



Planning Applications Sub-Committee

ADDENDUM PACK

Date: TUESDAY, 9 SEPTEMBER 2025

Time: 10.30 am - or at the rising of the Planning and Transportation Committee, whichever is later

Venue: LIVERY HALL - GUILDHALL

3. **CUSTOM HOUSE, 20 LOWER THAMES STREET AND RIVER WALLS, STAIRS AND CRANE, CUSTOM HOUSE QUAY**

Report of the Chief Planning Officer and Development Director.

(The Addendum relating to the LBC Application can be found on Page 19).

For Decision
(Pages 3 - 24)

4. **SUGAR QUAY JETTY**

Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 25 - 60)

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Committee:	Date:
Planning Application Sub Committee	9 th September 2025
Subject: Custom House, 20 Lower Thames Street and River Wall, Stairs and Crane, Custom House Quay, London, EC3R 6EE. Works to the Custom House and its immediate environs, comprising: Change of use of existing building and riverside car park from office (Use Class Eg(i)) to a hotel-led mixed-use building comprising the following components: 1. Hotel (Use Class C1); 2. Basement spa and health centre (Use Class E(d)); and 3. Ground floor food and beverage, public north/south route, gallery and events spaces (Sui Generis). Together with the alteration, extension, and refurbishment works to the interior and exterior of all three (Western, Central and Eastern) wings of Custom House, to facilitate the redevelopment of the existing building. Introduction of new mechanical/electrical/plumbing services throughout the building to facilitate the proposed use and provision of associated rooftop plant enclosures. The implementation of a public realm scheme to the existing quayside including replacement of southern ground floor external stairs to the Central wing, introduction of a new river terrace including stairs and step free access, new steps and ramp to the site's south-western boundary, revised flood wall and removal of existing vehicle ramp and replacement with vehicle lift. The provision of a site-wide landscaping scheme as well as works to the river wall, works to the flood defence walls, works to the western boundary wall and external works to facilitate servicing, vehicular drop off, cycle and disabled parking and all associated works.	Public
Ward: Billingsgate	For Decision
Registered No: 25/00270/FULMAJ	Registered on: 19 March 2025
Conservation Area: No	Listed Building: Grade I

1. **Amendments to Cover Sheet**

12. OPERATIONAL CARBON EMISSIONS	Total operational carbon emissions: 56,016,128.0kgCO₂e Total operational carbon emissions per square metre: 2683.6CO₂e/m² GIA
14. WHOLE LIFE CYCLE CARBON EMISSIONS	Total whole life-cycle carbon emissions: 19,39,298 kgCO₂e Total whole life-cycle carbon emissions per square meter: 916 kg CO₂e/m² GIA

2. **Additional Representations**

3. One additional letter of support was received and this appended to this addendum.

4. **Amendments and Corrections to the Main Report**

5. Please note the following errata and clarification corrections:
6. Paragraph 135 is amended to remove the strikethrough text in red:

In 1989, the London Port Collection moved to Gravesend and the Investigation Department (now Fraud and Investigation (FIS)) moved into the Custom House following extensive renovations in the early-1990s which included the increased security surrounding the site premises to designs by S K F Architects, including alterations to the internal arrangements (LPA application ref. 5023, approved 10 September 1991). The HMRC war memorial was moved to ~~its present location~~ in the entrance lobby from Somerset House in 2013 (13/00846/LBC). An additional war memorial for Inland Revenue personnel, found in storage, was installed in 2016 (16/00237/LBC).

7. Paragraph 218 is amended to insert the text in red:

The proposals will require the minor loss of historic fabric within the river wall to facilitate drainage across the site, with a low degree of less than substantial harm arising, albeit the harm is considered to have been minimised. The resiting of one of the historic Cranes into the steps is considered to bring heritage benefits in the revealing of its historic use and amplifying the group value and historic functional relationship and use of the river, quayside and

Custom House. As above, the improvements to the setting of these listed structures is considerable, restoring the open character of the riverside and improving the overall architectural quality of their surroundings. The improvements to accessibility along the riverfront is also a key consideration, dramatically increasing the ability to appreciate these features in what is currently and off-putting backland environment. These heritage harms and benefits are given great weight and considered in the full planning balance **section** later in this report.

