (Still Water) by Nic Fiddian-Green at Marble Arch which has become a destination in itself.



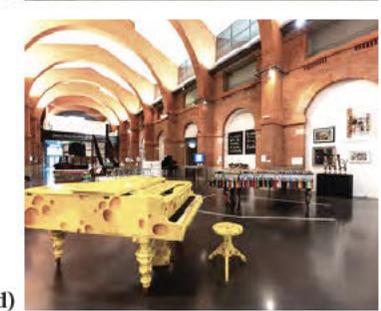
(a)



(b)



(c)



(d)

From: PlnComments@cityoflondon.gov.uk
To: [PLN - Comments](#)
Subject: Comments for Planning Application 20/00632/LBC
Date: 17 October 2021 14:05:59

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 2:05 PM on 17 Oct 2021 from Miss Eileen Spencer.

Application Summary

Address: Custom House 20 Lower Thames Street & River Wall,
Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office to a hotel with ground floor internal north/south public route (sui generis), ground floor museum (Use Class F1 (c)), flexible ground floor and rooftop retail/restaurant/bar floorspace and public viewing terrace (Use Classes E and Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Use Class E) and new riverfront public realm including:
External works: i.) removal of railings around existing riverside carpark, ii) demolition and re-building behind the retained facade of the 1960s East Block iii.) demolition of 1960s East Block roof and alteration of West Block roof to erect 2 x two storey extensions; iv.) demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block (south elevation); v.) alterations to and raising of the flood defence wall; vi) facade alterations and associated works to create a first floor terrace on the Centre Block (south elevation) and reinstated door and new ramped access to West Block (west elevation); vii) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street viii.) associated works to the river wall ix) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) removal of 1990s glazed stair core and parapets, roofing over and reconfiguration of West Block courtyard, to include new service core and other works; ii) demolition and alteration of some existing walls and ceilings and erection of new across all floors in the West and Centre Blocks. |cr|

Case Officer: Jessica Robinson

[Click for further information](#)

Customer Details

Name: Miss Eileen Spencer

Email: [REDACTED]

Address: 63 Broseley Grove Sydenham London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Other

Comments: I object to the Customs House being developed as described. I believe it should be used in a similar manner to Somerset House and that the riverwalk way should not be blocked from public use.

E L I Z A B E T H H I L L I A R D

30 Braithwaite House Bunhill Row London EC1Y 8NE.

telephone: + [REDACTED]

To: The Department of the Built Environment

Sent by email to: PLNComments@cityoflondon.gov.uk

Copied to: Alastair Moss, Chair of Planning & Transportation Committee

([REDACTED])

On: Sunday 17th October 2021

OBJECTION

Dear Madam,

I write to you re Planning Applications 20/00632/LBC and 20/00631/FULMAJ concerning development of the Custom House in the City of London.

I am a Freeman of the City of London and a local resident living in EC1. I often walk along the river and pass the City's old Custom House, a national and heritage asset, and I **object in the strongest possible terms** to these planning applications which will **vandalise** the fine interiors of this historic building, and will **take it out of public use**, for financial gain to commercial developers and hoteliers, when there is not only clear and outstanding precedent for it to remain in public use (vide Somerset House and Tate Modern), but also an imaginative alternative scheme available for its development by SAVE Britain's Heritage.

The proposed conversion of this architectural gem with unique City history is unsympathetic in the extreme. Its conversion to a luxury hotel would be destructive to the fabric of this Grade 1 listed building, erasing its meaning and significance. In particular, suites of Georgian offices which are a unique survival will be destroyed and two light-box bars added to the roof, compromising the roofscape and the river frontage. The only benefit of the proposed conversion would be to the offshore property developer based in the Bermuda tax haven which leases the building.

The alternative SAVE Britain's Heritage scheme is sympathetic to the interior and makes the most of the Custom House's spectacular riverside location, returning the magnificent Long Room as a space for Londoners and creating a south-facing quayside open to permanent public access with riverside cafés, restaurants and bars, like a piazza in Venice.

The City of London has a rich history as one of the world's great trading ports, of which the Custom House is not only a symbol but a unique physical legacy. To grant these planning applications would be to squander one of the City's and Great Britain's historic assets, throwing it to greedy commercial interests who clearly (from the details of this application) are hostile to the architectural entity which is the Custom House and its history. I urge you to resist their siren call and reject these applications, instead returning the building to public use with a sympathetic engagement with its outstanding history and architecture, and its stunning location, to the benefit of Londoners, the City and the country.

I am yours faithfully
Elizabeth Hilliard.

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Objection
Date: 20 October 2021 00:36:15

THIS IS AN EXTERNAL EMAIL

To the City of London Corporation

OBJECTION

To Planning Applications 20/00632/LBC and 20/00631/FULMAJ

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel. I strongly object, believing it should be put back to public use for all Londoners and visitors.

The proposal is undoubtedly a contradiction in the City of London's policy outlined in the **City Plan 2036**, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

An exclusive, luxury hotel will destroy suites of Georgian offices that are a unique survival from this building's long historic past that connects it to a British Literary Giant, Geoffrey Chaucer, who once worked in the customs industry there.

The very idea of '*light box pavilions*' as bars on the roof is an insult to a standing memorial of British trade and commerce once marking London as a world beating destination and business centre. The public has a right to visit and enjoy this building and be proud of the culture that produced such trade and the grand building that survives today.

It also looks very hypocritical, flying the Union Jack whilst leasing off a heritage site in a most unpatriotic manner. At least now keep the character of the building and allow public access for education and cultural appreciation. The arts could do with a boost, so keep London thriving, preserve this building and build back better.

H Street
From the family of Simon Street, the King's Weigher from 1430-1450 (circa)
Cornmount
Talgarreg
Ceredigion, Wales

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 10:12:00

THIS IS AN EXTERNAL EMAIL

Dear Alastair and all involved in the redevelopment of the Custom House,

This is an important and historic building whose long hall and other rooms need to be preserved in a way that gives this building back to London as well as earning the owners revenue.

I would like to object to this proposal as yet again, one of our historic and important buildings is being destroyed to make a hotel. There are so many other ways of changing and reissuing the purpose of this amazing building that I would like to see what other options are available.

With kind regards,

Emma

Emma Parker

Tel: [REDACTED]

From: [REDACTED]
To: [REDACTED]; [PLN - Comments](#)
Subject: Objection to Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 00:06:02

THIS IS AN EXTERNAL EMAIL

Dear All concerned,

It is with shock I received the news of proposed plans to sell off Custom House. Surely, a jewel in our nations cultural and economic history.

As a building it stands as if brick by brick made of British History.

The continuing erosion of public cultural life which contributes heavily to the disillusionment of many of our people has to stop.

Let's consult publically on how to create a place here for us all - Perhaps similar in concept to Somerset House?

A luxury hotel makes nobody proud.

Please urgently reconsider.

Concerned Westminster resident.

From: [REDACTED]
To: [REDACTED]; [PLN - Comments](#)
Subject: OBJECTION - Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 13:15:19

THIS IS AN EXTERNAL EMAIL

I object to the above mentioned application.

