



## Planning and Transportation Committee

### ADDENDUM 3

**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 - 6)

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

**For Decision**  
(Pages 7 - 10)

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

**John Barradell**  
**Town Clerk and Chief Executive**

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**Planning & Transportation Committee – 26<sup>th</sup> October 2021**

**Addendum for Agenda item 4**

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

Additional late representations

- A. A further 3 letters of representations have been received in objection to the scheme. These are not considered to raise any further matters of objection to those already listed on pages 101-104 of the committee report.

**From:** [REDACTED]  
**Subject:** FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ: OBJECTION  
**Date:** 25 October 2021 10:29:23

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**From:** Andrew Shields [REDACTED]  
**Sent:** 22 October 2021 11:36  
**To:** PLN - Comments <PLNComments@cityoflondon.gov.uk>; Moss, Alastair [REDACTED]  
**Subject:** Planning Applications 20/00632/LBC and 20/00631/FULMAJ: OBJECTION

THIS IS AN EXTERNAL EMAIL

I am writing to lodge an objection to the stated planning applications.

The reasons for my objection are as follows:

1. 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.
2. The hotel development will destroy suites of Georgian offices that are a unique survival.
3. The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage.

In my view, 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.

Andrew Shields  
9 Hartley Road  
London E11 3BL

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ  
**Date:** 25 October 2021 10:29:41

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**From:** David Penney [REDACTED]  
**Sent:** 22 October 2021 11:40  
**To:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Cc:** Moss, Alastair [REDACTED]  
**Subject:** OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ

THIS IS AN EXTERNAL EMAIL

To whom it may concern, I refer to the planning application for the City of London's Custom House to be made into a commercial hotel.

I object in the strongest possible way. To allow this application to proceed would be a terrible waste of what is a unique opportunity for the city of London to create what could, and I believe, should be a world class public space in which Londoners (and visitors) can enjoy both its unique position on the Thames and share in the unique history of the building, its internal spaces, and the history of London's trade with the rest of the world.

What is not needed, either here or indeed anywhere else in London, is yet another hotel that adds nothing to the local environment nor the happiness and wellbeing of the people that would be impacted by such an awful development.

Once gone it can never be replaced, so don't, please don't allow such a wonderful Georgian building to be trashed this way, David Penney.

*antiquarian horologist &  
horological consultant*

[REDACTED]

D Penney  
Grooms Cottage  
Elsenham Hall  
BISHOPS STORTFORD, CM22 6DP

Tel: [REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ: OBJECTION  
**Date:** 25 October 2021 10:30:41

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**From:** [REDACTED]  
**Sent:** 23 October 2021 01:19  
**To:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Cc:** Moss, Alastair [REDACTED]  
**Subject:** Planning Applications 20/00632/LBC and 20/00631/FULMAJ: OBJECTION

THIS IS AN EXTERNAL EMAIL

Dear Sir,

I wish to object to this planning application for the following reasons:

- The Customs House is a historic, Grade 1 listed building and belongs in the public domain, to serve the general public, not a restricted elite.
- Use as a hotel would restrict access by the general public to the area around the building; it is crucial that the public is able to access both the interior of the building and the riverside areas.
- It deserves sympathetic conservation because of its history; not wholesale re-engineering.
- The proposed redevelopment will result in the destruction of Georgian offices which are unique because of their survival for so long.
- The City of London's City Plan 2036 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 add two light box pavilions as bars on the roof which will compromise the principal frontage and damage the skyline and various views of the building, particularly from the south bank of the river.

For all these reasons, I ask you to reject the application.

Yours faithfully

John Francis

26 Woodhall Close, Cuckfield, West Sussex, RH17 5HJ



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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 Mr Fred Rodgers

An email has been received objecting to the proposal from Mr Fred Rodgers of Breton House, Barbican.

The email states:

“You are recommending the destruction of a modern building, one you say was constructed in 2000. According to the planning file, there was an application in August 1999 and approved that December, to vary the existing planning permission at what was then described as a “construction site for offices”. So the River Court Building was completed around 19 years ago and its replacement will be a substantially taller building but a building which will have, according to paragraph 95 of your report to Committee, an increased office GIA of 3,300sq.m over the existing building.

According to figures 2.1 and 2.2, referred to in paragraph 482, the increased embedded carbon of 754 kg CO<sub>2</sub>/m<sup>2</sup> will not achieve a ‘payback’ for Option 3, compared to Option 1, for 24 years and for Option 3, compared to Option 2, for 17 years, although these are transposed in paragraph 482. Unfortunately, there seems to be no indication of the operational carbon emissions from the existing buildings nor the embedded carbon in them. The text accompanying figures 2.1 and 2.2 states:

*The cumulative assessment over the building life shown in Figure 2-2 shows that a payback can be achieved as early as 2044 when Option-3 is compared to the Option 2 and 2049 when compared to Option-1.*

Although whether or not the Circular Economy Statement should offer gratuitous opinions unrelated to the perceived expertise, such as the remainder of the above paragraph set out below, is questionable

*Considering the whole life of the building this makes a strong argument for the redevelopment of the existing River Court building to offer quality and sustainable commercial development.*

It seems that not until paragraph 507 is there any reference to the City of London Climate Action Strategy 2021/2027, which, of course, requires Scopes 1, 2 and 3 to be Net Zero by 2040. However, “payback” against the existing buildings won’t be achieved until 2050 at the earliest on the applicant’s figure, as Option 1 is the existing building with refurbishment adding embedded carbon.