8. The table in paragraph 471 is amended to read:

Scope	Proposed Development	Benchmark	GLA Benchmark
RICS components	KgCO2/m2	KgCO2/m2	
A1 – A5	272.672	< 850	GLA Benchmark
		< 500	GLA Aspirational
B – C (excluding B6 & B7)	349.460	< 350	GLA Benchmark
		< 300	GLA Aspirational
A – C (excluding B6 & B7; including sequestered carbon)	592.764	< 1200	GLA Benchmark
		< 800	GLA Aspirational
B6 + B7	323.240 2683.6		

9. Paragraph 472 is amended to read:

These figures would result in overall whole life-cycle carbon emissions of ~~49,397,298~~ **70,073,128.0** kgCO2e being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for ~~6,844,922~~ **56,016,128.0**kgCO2e (~~35.3%~~ **79.94%** of the building's whole life-cycle), and the

embodied carbon emissions for ~~12,552,376~~ 14,057,000kgCO₂e (64.7%-20.06% of the building's whole life-cycle carbon). The building's high operational carbon emissions arise from the significant hot water and energy demand typifying hotel use, with constraints to the improvement of the building's envelope further adding to its energy consumption and associated carbon impact. Building services and works to the substructure constitute the greatest contributors to embodied carbon, with significant emissions also arising from concrete, elevators and pipework.

10. The following parts of paragraph 533 are amended to read:

- Local Procurement Strategy (~~Demolition Strategy due prior to Commencement and the Construction Strategy due prior to implementation~~).
- Delivery and Servicing Management Plan (including Consolidation), plus annual review of the plan for the first 5 years following Occupation, to include but not be limited to the following provisions:
 - Delivery trips must take place outside the periods of 07:00–10:00, 12:00–14:00, and 16:00–19:00
 - No servicing with goods vehicles greater than a width of 2.3m or a length of 8m
 - The use of cargo bike deliveries wherever possible
 - Deliveries capped at 28 vehicles, targeting 14 vehicles as part of 50% consolidation, or 196 vehicles per week, whichever shall be fewer.
- City Walkway (~~Declaration~~, Specification, Works and Public Access - 24/7)

11. **Background Papers**

12. The following document was erroneously omitted from the list of Application Documents listed in the Background Papers:

- WLC 3rd Party Verification Report Stage 2, prepared by Waterman Building Services dated August 2025

13. The representations listed in the Background Papers is updated to include:

- Support, Dr Mark Dennis, 28 August 2025

14. **Conditions**

15. The following conditions are to be amended to read:

19	Terrace Hours
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	The terraces, namely Long Room Terrace (First Floor) and Quayside Terrace (External) hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 on the following day, other than in the case of an emergency. The terraces, namely Long Room Terrace (First Floor) and Quayside Terrace (External) hereby permitted shall not be open to Customers between the hours of 21:30 on ones day and 07:30 on the following day. There shall be no set-up or close-down activity of operations on the Long Room Terrace (First Floor) and Quayside Terrace (External) other than between 07:00 and 22:00. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
20	Terrace Music No amplified or other music shall be played on the Long Room Terrace (First Floor) and Quayside Terrace (External). and West Wing Courtyard. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
21	Music No live or recorded music shall be played inside the building that can be heard outside the building. No live or recorded music inside the building shall be played that it is audible at the façade of the nearest residential premises after 21:00. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
22	Windows and Doors The doors and windows to any bar or restaurant on the east frontages eastern elevation facing Water Lane shall be kept closed and only used for access purposes. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3

Detailed Drawings

Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details:

A. Drawn details to 1:10 showing full plans and sections for all proposed new, replacement or adapted stonework, railings, doors, windows, ironmongery cabinetry and/or joinery.

B. Drawn details to 1:20 showing full elevation, plans and sections for the new quayside terrace, ramp and steps and Old Billingsgate ramp and steps specifying railings and technical compliance with Approved Documents K and M and best practice as set out in BS 8300 (Vol 1) unless otherwise agreed in writing by the Local Planning Authority before that element of the works is commenced on site.

C. Drawn details to 1:20 showing full internal elevations, fit-out, plans and sections to: Kings Warehouse including retained and relocated timber screens, Long Room, Robing Room, Entrance Hall from Lower Thames Street, Tidewaiters, Café, Gallery, Typical East Wing Bedroom fit out, Typical West Wing Bedroom Fit-out including accessible rooms within each, Spa and Swimming Pool.