This practice is deplorable: a building of such heritage, designed by Wren and Grade I listed, should NOT so easily be disfigured for commercial gain in so turning yet another historical building into a soulless one!

Why are you so intent in destroying London's heritage? Financial gain is not always the answer and when it comes to heritage and the preservation AND conservation of London's treasures, you should think these paramount!

The building should be for everyone to access and use.

I look forward to hearing from you

Regards

Erminia Yardley

[REDACTED]
[REDACTED]

--

Erminia Yardley

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION. Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 12:07:25

THIS IS AN EXTERNAL EMAIL

The proposed redevelopment of this Grade I historic building & conversion into another exclusive luxury hotel is at odds with public use for all Londoners.

The City of London's policy (City Plan 2036) gives preference to open heritage spaces of cultural interest such as the unique surviving Georgian office suites, which the commercial development will destroy.

Also the 2 light box pavilions proposed roof bars will compromise the principal frontage.

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 18:16:59

THIS IS AN EXTERNAL EMAIL

Dear sir/madam

I wish to object in the strongest possible terms to the proposed redevelopment of Custom House into a luxury hotel.

You may wish to know why someone living in Colchester would have an interest. It is this. I spent several happy years working within Custom House and marvelling at the wonderful Georgian interiors it had to offer, which are unique in my opinion.

It would be an utter tragedy should this in any way be changed for the making of money, and I sincerely hope that the building would be considered the asset that it surely is and preserved so that multitudes of visitors can enjoy what it has to offer. I can see no reason why it shouldn't be a very successful tourist attraction, especially considering it's closeness to several other world renowned tourist spots within easy walking distance.

My name and address:

Mrs Gail Farrow
9 Wyndham Close
COLCHESTER CO2 8UY

Yours Sincerely

Gail FARROW

From: [REDACTED]
To: [REDACTED]; [PLN - Comments](#)
Subject: OBJECTION - Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 22:48:34

THIS IS AN EXTERNAL EMAIL

Hi there,

I am objecting to the development of customs house based on following points.

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

Gavin Reeve

Tylers Cottage, Weston Street
East Chinnock, Somerset BA22 9EJ
United Kingdom

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION. Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 10:34:19

THIS IS AN EXTERNAL EMAIL

Dear Planning Council,

Creation of yet another hotel and the continuing anonymising of the City of London is hardly what the City really needs.

The 18th century Grade 1 Custom House - striking in appearance and rich in history - is important beyond the City, actually to the rest of the country. Much, much better use can be made of this fine building in ways that it's commercialisation as a hotel, with however many stars or industry endorsements, cannot and never will.

The exclusiveness of a quality hotel seems to be at variance with the City of London's own 'City Plan 2036' in which the goal is, I understand, to open heritage spaces to a wider cultural demographic. It is on this basis that I wish to express my objection to the proposed use of the culturally significant Custom House as a hotel.

Yours sincerely

Gordon Shiach

4 Kirkland Court
Station Road
Kinross
KY13 8UG

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 18 October 2021 11:55:35

THIS IS AN EXTERNAL EMAIL

Planning Application 20/00632/LBC and 20/00631/FULMAJ

I strongly object to the proposed redevelopment of the 18th century Custom House, and wish for my views to be taken into consideration at the upcoming decision meeting on 26 October. London should be proud of it's heritage and reputation as one of the great capitals of the world, and buildings such as this should be kept and made into a place that enhances London's history - there are any number of hotels in London, but only one Custom House. ALL proposed developments like this one (and Brick Lane for that matter) should be dismissed out of hand.

Regards, Graham

Graham Bennett
5 Waverley Close
Odiham
Hants
RG29 1AT

From: [REDACTED]
To: [PLN - Comments](#); [REDACTED]
Subject: OBJECTION to Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 19 October 2021 21:04:31

THIS IS AN EXTERNAL EMAIL

To whom it may concern,

I wish to object to Planning Applications 20/00632/LBC and 20/00631/FULMAJ

The proposed redevelopment of the Customs House would destroy or otherwise jeopardise much of the historic interior of this important London building, including the magnificent long room overlooking the Thames. This room is significant to London's mercantile and cultural history, and should not merely be protected, but made publicly accessible, not destroyed.

The City of London Corporation must ensure that this handsome building be restored and converted to cultural use with public access, as at Somerset House in the Strand.

Yours truly,
Iain Chambers
16 Louisa Gardens, London E1 4NG

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Objection
Date: 20 October 2021 12:16:38

THIS IS AN EXTERNAL EMAIL

Re Planning Applications 20/00632/LBC and 20/00631/FULMAJ

It seems criminal to me that the Custom House between Lower Thames Street and the River Thames is to be transformed into what will no doubt be a very expensive hotel.

There is a lot of history in that place and to rip out the historic innards of the building would be such a sad thing to do.

I am sure that given its position on the River Thames, there would be scope for a much more sympathetic development that would still comfortably pay its way. It is a great tourist area and should be open and available for all.

I worked in the building for about 14 years and have a great fondness for it.

regards

Ian Press
8 Pattern Bush Close
Brantham
Manningtree
Essex CO11 1RT

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 16:08:18

THIS IS AN EXTERNAL EMAIL

The Custom House is Grade 1 listed and is a prominent and significant building fronting the Thames. It was owned by HMRC but is now owned by Cannon Capital, part of Mapeley Steps, an offshore property developers (based in the tax haven of Bermuda) who purchased it a few years ago from HMRC. The company has submitted a planning application for an unsympathetic conversion to a luxury hotel that will be destructive to the fabric of the building, including unique survivals like its Long Room and suites of 19th century offices, which will damage its historical significance. In addition, allowing an exclusive luxury hotel development on this site contradicts the City of London's policy (outlined in the City Plan 2036) to boost office-led cultural use with the aim of opening heritage spaces to a wider cultural demographic.

Please can the planning committee take note that the Sunday Times reported in 2016 that Mapeley Steps was set up to legally avoid tax of £170m on a government deal, and the controversy over this deal has now been reignited (as reported in the Daily Telegraph in March - see below). May I suggest that the planning committee acquaints themselves with this information, please, and takes it into consideration when considering their decision.

<https://www.telegraph.co.uk/business/2021/03/28/custom-house-hotel-makeover-reignite-deal-controversy/>.

The precedents of nearby Somerset House and Tate Modern show how the Custom House could be put successfully to public use again, creating both imaginative and profitable public space. SAVE Britain's Heritage have prepared such an alternative suggestion, in which the Long Room in the building should be kept and south-facing riverside opened for permanent public access with riverside cafes, restaurants and bars.

As a London resident, I strongly object to this planning application, and hope that the Planning Committee will decide in favour of a transparent scheme to benefit London and its residents, respect this part of our heritage and comply with the City Plan.

Sincerely

J.A. Woolf
17 Canfield Gardens
London NW6 3JP

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 17 October 2021 07:58:50

THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam,

Re : Planning Applications 20/00632/LBC & 20/00631/FULMAJ

I used to live in Wapping High St, and therefore I am very familiar with London's riverfront.