You are recommending the demolition of an 19 year old building and an increase in carbon emissions for 25 years. All this for an additional office GIA of 3,300sq.m – a 5.7 % increase - and something that paragraph 100 completely ignores. There you claim the development “would provide 61,135sq.m GIA of office floorspace”. Where has the existing 57,835sq.m GIA gone?

Finally, there is the lack of objectivity in the Summary to your report, particularly apparent in its final paragraph. As is frequently the case, the effect on adjoining residents is never such that the harm exceeds Local Plan 2015 and/or Draft City Plan 2036 policies but relevant restraining policies are ignored in recommending development.

*There are a small number of major and moderate adverse impacts, on flats at 5 & 6 Poppins Court. Where there are moderate or major adverse impacts, retained levels of VSC and NSL are appropriate to the local context. As such the extent of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. When considered against the wider benefits of the scheme, including the significant public benefits and new routes through the site, these impacts are considered to be acceptable.*

Then there is the final paragraph, which ignores the increased carbon emissions along with the noise and dust pollution of destruction and construction for several years and the harm caused to the adjoining heritage assets:

*Taking all material matters into consideration, officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan the [sic] and other material considerations which weigh against the grant of planning permission. Benefits include: Rejuvenation of the Grade II\* Daily Express Building [this isn't listed according to the report header] as a publicly accessible cultural destination, with complementary uses and a landscaped public roof garden, an improved public realm including new pedestrian routes through the site and increased pavement widening on Fleet Street which improves pedestrian movement and comfort, increased active ground floor frontages providing flexible retail, promotion of active travel through the delivery of a prominently located Cycle House, contributions towards further public realm improvement works to St Bride Street secured through the S278 agreement, use of off-site consolidation centres to minimise vehicle movements, delivery of a Cultural Implementation Strategy which would provide details on how further consultation and delivery plans would be adopted which is secured via a S106 agreement, delivery of an exemplar new office building demonstrating high sustainability credentials, high standards or [sic] architecture and design which provides high quality internal and external environments which embed health and wellbeing through the provision of unique south facing landscaped external amenity terraces for office occupiers.*

Most of these "benefits" could be delivered in any event and certainly without *an exemplar new office building ...* etc. All this seems more like an advertising blurb than an objective opinion of a responsible professional, especially when the Summary will certainly be read by Committee Members.

The lack of objectivity is one ground for my objection to application and my request that the application should be refused. Other grounds are the lasting harm that would be done to the environment for upwards of 25 years if this development goes ahead; another is the unacceptable harm to the adjoining and nearby heritage assets; and, finally, an extra 3,300sq.m GIA is hardly likely to make a pin prick on the surface of the claimed, but unproven, need for additional office accommodation. All of which provides no justification for approving the proposal either pre or post pandemic."



Officer response: The points raised are in response to the officer's report and no new grounds of objection have been raised.

For clarification:

- There would be an increase of 3,300sq.m of office floorspace GIA across the two buildings. This calculation takes into account the current Daily Express Building which currently provides approximately 5,269sq.m of office floor space. The proposals include the change of use of this building to provide for a flexible cultural offer falling into a mix of Class E and F.1. The breakdown of uses and sq.m provided per use is detailed within the officer report. If this building were to retain wholly for office use, the uplift in office floor space would be higher. Additionally, the current building provides 983sq.m of retail floor space, the rest is office. The proposal would provide 1,926sq.m of retail at ground floor level, therefore reducing the uplift of office provision.
- The wider public benefits of the scheme are detailed and listed in the final paragraph of the Summary (Page 6 of the Officer Report) and the assessment of public benefits balancing exercise required by paragraph 202 of the NPPF is demonstrated at paragraphs 522 – 531.
- Clearly any development in the City is going to generate carbon emissions, both operational, supply chain and embodied. We are currently considering how to deal with residual carbon emissions and achieve net zero by 2040 through the Climate Action Strategy.

## 2. Amendment to Paragraph 482

There was an error contained within Paragraph 482, the amendments are highlighted in red:

482. The whole life-cycle carbon emission projections for the 3 options (see figures 2-1 and 2-2 copied from the submitted Circular Economy Statement above) show that option 3 (grey line) would have the **overall** least carbon emissions over a 60-year lifespan while option 1 (blue line) would have the most, due to a very high percentage of operational carbon emissions over this time span. **When considering the Whole Life-Cycle carbon impact, option 3 would achieve paybacks through operational carbon reduction – after 19 years compared to option 2 and after 24 years compared to option 1. The applicants therefore decided to pursue redevelopment option 3.**

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