D. Full details of proposed works to Long Room portico, with elevations, plans and sections to 1:20 specifying opening up works, making good, build-up to external areas, details of new flooring, steps, handrails and balustrade.

E. Full window schedule identifying alterations to each individual window identified for repair, replacement or refurbishment, with methodology specified for all replacement glazing, including any double glazing, secondary glazing or any single pane replacement. Typical detailed 1:10 drawings should be provided showing in plan and section all mouldings, sash structure and awning mechanism, including blind box external fixings, structure, colour and materials.

F. Drawn details of all alterations to listed River Wall and Steps including to a scale of 1:10.

G. Details of new roofs and alterations to existing roofs including all plant work, housing, screening, louvres, solar panels, roof lights and making good of fabric following window removal.

H. Details of new lifts and opening up-works to slab and vaults, including section indicating mitigation for views through windows to Lower Thames Street.

	I. Details of alterations to basement level fenestration and associated basement areas on all elevations and/or windows to accommodate plant. J. Details of the integration of any window cleaning equipment and the garaging thereof, plant, flues, fire escapes, health & safety access systems, vermin control and any other excrescences at roof level. K. Details of all new fire rating measures, including in floors, on glazing and doors, and in addition to fire suppression and evacuation infrastructure including sprinklers, sounders, smoke detectors, directional signage and wet and dry risers, smoke extract. To use reasonable endeavours to provide the drawn details at the scales specified under this condition, and to only deviate, where it is appropriate, for the drawing to be drawn at an alternative scale for legibility purposes. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
57	Cycle Parking and Facilities Details of the cycle parking and facilities shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details of the following shall be provided in drawing (at a scale of not less than 1:20): (a) Layout of long and short stay cycle parking (b) The provision of cycle parking shall comprise of long stay cycle parking of 19 long stay spaces and 64 short stay cycle parking spaces. (c) A minimum of 1 space shall accommodate larger/adapted cycles with suitable access and via step free route and associated end of trip facilities and the provision swept path demonstrating that there would be reasonable access for a larger or adapted cycle. (d) Details of the changing facilities, showers (5 including 1 accessible shower) and lockers (18) shall be submitted and approved in writing by the Local Planning Authority. The details hereby approved shall be provided prior to the occupation of the building and maintained throughout the life of the building for the use of occupiers and visitors, without charge to the

	end user, and must remain ancillary to the use of the building and available at all times throughout the life of the building. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy that makes provision for disabled people and encourages greater use of cycles by commuters, and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM10.8, DM16.1, DM 16.3, DM16.4 London Plan policy TS cycling and emerging City Plan policies AT2, AT3 and HL1.
66	Inclusive Access Management Plan Prior to the occupation of the development, an Inclusive Access Management Plan shall be submitted and approved in writing by the Local Planning Authority. All development pursuant to this permission shall be carried out in accordance with the approved documents/drawings, which shall provide specific details on how the development will be constructed, operated and managed for the lifetime of the development to ensure that the highest standard of accessibility is provided. The Inclusive Access Management Plan shall be prepared to demonstrate how an equitable experience will be secured for a range of building users including details of: 1. A 'visual story' for accessing the site to include photographs and easy to read text to be made available on the building operator's website for the lifetime of the development. 2. Details of the approved Travel Plan including details of how employees and all visitors can access the Travel Plan prior to visiting the building. 3. A management protocol for the maintenance and breakdown arrangements for lifts including agreed call out times, advance communication and provision of mitigations including clear signposting of alternative routes. 4. Management practices to deliver the inclusive emergency escape plan including provision of inclusivity awareness training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs). 5. Preview information in at least two formats that shall be made available on the building operator's website and maintained for the lifetime of the development, including but not limited to:

	(a) Arrival at the site from a range of step free destinations including travel distances in metres from step-free points of arrival, resting points and photographs of all building entrances. (b) Protocol for reserving and use of the accessible parking bays on Water Lane and user information including any time restrictions and priorities for use, information about gradients and routes in case of flooding. (c) Details of the Changing Places facilities including location, hours of access, availability of slings and key access (as relevant) (d) Details of accessible room layouts with photos and dimensions as well as location of charging points and doors to connecting rooms (e) Details of animal spend areas in a reasonable proximity of the site including dimensions and type of surface. (f) Details of accessible toilet provision including layouts for wheelchair accessible toilets, ambulant accessible toilets, baby change facilities, universal toilets which are not accessible toilets and measures to support family toilet access. (g) Details and frequency of staff training for emergency evacuation including the issue of GEEP and PEEPs, and frequency of review (h) Details of planting maintenance and frequency of cut-back in proximity of paths and seating and how unwelcome scent and touch can be avoided as to meet the best practice as set out in BSI PAS 6463 and demonstrate how the landscaping proposals will meet PAS 6463 14.1.10 with regard to species type, placing and maintenance (i) Information about all assistive technology associated with the development including any loan/hire of assistive equipment for hotel guests (j) Other inclusive facilities as relevant which may include room for reflection/ multi faith prayer room, Quiet Room or family room. (k) Details of the step free route to the basement spa and health centre REASON: To ensure that the development will be accessible to the greatest range of people in accordance with London Plan D5 and the following policy of the Local Plan: DM10.8. These details are required prior to occupation in order that the building's management supports an equitable access to the building and its services minimising additional effort, separation or special treatment.
78	Tables and Chairs and Activation Areas Plan Prior to occupation of the development, a plan showing the locations of where tables and chairs are to be situated in the quayside and a plan showing the location of the activation areas within the quayside shall be submitted and approved in writing by the Local Planning Authority and should be operated and maintained in accordance with the approved details.

	REASON: In order to protect residential/commercial amenities in the building and surrounding area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
80	City Walkway Provision must be made in connection with the development for the River Thames Path to be provided as City Walkway (pursuant to Part II of the City of London (Various Powers) Act 1967. The City Walkway shall be constructed in accordance with the approved drawings and specifications which are to be submitted to and approved in writing by the Local Planning Authority prior to commencement of relevant works, with such specifications are to include the positions, widths, levels, finishes, handrails and balustrades of the City Walkway, and to include details and specifications of the replacement step-free access ramp proposed at the City Walkway at the Western edge of the site. The construction of the City Walkway shall be completed prior to occupation of the development. REASON: To ensure that facilities are provided for the City Walkway in accordance with the following policy of the Local Plan: DM16.2. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
81	Approved Plans The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: PL-DT-4-01 PL-GA-1-00 PL-GA-1-01 PL-GA-1-02 PL-GA-1-03 PL-GA-1-04 PL-GA-1-05 PL-GA-1-06 PL-SC-1-01 PL-SC-1-02 PL-SC-1-03 CUH-ORM-ZZ-00-DR-A-12150 Rev C01 CUH-ORM-ZZ-01-DR-A-12151 Rev C01 CUH-ORM-ZZ-02-DR-A-12152 Rev C01 CUH-ORM-ZZ-03-DR-A-12153 Rev C01 CUH-ORM-ZZ-04-DR-A-12154 Rev C01 CUH-ORM-ZZ-B1-DR-A-12199 Rev C01 CUH-ORM-ZZ-M1-DR-A-12198 Rev C01 CUH-ORM-ZZ-NO-DR-1-12550 Rev C01

CUH-ORM-ZZ-RF-DR-A-12155 Rev C01
CUH-ORM-ZZ-SO-DR-A-12551 Rev C01
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CUH-ORM-ZZ-00-DR-A-12200 Rev C02
CUH-ORM-ZZ-00-DR-A-12855 Rev C01
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CUH-ORM-ZZ-03-DR-A-12803 Rev C02
CUH-ORM-ZZ-04-DR-A-12804 Rev C02
CUH-ORM-ZZ-B1-DR-A-12809 Rev C02
CUH-ORM-ZZ-B1-DR-A-12840 Rev C01
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CUH-ORM-ZZ-00-DR-A-12002 Rev C01
CUH-ORM-ZZ-00-DR-A-12000 Rev C01
CUH-ORM-ZZ-00-DR-A-12800 Rev C02
CUH-NDY-ZZ-00-DR-M-57001 Rev P03
CUH-NDY-ZZ-XX-DR-M-55001 Rev P03
CUH-NDY-ZZ-ZZ-DR-M-57302 Rev P03
CUH-NDY-ZZ-00-DR-N-70102 Rev P03
CUH-NDY-ZZ-01-DR-N-70104 Rev P03
CUH-NDY-ZZ-02-DR-N-70105 Rev P03
CUH-NDY-ZZ-03-DR-N-70106 Rev P03
CUH-NDY-ZZ-04-DR-N-70107 Rev P03
CUH-NDY-ZZ-B1-DR-N-70101 Rev P03
CUH-NDY-ZZ-B1-DR-N-70501 Rev P02