I heard that plans are drawn up and permission is being sought to redevelop Customs House into a hotel. A building of such great presence and history deserves NOT to be turned into a hotel, but better it be preserved. With such a great history, the public deserve to see the building in all its glory, allowing public viewing and a reminder of the history of the area over the centuries.

Another luxury hotel is not needed.

Yours faithfully,

Jeremy Brown
12 Mountview Close
London NW11 7HG

Cc Alistair Moss

Sent from a parallel universe

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 18 October 2021 12:32:44

THIS IS AN EXTERNAL EMAIL

REGARDING|:

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I wish to lodge an objection to the above proposals and redevelopment of the Customs House.

This is an important building that should be given over to public use and any destruction of the interior would be a huge loss to the history of London. The destruction of the Georgian office interiors would be an awful loss, and the addition of light box pavilions as bars will cause the frontage to be incredibly unsightly and ruin the character of the building.

The exclusivity of the luxury hotel development contradicts the City of Londons policy as outlined in the City Plan 2036.

This building chronicles Britains famous nautical history that belongs to the nation and should not be destroyed for profit, but preserved for the future.

Best wishes,

Joel Gorf

My postal address is
Flat 18,
The Academy, Highgate Hill,
London
N195NS

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION to Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 16:09:05

THIS IS AN EXTERNAL EMAIL

To whom it may concern

I OBJECT to the above referenced application(s) relating to proposed development of The Custom House London (Lower Thames Street)

As a listed building The London Custom House is part of our National Heritage and should be preserved and restored as a National Asset available to the general public, perhaps as a National museum /cultural asset reflecting the historical significance of the Port of London as a trading centre and gateway to the UK.

John Butler
141 Victoria Rd
Dartmouth
TQ69EF
Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION - planning applications 20/006/32/LBC & 20/00631/FULMAJ
Date: 17 October 2021 12:54:43

THIS IS AN EXTERNAL EMAIL

Dear Sir / Madam,

I am writing to lodge my objections to the above as a Londoner and keen supporter of retaining the little left of London's irreplaceable heritage .

In particular ;

- the proposals would deny any access to the public to this unique heritage building . This is in contradiction to the City of London's own plan . Alternative options providing a public space and access to the Long Room have been prepared but do not appear to have been considered.
- the proposal would mean the destruction of a suite of Grade 1 Georgian offices
- the proposal includes the addition of two " light box " extensions to the roof which would irreplaceably harm the vista from the river.

In conclusion the City of London has over many years continually displayed contempt to the retention of what is left of its architectural heritage and the public's desire to use and access these spaces. The only consideration seems to be profit generation and the ambitions of "big business developers". The path followed is fast leading to a city of poorly repurposed buildings and anonymous over sized glass and steel monoliths creating wind tunnels of unattractive overshadowed streets. You do not appear or want to appreciate that London's main appeal to visitors and residents is the heritage and character which you are hell bent on eradicating .

Yours

Julie Selhep
48 Albert Square
London E15 1HH

Sent from my iPhone

From: PlnComments@cityoflondon.gov.uk
To: [PLN - Comments](#)
Subject: Comments for Planning Application 20/00632/LBC
Date: 17 October 2021 14:09:29

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 2:09 PM on 17 Oct 2021 from Miss Kathleen Spencer.

Application Summary

Address: Custom House 20 Lower Thames Street & River Wall,
Stairs And Crane, Custom House Quay London EC3R 6EE

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office to a hotel with ground floor internal north/south public route (sui generis), ground floor museum (Use Class F1 (c)), flexible ground floor and rooftop retail/restaurant/bar floorspace and public viewing terrace (Use Classes E and Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Use Class E) and new riverfront public realm including:
External works: i.) removal of railings around existing riverside carpark, ii) demolition and re-building behind the retained facade of the 1960s East Block iii.) demolition of 1960s East Block roof and alteration of West Block roof to erect 2 x two storey extensions; iv.) demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block (south elevation); v.) alterations to and raising of the flood defence wall; vi) facade alterations and associated works to create a first floor terrace on the Centre Block (south elevation) and reinstated door and new ramped access to West Block (west elevation); vii) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street viii.) associated works to the river wall ix) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) removal of 1990s glazed stair core and parapets, roofing over and reconfiguration of West Block courtyard, to include new service core and other works; ii) demolition and alteration of some existing walls and ceilings and erection of new across all floors in the West and Centre Blocks. |cr|

Case Officer: Jessica Robinson

[Click for further information](#)

Customer Details

Name: Miss Kathleen Spencer

Email: [REDACTED]

Address: 63 Broseley Grove Sydenham London

Comments Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Reasons for comment: - Other

Comments: I object to the Customs House being re-developed as described. Too many of the old London buildings are being destroyed and redeveloped. Is it really necessary to have yet another luxury hotel in London? The riverside walk should not kept open for public access.

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION to Custom House planning applications
Date: 18 October 2021 10:44:44

THIS IS AN EXTERNAL EMAIL

OBJECTIONS REGARDING: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Planning Department / Alastair,

I am writing to submit my Objections to the above mentioned planning applications as I believe this spectacular Grade I listed building of strong historical significance to British heritage should be preserved for the public / cultural use rather than be privately owned. The proposed works will not only block public from enjoying this building but also destroy original Georgian features, compromise the city skyline with inappropriate roof pavilions and set a precedent for other cultural sites to be bought up and developed by unscrupulous developers.

Kind regards,
Lara Schroder
23 Abinger Place, Lewes, BN7 2QA

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Custom House SAVE IT FOR THE NATION!
Date: 17 October 2021 18:04:16

THIS IS AN EXTERNAL EMAIL

Sirs: we beg of you NOT to grant permission for the Historic Custom House to be turned into an hotel.

Please, save it for the Nation! Far, far too many historic buildings and even entire neighbourhoods (for example, Spitalfields) are threatened by the blight of new development. This building should be, at the very least, preserved intact — we, ourselves, should like to see it as a Museum — so that future generations can see a vital part of England's, and London's, history and heritage.

What use is yet another Hotel, especially in post-pandemic times? Who knows when — or if— the need for new hotels will ever return? Meanwhile, what's done cannot be undone. Your decision will decimate an important part of London's infrastructure for a development of no importance, and probably not even much use.

Please: save the Custom House. Thank you.

Ms. L Burch
25, Maiden Lane
London WC2E 7 NR

Sent from my iPad

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ OBJECTION
Date: 17 October 2021 12:53:05
Attachments: [Screen Shot 2021-10-17 at 12.40.27 PM.png](#)

THIS IS AN EXTERNAL EMAIL

Dear City of London Corporation

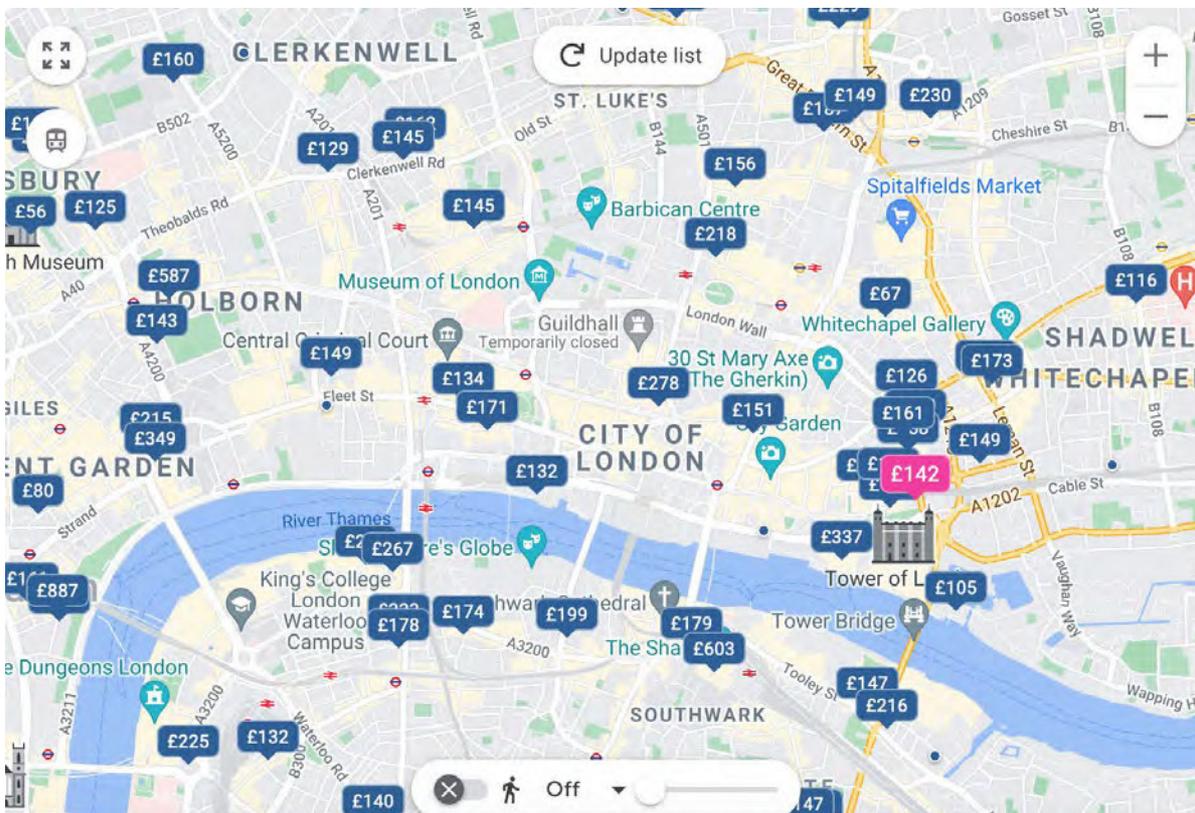
I am writing to object to the above Planning Applications to turn the Customs House into a luxury hotel.

So many office blocks and luxury flats have been built recently demolishing vast areas of old London in the last 20 years and so many luxury hotels already abound close to the Customs House: The Savoy Hotel, Sea Containers House, The Corinthia, The Royal Horseguards, The Waldorf Hilton, for instance, see my attached map, there is no need for another. I hope that you will consider my objection to the scheme and that generations to come will be able to appreciate this building which should be put back into use for all Londoners instead.

The hotel development will destroy a listed Grade 1 Historic building and the design will alter the integral look of the existing building facade. This makes a mockery of the ethos of the listing process and yet another example of the insatiable greed of London property developers.

Yours faithfully

Lucinda Douglas-Menzies
15 Lamb Street
London E1 6EA



From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection - Customs House
Date: 21 October 2021 13:42:03

THIS IS AN EXTERNAL EMAIL

Dear planning team,

Re: Objection to **Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

I strongly object to the conversion of Custom House into a luxury hotel.

In the first instance, it is at odds with the City of London's policy to keep heritage assets open to the wider public, not just those wealthy enough to afford luxury hotels.

And secondly, the loss of historic fabric to a Grade I listed building is totally unnecessary. A hotel would require extensive servicing and subdivision. Grade I status is given to just 2.5% of all listed buildings and therefore such an invasive scheme which includes the removal of such important elements such as the rare surviving Georgian offices is wholly unacceptable. In no way is this scheme 'reversible'.

Whilst there is a option to keep this building in a cultural use for the benefit of London and Londoners, there can be no justification for approving a hotel scheme.

Kind regards,

Maddie Pierson
66 Coldharbour Lane
Bushey
WD23 4NY

From: [REDACTED]
To: [REDACTED] : [PLN - Comments](#)
Subject: OBJECTION
Date: 17 October 2021 07:30:39

THIS IS AN EXTERNAL EMAIL

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Flat 10, Cobalt Building, Bridgewater Square, London EC2Y 8AH .

Dear Sirs

When I walk on the south side of the Thames or visit St Dunstan church nearby I marvel at the wonderful Custom House building. When I realised that there were plans to turn it into another hotel I was horrified; it has such a fascinating past and is integral to London's history. I should very much like to visit the building - the famous long room and little offices branching off - and can't imagine the damage that would be done to it by it becoming a hotel.

I am sure that the local community could use it profitably and the long room would make a splendid games room, in the same way as some country houses had a long gallery in which people could walk and exercise during inclement weather. Art workshops, children's areas, communal spaces for older visitors and possibly somewhere that people could bring their dogs. Restaurant, gallery, theatre, music studios, there are endless interesting possibilities. It could be a joyful place rather than a static hotel.

Please do not allow the hotel plan to go ahead.

Margaret H Gadsden

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection to planning applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 19:42:45

THIS IS AN EXTERNAL EMAIL

Dear sir

I am writing to object to the planning applications submitted for the Custom House building, proposing to convert it into a luxury hotel. I am frankly amazed that such a development to an iconic Grade 1 Listed building is being considered at all, let alone one which will inevitably result in the destruction of some of the buildings unique internal features.

My specific objections are

To the destruction of unique internal features of the building

To the addition of structures for a rooftop bar which will irrevocably change the external aspect and compromise its Listed status.

I also want to refer back to the City of London's own excellent City Plan 2036 which sets out aims which are at odds with this development; the CoL's vision for cultural use by the people of London, supported by office space development seems impossible to reconcile with these plans for yet more hotel space. London does not need more hotel rooms - it needs to preserve and protect its unique heritage so that future visitors will be attracted to come to London (where they will be amply served by the existing accommodation).

i believe that by rejecting this destructive proposal the City of London could be a key promoter of appropriate uses for the Custom House, in keeping with the CoL's record of support to projects enhancing the lives of Londoners.

Yours faithfully

Mark Gorman
151 Capel Road, London E7 0JT

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION to Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 10:28:49

THIS IS AN EXTERNAL EMAIL

I Strongly object to the plan to turn the Custom House into a luxury hotel which would take this important cultural historical building away from Londoners and visitors.
I Strongly support the Save Britain's Heritage's scheme to restore it to public advantage so all people can benefit from it particularly the amazing Long Room and keep it's integrity.