	CUH-NDY-ZZ-B1-DR-N-70503 Rev P02 CUH-NDY-ZZ-M1-DR-N-70103 Rev P03 CUH-NDY-ZZ-ZZ-DR-N-70401 Rev P03 CUH-NDY-ZZ-ZZ-DR-N-70402 Rev P03 CUH-NDY-ZZ-ZZ-DR-N-70403 Rev P03 REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority
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16. The following conditions are proposed to be added to the Condition Schedule:

82	External Blinds Notwithstanding the provisions of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, the external blinds/shutters shall be not used for the purposes of advertisement, for the lifetime of the development. REASON: In the interests of protecting visual amenity and preserving heritage value, in accordance with Local Plan Policies CS10, CS12, DM3.2, DM10.1, DM12.1, DM12.2 and DM12.3, and emerging City Plan Policies S8, DE2, and DE6.
83	City Walkway There shall be public rights of way and of public access over the City Walkway provided pursuant to Condition 60 for any person to have access thereto on foot and for any person to pass and re-pass thereon on foot as of right (but subject nevertheless to any restrictions which may legitimately from time to time be imposed in relation thereto pursuant to Part II of the City of London (Various Powers) Act 1967. REASON: To ensure the public has access over the City Walkway on this site in accordance with the following policies of the policy of the Local Plan: DM16.2
84	City Walkway Before any existing City Walkway is interrupted a temporary walkway or deviation of the City Walkway must be provided and shall be kept open until such time as the declaration of the permanent replacement City Walkway comes into force. REASON: To ensure satisfactory access to City Walkways by all users in accordance with the following policy of the Local Plan: DM16.2.

85	City Walkway Provision must be made within the development for continuing structural support for the City Walkway(s) in pursuance of Section 10 of the City of London (Various Powers) Act 1967. REASON: To ensure the integrity of the City Walkway in accordance with the following policy of the Local Plan: DM16.2.
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Comments for Planning Application 25/00270/FULMAJ

Application Summary

Application Number: 25/00270/FULMAJ

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

Proposal: Works to the Custom House and its immediate environs, comprising: |cr|Change of use of existing building and riverside car park from office (Use Class Eg(i)) to a hotel-led mixed-use building comprising the following components: 1. Hotel (Use Class C1); 2. Basement spa and health centre (Use Class E(d)); and 3. Ground floor food and beverage, public north/south route, gallery and events spaces (Sui Generis). |cr|Together with the alteration, extension, and refurbishment works to the interior and exterior of all three (Western, Central and Eastern) wings of Custom House, to facilitate the redevelopment of the existing building. Introduction of new mechanical/electrical/plumbing services throughout the building to facilitate the proposed use and provision of associated rooftop plant enclosures. The implementation of a public realm scheme to the existing quayside including replacement of southern ground floor external stairs to the Central wing, introduction of a new river terrace including stairs and step free access, new steps and ramp to the site's south-western boundary, revised flood wall and removal of existing vehicle ramp and replacement with vehicle lift. The provision of a site-wide landscaping scheme as well as works to the river wall, works to the flood defence walls, works to the western boundary wall and external works to facilitate servicing, vehicular drop off, cycle and disabled parking and all associated works.|cr|RE-CONSULTATION DUE TO THE SUBMISSION OF REVISED PLANS.

Case Officer: Georgia McBirney

Customer Details

Name: Dr Mark Dennis

Address: 12 Prospect Row Gillingham

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: The level of consultation for this application is exemplary. This is reflected in the very different and supportive responses to this application.

The current proposal gives a financially and ecologically sustainable commercial future for the building. This will encourage ongoing good maintenance alongside enhanced interpretation and development in the high-end hotel spaces proposed. It is the opposite of the previous proposal by other owners as it not only respects the structure of the building but shows an understanding of how it can support this future. The use of the arrest and restraint area in the basement as a future swimming pool is an indicator of an innovative and sensitive approach.

The proposal embeds the form, function and history of the building into the proposals unlike other suggested heritage based developments which would have erased the building's history (An example of that sterile approach is by Save Britain's Heritage [https://www.savebritainsheritage.org/docs/articles/2003_SAVE_CUSTOM_HOUSE_\(6\).pdf](https://www.savebritainsheritage.org/docs/articles/2003_SAVE_CUSTOM_HOUSE_(6).pdf).) This current planning application is not ashamed of the building's past, rather it seeks to use it to create a way of integrating the structure with the urban landscape and to create a unique environment for visitors and public to engage with this hidden history.

Finally, as a historian of HM Customs & Excise and Curator 1987-91 of the first publicly accessible museum of the Department (situated in the building) and later serving officer on the management team 1995-97 I am acutely aware of how important the building is in the wider history of public buildings, trade and taxation.

The Millennium String of Pearls opening and participation in London Open House reinforced the interest that the public have in the building once they are aware of its significance. The opening of the quayside will cement its relevance to the City and be an important link in the Thames Path restoring public access to the riverfront for the first time in a century.

Committee:	Date:
Planning Applications Sub Committee	9 th September 2025
Subject: Custom House, 20 Lower Thames Street and River Wall, Stairs and Crane, Custom House Quay, London, EC3R 6EE. Internal and External alteration, extension and refurbishment of Custom House (Grade I), and works to the associated River Wall, Stairs and Cranes (Grade II*) for redevelopment into a hotel-led mixed-use building. External works: New public realm scheme to the quayside including removal of railings around riverside car park; replacement of southern ground floor external stairs (Central Wing) for new river terrace with step-free access; works to the southern elevation for improved access; refurbishment and relocation of historic crane; removal of vehicle ramp, construction of new vehicle lift; rebuilding of East Wing steps; new plant on the East Wing roof, provision of PV panels (Central Wing); removal of roof lanterns/rooflights to West Wing; amendments to existing plant room. Repair and refurbishment of window frames and sashes, and introduction of restoration glass. Historic glass reinstated to West Wing Courtyard. Installation of hotel signage, cleaning and repair of elevations, installation of external blinds, lowering of five Long Room window cills and removal of cabinetry to create two new access points to first-floor with railings to portico. Raising of West Wing courtyard floor for new external amenity space, including removal of existing lift and external staircase and the installation of a glazed extension. Introduction of a site-wide landscaping and lighting scheme, retention of historic fixtures, works to the river wall, western boundary wall and construction of new flood defences, servicing areas, vehicle drop off, cycle and disabled parking. Internal works: Installation of mechanical/electrical/plumbing services for hotel use; Hotel rooms with ensuite facilities, minor demolition and works for improved access and servicing; New spa (with pool) and decorative scheme throughout, New lifts in West and Central Wings; Repairs to historic floors, removal of modern raised floors; Refurbishment of existing cabinetry and all other associated internal works.	Public

Ward: Billingsgate	For Decision
Registered No: 25/00271/LBC	Registered on: 19 th March 2025
Conservation Area: No	Listed Building: Grade I

Amendments to the Committee Report

1. Conditions

2. The following conditions are to be amended as follows:

11	Retention and Reuse of Historic Fabric Full details including methodology for the removal, assessment, on-site storage and reinstatement of historic fabric, including: all reused historic glass, lampposts, war memorials, clocks, emblems, lamps, commemorative and brass plaques, lanterns, granite setts, historic crane, all stonework and historic joinery including all doors and timber and glazed panelling to Kings Warehouse. Any intact historic fabric that is damage through removal should be replaced like-for-like from an approved source matching age and construction. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
14	Approved Plans The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: PL-DT-4-01 PL-GA-1-00 PL-GA-1-01 PL-GA-1-02 PL-GA-1-03 PL-GA-1-04 PL-GA-1-05 PL-GA-1-06 PL-SC-1-01 PL-SC-1-02 PL-SC-1-03 CUH-ORM-ZZ-00-DR-A-12150 Rev C01 CUH-ORM-ZZ-01-DR-A-12151 Rev C01