Sincerely

Max Reeves
29 Wheler House
Quaker Street
LONDON E1 6SS

--
[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Custom House
Date: 18 October 2021 21:48:15

THIS IS AN EXTERNAL EMAIL

Dear Sirs, Madames; I write to urge you to reconsider the proposed development of Custom House. As a US citizen we have always looked to Europe for leadership and inspiration on how places should be respected and preserved. Please do not disappoint us! We need your sound leadership now more than ever! Please consider the endless possibilities for that marvelous structure that do not include luxury hotels, etc,. Thank you. Respectfully, Melissa Delano PO Box 1820 Santa Cruz, New Mexico 87567 USA

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 21 October 2021 10:46:45

THIS IS AN EXTERNAL EMAIL

Sirs,

The Customs House
20/00632/LBC. 20/00632/FULMAJ

Do you not think that London has lost enough of its valued old buildings without having to suffer the loss of another?

Yours sincerely,
Michael Jones.

London. N22 8PY

Sent from my iPad

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 13:21:54

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

I object to the planned changes to the Custom House for the following reasons:

- 1) This magnificent grade 1 listed building has played a key part in Britain's heritage as a world-wide maritime nation; it represents an important aspect of Empire, trade and colonialism - a physical manifestation of our "island story." As such the Custom House needs to be open and accessible to all members of the public rather than for the exclusive use of those who can afford luxury hotel rates.
- 2) The City of London has the opportunity to add to the public domain and the glory of London's waterfront and provide an invaluable space for Londoners as with Tate Modern and Somerset House.
- 3) Interior developments for a hotel threaten to destroy the unique features of the Custom House, such as the Long Room - an act of cultural vandalism.
- 4) City Plan 2036 emphasises the priority for creating opportunities for heritage spaces to attract a wider cultural demographic into London's cultural areas. A luxury hotel on the site of the Custom House does not honour this.

Michael O'Leary

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 09:23:16

THIS IS AN EXTERNAL EMAIL

To Whom It May Concern,

I am writing to express in the strongest terms my objection to further destruction of historical buildings in Spitalfields. The consideration of the stunning Grade 1 Historic Custom House being converted into a hotel is ridiculous and another example of money and profits being prioritised over history and culture. Do we really need another hotel at the expense of a piece of our heritage?

I look forward to your response and sincerely hope that objections such as mine are considered seriously, and not just discarded by businessmen keen to make a quick buck.

For the record and purpose of this objection, my address is 28 Grange Road, Elstree, Herts WD6 3LY.

Yours sincerely,

Michelle Rosenberg

Michelle Rosenberg

[REDACTED]
[REDACTED]

Mobile: [REDACTED]

[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 19:35:06

THIS IS AN EXTERNAL EMAIL

Re **Planning Applications 20/00632/LBC and 20/00631/FULMAJ, the proposed conversion of The Custom House into a hotel.**
I strongly object to the proposed works. A grade 1 listed building of such historic significance to London will be lost when repurposed as a just another hotel. There is no interest at all got the nation for this conversion. All the original character of the interior will be destroyed. Abs I believe even much of the facade will be altered. That in itself is scandalous.
Please turn down these applications.
Regards,
Mike Oughton

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 19 October 2021 07:57:39

THIS IS AN EXTERNAL EMAIL

Re: planning application 20/00632/LBC
20/00631/FULMA

City plan 2036 states one of the City of London's ambitions is to open heritage spaces and to attract a wider cultural audience in general to London, yet the plans of the offshore leaseholders of Custom House are in direct opposition to this? This, of course, could be due to the fact they themselves could be classed as the wider cultural audience, unaware of Londons rich cultural heritage, slowly slipping away, so I ask them to please look again.

Unique Georgian offices, with so many stories within their structure, gone forever?

I read of the planned light box pavilions with a sinking heart, I used to live, too, near Blackpool, and remember something similar being mooted. Please, no.

I ask for a complete and sympathetic review of the plans as above.

Yours Sincerely,
Nic Shore
73, Dudley Court
London WC2H 9RH
[REDACTED]

Get [Outlook for Android](#)

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 11:25:06

THIS IS AN EXTERNAL EMAIL

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I wish to lodge an objection to the redevelopment.

D4\!d

96 Thetford Road
NEW MALDEN
KT3 5DZ

Cc to [Chair of Planning & Transportation Committee](#)

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection Custom House (Planning Applications 20/00632/LBC and 20/00631/FULMAJ)
Date: 19 October 2021 16:42:47

THIS IS AN EXTERNAL EMAIL

Dear Planning Committee,

I gather that the owner of Customs House has applied for the change of use of Customs House to a hotel.

As a Londoner living and working in this amazing city I am writing to object to these plans which would allow a change of use and the destruction of such a historical building.

We have enough hotels already , enough! This building belongs to the people. We cannot destroy the Long Room and the elegant offices which was the basis for all Custom Houses architecture around the world . This must not go ahead. The river and the City have already been changed beyond all recognition so we must try and keep this listed building intact and reopened.

It is time to use this building for people working and visiting London - almost like a Somerset House which has been so successful and which my family and I visit regularly.

One suggestion what it is connected to the Monument and Tower Bridge would be marvellous.

Many thanks
Patty and Robert Harper
70 Beauval Road
London SE22 8UQ

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: objection Customs House
Date: 18 October 2021 17:51:04
Attachments: [Screenshot 2021-07-18 at 14.04.00.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I write to object to the proposed plans for the development of The Customs House. This is because the exceptional Grade 1 building would be marred forever by the loss to an hotel.

The internal arrangement of rooms and their adjacent uses would be completely lost . Also the proposed carbuncle glass pavilions would maim the sublimely grand fascia.

While I am objecting to this particular proposal I should also like to say that the idea is a complete destruction of a type of building which the City has great need of.

As the city needs to move to a cultural centre and hub for tourism this jewel of a building should not be lost to the public . Many uses could be devised for the spaces which would be a joy to use as a Londoner as Somerset House is further up river. An imaginative scheme should be devised to enhance this treasure not destroy it.

I would like you ,please, to reject this planning proposal outright,
Thank you for reading my email ,

Yours faithfully,

Paul Dyson

PAUL DYSON DESIGN
85 Blackfriars Road
London SE1 8HA

Telephone
[REDACTED]

www.russianimperiallapidary.com

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 11:58:29

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I wish to object to these applications to redevelop the Customs House as a hotel.

This very important 18th C building needs to be protected and preserved, and used for some cultural purpose. The City Plan 2036 suggests preference for such buildings should be to open their heritage space for such use.

It must not be allowed to be converted to a hotel, with the loss of unique sets of Georgian offices, and the destruction of other wonderful features of this Grade 1 listed building. The proposed plans are tacky, and an unsympathetic conversion.

Regards,

Richard Herbert
Hovells
10 Frogge Street
Ickleton
Cambs
CB10 1SH

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 19 October 2021 22:23:21

THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam,

I object strongly to the proposed development.

London does not need another luxury hotel, and the conversion of the building for this intended use would be a travesty and a sacrilege, given the internal destruction of the original features that the plans entail. As a prestigious building, it should be retained to enhance its character and value as a facility for the public to enjoy, not for wealthy visitors alone, and not to benefit an offshore company with no interest in this valuable part of London's historical heritage for its own sake but simply greedily seeking profit.

We cannot go on destroying our heritage in this way: many parts of London have been irrevocably spoilt by inappropriate developments both internal and external, and on this riverside site the retention and enhancement of the building must be the priority.

Yours faithfully,

Dr Robert Cassels.

24 Duxford Road
Whittlesford
Cambs.
CB22 4ND

[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 18 October 2021 23:00:59

THIS IS AN EXTERNAL EMAIL

To whom it may concern

Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I have been reading about your plans to turn The Custom House into another hotel.

This is a plea from a very average someone who loves buildings to allow a historical building to be restored to its former glory and use so that the magic of London buildings can continue to dazzle the next generations.

We have so much to be proud of in this great city, so much history and beauty. Please don't destroy part of the fabric of this.

Thank you for your consideration
Rochelle Shorrick

[REDACTED]

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION
Date: 17 October 2021 20:01:51

THIS IS AN EXTERNAL EMAIL

Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I object to this planning.

The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

The hotel development will destroy suites of Georgian offices that are a unique survival.

The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

I strongly object to this.

Postcode W128QJ

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection 20/00632/LBC and 20/00631/FULMAJ
Date: 18 October 2021 08:38:01

THIS IS AN EXTERNAL EMAIL

Re: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I strongly object to the current proposals to convert the London Custom House into a hotel.

Customs House is a vital part of London's heritage and our cultural identity. London is already swamped with luxury hotels which are unaffordable for the majority a building of such historic importance deserves to be preserved intact and for public usage.

In addition to the negative historic and cultural impact this development would cause there would also be limited taxpayer returns from the offshore investment company.

Regards

Shirley Pigott

101 Pelham Road, London, SW19 1NX

From: [REDACTED]
To: [PLN - Comments](#); [REDACTED]
Subject: OBJECTION
Date: 17 October 2021 14:31:01

THIS IS AN EXTERNAL EMAIL

Re : **Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

Dear Sir/Madam

I object to the proposed application for turning the custom House into a hotel. London is already losing too much of its old stock and with it, the character that comes from having old buildings with rich period interiors.

the opportunity to create another hotel is surely not dependent on the loss of this historic building.

Yours faithfully.

simon hardy

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 17 October 2021 10:51:21

THIS IS AN EXTERNAL EMAIL

Re : **Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

I am writing to record my objection to the plans to convert the historic Custom House into another Hotel.

Please do not destroy this part of our heritage.

I am in favour of retaining the appearance and structure of the building in a way that is useful whilst retaining its historic essence.

Steve - Sent from my iPad

53 Burwell Road
Leyton
London E10 7QG

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: OBJECTION-Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 09:07:46

THIS IS AN EXTERNAL EMAIL

Dear Sir,

Re: PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel when it should be put back to public use for all Londoners.

- The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

Yours sincerely,

Thomas Rashbrook
45 Carlton Road
Lowestoft
Suffolk
NR33 0 RU

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Subject: PA 20/00632/LBC and 20/00631/FULMAJ
Date: 17 October 2021 13:45:29

THIS IS AN EXTERNAL EMAIL

I strongly object to these applications .

1. They destroy the historic heritage of London's commercial and architectural importance.
2. Additional hotel space is not needed and is inappropriate use of this historic building.
3. The building should be used and retained as a monument to London's past and for the benefit of the population at large.
4. The current planning procedures and those who implement them are not adequate to comprehend the importance of this building on its architectural and historic context.

Timothy Hill
Community Charge payer of London (Camden)
14 Elaine Grove
London NW5 4 QG

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objection
Date: 17 October 2021 19:39:23

THIS IS AN EXTERNAL EMAIL

Applications 20/00632/LBC and 20/00631/FULMAJ

Dear sir/madam,

I object to the customs house redevelopment proposal.

The Custom House should have its rich heritage preserved and not be sold off for yet another soulless hotel development on the site. The plans for a hotel are short sighted and will not benefit the cultural capital of London in the long run.

Please do not commit this atrocity.

**Regards,
Zohra khanam
7 Blondin street
E3 2TR**

Sent from my iPhone

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Planning & Transportation Committee – 26 October 2021

Addendum for Agenda item 5.

Planning application 21/00538/FULEIA 120 Fleet Street London EC4A 2BE

1. Letter of representation from St Bride's Church

A letter has been received from St Bride's Church where they state that the proposed development promises to make a considerable contribution to the regeneration of this area of Fleet Street and highlighting the following concerns:

1. Views of St Bride's Tower and scale of the Proposed Development.
 - a. The letter states that the proposed development would allow the public to appreciate and have better access to St Bride's and would enhance the visibility of the tower and views of St Bride's. However, expresses concern over the scale of the proposed building and its impact on the setting of the Grade I listed Church.
2. Vehicular access and parking provision.
 - a. The letter states that the church requires unimpeded access year-round to hearses, wedding cars, deliveries, contractors and disabled visitors and that St Bride's are supportive of the improvements to permeability and access by foot.
3. Impact of extra traffic and pedestrian visitors in the locality
 - a. The letter raises concerns surrounding the existing road network being adequate to accommodate likely increase in traffic volume that the proposed development would bring.
4. Importance of ongoing liaison
 - a. The letter requests the applicant's commitment to positive and regular dialogue with the local community throughout the application process and into construction.
5. Scheduling of Demolition & Construction works & Noise
 - a. The letter requests that St Bride's specific needs in relation to disruption being minimised during weekday and weekend Church Services is considered and safeguarded.

Officer response: The points raised are addressed in full in the officer report. The full consultation comment is appended to this addendum.

2. Public Comment from Mr Patrick Flynn of Urang Property Management Ltd

A public comment has been received which objects to the proposals on behalf of the leaseholders of Sovereign House, Poppins Court.

The objection relates to concerns relating to the structural integrity of Sovereign House.

Officer response: The points raised are addressed in full in the officer report. The full consultation comment is appended to this addendum.

3. Letter of representation from Castle Baynard Ward Member, Henrika Priest

An objection has been received from Castle Baynard Ward Member and resident of 101 Fleet Street. The email states they are in favour of the development in principle but objects for the following reasons:

1. Size of the proposed development
2. Noise, Vibration & dust
3. Planned use of some of the spaces within the new development

Officer response: The points raised are addressed in full in the officer report. The full consultation comment is appended to this addendum.

4. Letter of representation from the Fleet Street Quarter, a business-led Partnership representing a number of businesses within the area has been received expressing its support for the planning application.

The letter states that the developers have ensured clear communication with the Partnership and they're supportive of the development which celebrates and preserves the rich history of the former Daily Express Building.