CUH-ORM-ZZ-02-DR-A-12152 Rev C01
CUH-ORM-ZZ-03-DR-A-12153 Rev C01
CUH-ORM-ZZ-04-DR-A-12154 Rev C01
CUH-ORM-ZZ-B1-DR-A-12199 Rev C01
CUH-ORM-ZZ-M1-DR-A-12198 Rev C01
CUH-ORM-ZZ-NO-DR-1-12550 Rev C01
CUH-ORM-ZZ-RF-DR-A-12155 Rev C01
CUH-ORM-ZZ-SO-DR-A-12551 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12350 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12351 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12352 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12353 Rev C01
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CUH-ORM-ZZ-ZZ-DR-A-12357 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12552 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12553 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12554 Rev C01
CUH-ORM-ZZ-00-DR-A-12810 Rev C01
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CUH-ORM-ZZ-00-DR-A-12830 Rev C01
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CUH-ORM-ZZ-00-DR-A-12851 Rev C01
CUH-ORM-ZZ-00-DR-A-12852 Rev C01
CUH-ORM-ZZ-00-DR-A-12853 Rev C01
CUH-ORM-ZZ-01-DR-A-12811 Rev C01
CUH-ORM-ZZ-01-DR-A-12821 Rev C01
CUH-ORM-ZZ-01-DR-A-12831 Rev C01
CUH-ORM-ZZ-02-DR-A-12202 Rev C01
CUH-ORM-ZZ-02-DR-A-12812 Rev C01
CUH-ORM-ZZ-02-DR-A-12822 Rev C01
CUH-ORM-ZZ-02-DR-A-12832 Rev C01
CUH-ORM-ZZ-03-DR-A-12203 Rev C01
CUH-ORM-ZZ-03-DR-A-12813 Rev C01
CUH-ORM-ZZ-03-DR-A-12823 Rev C01
CUH-ORM-ZZ-03-DR-A-12833 Rev C01
CUH-ORM-ZZ-04-DR-A-12204 Rev C01
CUH-ORM-ZZ-04-DR-A-12814 Rev C01
CUH-ORM-ZZ-04-DR-A-12824 Rev C01
CUH-ORM-ZZ-04-DR-A-12834 Rev C01
CUH-ORM-ZZ-B1-DR-A-12249 Rev C01
CUH-ORM-ZZ-B1-DR-A-12819 Rev C01
CUH-ORM-ZZ-B1-DR-A-12828 Rev C01
CUH-ORM-ZZ-B1-DR-A-12839 Rev C01
CUH-ORM-ZZ-M1-DR-A-12248 Rev C01
CUH-ORM-ZZ-M1-DR-A-12827 Rev C01
CUH-ORM-ZZ-M1-DR-A-12838 Rev C01
CUH-ORM-ZZ-NO-DR-A-12600 Rev C01
CUH-ORM-ZZ-NO-DR-A-12701 Rev C01
CUH-ORM-ZZ-RF-DR-A-12205 Rev C01
CUH-ORM-ZZ-SO-DR-A-12601 Rev C01
CUH-ORM-ZZ-SO-DR-A-12700 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12015 Rev C01

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CUH-ORM-ZZ-ZZ-DR-A-12405 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12406 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12407 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12602 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12603 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12604 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12605 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12606 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12702 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12710 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12711 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12720 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12730 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12740 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12741 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12742 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12743 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12744 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12860 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12870 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12880 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12881 Rev C01
CUH-ORM-ZZ-ZZ-DR-A-12890 Rev C01
CUH-ORM-ZZ-B1-DR-A-12829 Rev C02
CUH-ORM-ZZ-00-DR-A-12200 Rev C02
CUH-ORM-ZZ-00-DR-A-12855 Rev C01
CUH-ORM-ZZ-01-DR-A-12201 Rev C02
CUH-ORM-ZZ-01-DR-A-12801 Rev C02
CUH-ORM-ZZ-02-DR-A-12802 Rev C02
CUH-ORM-ZZ-03-DR-A-12803 Rev C02
CUH-ORM-ZZ-04-DR-A-12804 Rev C02
CUH-ORM-ZZ-B1-DR-A-12809 Rev C02
CUH-ORM-ZZ-B1-DR-A-12840 Rev C01
CUH-ORM-ZZ-XX-DR-A-12841 Rev C01
CUH-ORM-ZZ-00-DR-A-12002 Rev C01
CUH-ORM-ZZ-00-DR-A-12000 Rev C01
CUH-ORM-ZZ-00-DR-A-12800 Rev C02
CUH-NDY-ZZ-00-DR-M-57001 Rev P03
CUH-NDY-ZZ-XX-DR-M-55001 Rev P03
CUH-NDY-ZZ-ZZ-DR-M-57302 Rev P03
CUH-NDY-ZZ-00-DR-N-70102 Rev P03
CUH-NDY-ZZ-01-DR-N-70104 Rev P03
CUH-NDY-ZZ-02-DR-N-70105 Rev P03
CUH-NDY-ZZ-03-DR-N-70106 Rev P03
CUH-NDY-ZZ-04-DR-N-70107 Rev P03
CUH-NDY-ZZ-B1-DR-N-70101 Rev P03
CUH-NDY-ZZ-B1-DR-N-70501 Rev P02
CUH-NDY-ZZ-B1-DR-N-70503 Rev P02
CUH-NDY-ZZ-M1-DR-N-70103 Rev P03