The full consultation comment is appended to this addendum.

5. Correction and amendments to conditions

The following condition has been added:

Before any works thereby affected are begun, details of all balustrades to external terrace areas and associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

6. Amendment to S.106 figure following discussions with TfL

A figure referenced in paragraph 536 in relation to Cycle Hire Network Improvements Contribution is incorrect. Following discussions with TfL and based on precedent TfL have agreed that they would accept a 35% contribution. The figure should be:

- Cycle Hire Network Improvements Contribution (£77,000 excl. indexation)

17.10.2021

21/00538/FULEIA: 120 Fleet Street London EC4A 2BE

Dear Kurt Gagen,

Thank you for the invitation to respond to the above application.

We recognise that the proposed development promises to make a considerable contribution to the regeneration of this area of Fleet Street.

As custodians of the Grade I listed building, the setting within which your proposals lie, we would highlight the following concerns:

1. Views of St Bride's Tower and scale of the Proposed Development
2. Vehicular access and parking provision
3. Impact of extra traffic and pedestrian visitors in the locality
4. Importance of ongoing liaison
5. Scheduling of Demolition & Construction works & Noise

Having reviewed the documents made publicly available on the City of London portal, our observations related to these concerns are as follows:

1. Views of St Bride's Tower and scale of the Proposed Development

- 1.1 There is clear benefit in proposals to regenerate 120 Fleet Street. St Bride's welcomes the integration of improved vistas at street level. This will allow the public to appreciate, and better access, St Bride's, alongside provision of public access to the roof terrace which will enhance the visibility of the tower and views of St Bride's.
- 1.2 The scale of the proposed development is, however, vast; St Bride's remains concerned about the scale of the building and its impact on the setting of this Grade I listed church. Whilst views from across London have been analysed to integrate the proposed development within the skyline (albeit at poor resolution as compressed online) there appears little consideration of the more long distance views of the tower from the north, where terraces are their tallest, higher than St Bride's tower itself.
- 1.3 St Bride's seeks assurance that the impact on the setting of our historic church is not compromised, particularly given that the proposals include a parapet height greater than that of the church itself on Fleet Street.

2. Vehicular access & Parking provision

- 2.1 St Bride's is a fully and continually operational and busy church, which requires unimpeded access year-round to hearses, wedding cars, deliveries, contractors and disabled/infirm visitors. Both uninterrupted vehicular access and controlled parking is essential for the Church



ST BRIDE'S CHURCH

to be able to function efficiently and effectively. We require that this be maintained throughout construction and as proposals become operational.

- 2.2 St Bride's remains supportive of improvements to permeability and access by foot locally, but stresses the importance of continued and unincumbered access to the Church by and for hearses, wedding cars, deliveries, contractors and disabled/ infirm visitors at all times.
- 2.3 St Bride's requests that, should the City of London resolve to grant permission for the Proposed Development, continuity of existing vehicular access and parking provision be maintained and ensured by means of Condition to the consent throughout demolition, construction and in perpetuity. This should also be taken into account in the assessment of any subsequent Construction Management, or Travel Management Plans submitted for consideration.

3. Impact of additional traffic and pedestrian visitors in the locality

- 3.1 St Bride's remains concerned to ensure that the City of London should consider, and conclude, that the existing road network is adequate to accommodate the likely increase in traffic volume that the Proposed Development will bring (bearing in mind that Fleet Street is already a major bus and transport route).
- 3.2 The City of London Corporation continue to conduct various consultation exercises on development proposals coming forward in the setting of the church and Fleet Street more broadly. St Bride's is supportive of endeavours to regenerate Fleet Street, but requests that the cumulative impact of increased and/or diverse transport requirements are carefully considered and catered for.
- 3.3 St Bride's requests that both Travel Plans and Construction Management Plans be required as Pre-Commencement Conditions - to be submitted and assessed in advance of demolition and construction activities to safeguard accessibility through the realisation of the Proposed Development in order that the Church can maintain its work and ministry.

4. Importance of ongoing liaison

- 4.1 St Bride's received a Zoom presentation on preliminary plans for cultural spaces within the proposed development at 120 Fleet Street on 14th April 2021.
- 4.2 Further consultation on the impacts of the form and scale of the proposed building remains outstanding. St Bride's welcomes further consultation on proposals, given its scale within its setting, to be assured that impacts have been considered and that any benefits demonstrably outweigh the harm to this Grade I listed building and its setting.
- 4.3 St Bride's seeks the Applicant's commitment to positive and regular dialogue with the local community throughout the application process and into construction, and specifically requests ongoing liaison on key demolition and construction activities should the City of London resolve to grant permission.

5. Scheduling of Demolition & Construction works & Noise

St Bride's Church
Fleet Street
London EC4Y 8AU



ST BRIDE'S CHURCH

- 5.1 St Bride's requests that its own specific needs, particularly in relation to disruption being minimised during weekday and weekend Church Services, be considered and safeguarded.
- 5.2 St Bride's is pleased to note that it has been considered as receptor in the published Environmental Impact Assessment. St Bride's requests that monitoring should be completed at the sensitive receptors for the duration of the works, and that this be secured by Condition.

17.10.21

St Bride's Church
Fleet Street
London EC4Y 8AU



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Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: Demolition of the existing River Court building at 120 Fleet Street, including part demolition of the basement and the erection of a new building comprising two basement levels and ground floor plus 20 upper storeys (93.15m AOD) including retail, commercial, office and service use (Class E). Creation of new pedestrian routes. |cr|Change of use of Daily Express Building from office (Use Class E) to learning and non-residential institutions use (Class F1), retail, flexible learning and non-residential institutions and commercial use (Class E), Alterations to and refurbishment of the existing Grade II* listed Daily Express Building at 120 Fleet Street, including works to detach the building from the River Court with demolition of part of linking floorplate and structure from basement level 01 to level 06, demolition of roof and installation of new roof with associated roof garden, erection of new north facade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new facade and shopfront and associated works.

Case Officer: Kurt Gagen

Customer Details

Name: Mr Patrick Flynn

Address: Urang Property Management Ltd 196 New Kings Road London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I am the property manager of Sovereign House, Poppins Court, EC4A 4AX acting on behalf of the leaseholders. I am concerned about the structural integrity of this building which may be affected by this work. In the event of planning approval being granted, I would be grateful for the assurance that a structural survey will be undertaken before the work commences, and straight after the work is completed.

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Objection | 21/00538/FULEIA - 120 Fleet Street
Date: 19 October 2021 18:36:17

Dear Sirs

I'm writing to submit my representation to the above planning application and have the following comments to make:

Size of the proposed development

While I do support the development of the current River Court building in principle, I do have concerns regarding the size of the proposed new building and its impact on the surrounding areas and the Fleet Street Conservation Area as a whole.

The existing River Court building is currently of proportionate scale to its neighbours. However, the proposed development's substantial increase in size and scale is not sympathetic to the local character and history, including the surrounding built environment, and would make the new building excessively large and vastly over-scaled which would impact on the settings of the existing Daily Express building as well as the adjacent Fleet Street Conservation Area. Moreover, in my view, it would go against the City of London's Local Plan to ensure that a building is appropriate for a setting and the amenities of surrounding buildings and space in a specific area.

I am unclear about the justification for the height of this new building? It will quite simply look out of context and there would be no visual balance between this new development and the surrounding buildings and would not be appropriate to the character of this part of the City – this is not the Eastern cluster.

To mitigate the impact therefore, I would urge the reduction in height of this development, to revise the design to avoid any detrimental impact to the Fleet Street Conservation Area rather than shoehorning this, in its current state, into a space just outside that conservation footprint.

Noise / Vibration / Dust

The Environmental Statement, Volume 1, Chapter 11: Likely Significant Effects and Conclusions, paragraphs 11.8 and 11.9 states that there will be major adverse effects due to the works affecting for example 5 & 6 Poppins Court, 24 & 30 Bride Lane and The Old Bell (95 Fleet Street). Not entirely sure how this can suddenly change to "minor adverse effects" relating to 101 Fleet Street, a Grade II listed residential building so close to Bride Lane? I experienced the building of the current River Court building back in 1997/1998 and can categorically confirm that we experienced major adverse effects in 101 Fleet Street from noise and vibrations from the works at the time so am expecting something similar this time around.

However, it's undeniable that the residents of Sovereign House, 5 Poppins Court, as well as the two small businesses (café and barbers), would have to endure far worse noise and vibrations from this redevelopment during demolition and construction as they are based only around five metres from the site. The current demolition of the building in Stonecutter Street which is around 50 metres from 5 Poppins Court has already resulted in vibrations (currently not a statutory nuisance), but if your home shakes so much that you notice it, then that's not acceptable in my view, statutory or not. Will 5 Poppins Court withstand the vibrations of the

building of the proposed development? To ensure that no damage occurs, I'd strongly recommend that a structural survey is carried out by the developers before and after to ensure the structural stability during the development process.

I have great concerns regarding the impact building this type of new development will have on residents and businesses in Poppins Court given the extreme close proximity. I cannot see how the usual working times with its separate noisy working hours will be enough in this particular scenario given that they are geared towards businesses rather than residents. The City Noise Strategy is meant to mitigate and minimise noise and noise impacts **that could adversely affect health and well-being of City residents**, so I do hope to see a very detailed plan, sensitive to the surroundings, on how this entire project will be carried out over the coming 3-4 years as for most residents in 5 Poppins Court, this is their only home with a mixture of retirees, families and people still working from home.

Planned use of some of the spaces within the new development

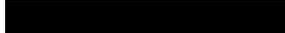
Although the many rooftop green spaces look very welcoming and are an essential part of tomorrow's new office space offer, I'm concerned about the potential use outside office hours, particularly regarding any private events.

It may not be entirely obvious, but Fleet Street and the surrounding areas are quiet during the evening and night, so any noise from private events, bars or restaurants both on the proposed terrace levels as well as street level would carry easily and be in danger of constituting a public nuisance. I would therefore urge the developers to bear in mind how these would be located, their use, as well as ensuring that no outside space is used after 9.00 pm in the evening. so as not to adversely affect local residents.

To re-iterate, I am in favour of the development in principle, but I object to the current height for the reasons given above.

Yours faithfully

Henrika Priest
Resident - Flat 3, 101 Fleet Street
Common Councilman | Castle Baynard Ward

Common Councilman | Castle Baynard Ward


20th October 2021

Planning Application: 21/00538/FULEIA and 21/00524/LBC

120 Fleet Street, EC4A 2BE

Dear Sir or Madam,

On behalf of the Fleet Street Quarter, a business-led Partnership representing a number of businesses within the area, we would like to express our support for the planning application for the proposed development of 120 Fleet Street.

The developers have ensured clear communication with the Partnership, allowing us to share information on the development with local occupiers and stakeholders on the scheme. As well as this, the scheme also demonstrated a clear cultural strategy, in which the Partnership was consulted on separately. The Fleet Street Quarter is committed to championing culture, recognising the necessity of blending culture and commerce to demonstrate innovation and resilience. The rise of the cultural sectors has been accompanied by a renewed sense of value and the role culture in our cities, an increase in foreign direct investment to the UK, and a greater appreciation for the complexity and diversity that characterises thriving districts. Creative production and culture in the City are key catalysts to unlock positive and sustainable growth, international competitiveness and aid a post-pandemic recovery. As well as the FSQ's own cultural ambitions for the area, we feel the proposed developments succeed in supporting the ambitions of The CoL's Draft Local Plan Review 2036 – which sets culture and creativity high on the policy agenda and encourages growth of these sectors.

Widened footways, additional spill-out areas and enhanced evening and night-time cultural activity has been identified in the FSQ's recent Area Based Strategy as a key driver to stimulate much-needed vibrancy and activity to the overall Quarter. 120 Fleet Street demonstrates a commitment to substantial improvements to the public spaces around and within River Court and the Daily Express building, with a new publicly accessible open arcade being created that connects Fleet Street and Shoe Lane. Together with the open arcade, the new active frontages of the building will enhance the pedestrian experience and permeability of the site. Fleet Street by planning definition is considered a '**Principal Shopping Centre (PSC)**', however, results from our recent perception analysis survey indicated that the offering in the area is somewhat limited and lacks variation (this has only been heightened by the pandemic leaving behind a casualty of empty units). The increased permeability through the site provides additional frontage for retail area that, in turn, activates the ground-floor and enhances the pedestrian experience, a catalyst for the revitalisation of Fleet Street and the wider neighbourhood. The proposed scheme stimulates opportunity to create a more mixed-use area, accepting that the public realm and buildings must adapt to post-Covid-19 economic and social trends.

While the FSQ area is rich with intimate and historic networks of streets, lanes, and enclaves, there is a remarkable deficiency of greenery and green spaces with few places to sit and dwell, and no key 'anchor' public space. We very much welcome the schemes proposal for introducing greenery on the publicly accessible roof terrace of the Daily Express Building and on the stepped terraces of the new River Court building. The developers have considered that the increased urban greening across the two buildings will improve not only the local biodiversity, but it will also enhance the outlook for nearby residents and commercial neighbours. The developers also highlight environmental best

practice through a commitment of c.44% carbon reduction for the developments, aiding in global, national, and local sustainability targets.

The Fleet Street Quarter is supportive of the development of 120 Fleet Street. The proposed development celebrates and preserves the rich history of the former Daily Express building, while simultaneously creating a dynamic, exciting, and forward-looking scheme. As stewards for the area, we are confident that the scheme will produce a reimagined (and much needed) enhanced public realm, exciting retail, hospitality, and cultural offering and most importantly, a commitment to environmental best practice – very much aligning with the ambitions of the Partnership and its members.

We hope the City Corporation will approve this application and continue to support the ongoing regeneration and enhancement of the wider Fleet Street area

Kind Regards,

Martha Grekos

Chair, FSQ Public Realm & Environment Steering Group

Fleet Street Quarter Partnership