	CUH-NDY-ZZ-ZZ-DR-N-70401 Rev P03 CUH-NDY-ZZ-ZZ-DR-N-70402 Rev P03 CUH-NDY-ZZ-ZZ-DR-N-70403 Rev P03 REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority
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Agenda Item 4

ADDENDUM TO ITEM 4 - SUGAR QUAY - PLANNING APPLICATIONS SUB-COMMITTEE 9 SEPTEMBER
2025

Committee:	Date:
Planning Applications Sub Committee	9 September 2025
Subject: Sugar Quay Jetty Use of part of Sugar Quay Jetty for seating and service in association with the restaurant and drinking establishment use (Sui Generis) located on the ground floor of the adjacent Sugar Quay, Lower Thames Street, together with associated works including installation of furniture, and perimeter planters and benches.	Public
Ward: Billingsgate	For Decision
Registered No: 24/01196/FULL	Registered on: 13 November 2024
Conservation Area: N/A	Listed Building: No

Amendments to the Committee Report

Additional Representations

1. Identical representations were submitted by Billingsgate Ward members Alderman Bronek Masojada and Common Councillor Melissa Collett, dated 29th August 2025. They objected to the proposal on three main grounds: increased noise and disturbance from the change of use and associated servicing across the Thames Walkway; loss of public amenity space due to the occupation of part of the jetty; and concerns that the applicant lacks authority to use the space contrary to restrictions in the River Works Licence, which designates the area for private residential amenity only. They consider these issues sufficient to warrant refusal. In contrast, they express support for the Custom House proposals, which they view as better managed and more appropriate for the riverside context. Full copies of the representations are appended to this addendum.
2. Officers note that the issues have been raised by other objectors, and these issues are already assessed in the main body of the report.
3. The River Works Licence referenced is a separate regulatory regime from planning. As set out in the Report (see “Consultation” and “Land Use” sections), the PLA were consulted on this application and raised no objection to the proposed use of the jetty. As set out in the Committee Report (see “Consultation” and “Land Use” sections), the PLA were consulted on this application and raised no objection to the proposed use of the jetty. The 2019 PLA agreement does not alter the planning merits of the proposal or the recommendation before Committee.

Update to Public Comments Pack

4. Objections available online and summarised within the main report were not appended as background papers in error. Please note these representations were already listed in the committee report Appendix A, and have already been considered in the officer’s assessment. These include the following representations:

23/05/2025 - 23:48	Stella L
27/05/2025 - 16:12	Dadds LLP
30/05/2025 - 19:37	Miss Amerjit Grewal
30/05/2025 - 20:35	Mrs Judith Golova
31/05/2025 - 05:21	Mr Ben Lawn
03/06/2025 - 10:43	Mr ROBERT DEELEY
03/06/2025 - 11:39	Ms Martha Grekos
03/06/2025 - 11:42	Ms Martha Grekos
03/06/2025 - 16:12	River Residents Group
03/06/2025 - 19:12	Martha Grekos
04/06/2025 - 06:53	Fiona Lin
06/06/2025 - 17:59	Mr Keith Mansfield
13/06/2025 - 14:14	Dr Marie Shaylor

5. Copies of these objections are now appended to this addendum for completeness.
6. 61 objections have been received in total.

Edits to report text

7. Paragraphs 165 and 166 were incorrect and should be disregarded from the report.

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Comments for Planning Application 24/01196/FULL

Application Summary

Application Number: 24/01196/FULL

Address: Sugar Quay Jetty Sugar Quay Walk London

Proposal: Use of part of Sugar Quay Jetty for seating and service in association with the restaurant and drinking establishment use (Sui Generis) located on the ground floor of the adjacent Sugar Quay, Lower Thames Street, together with associated works including installation of furniture, and perimeter planters and benches. (RECONSULTATION)

Case Officer: Samuel James

Customer Details

Name: Stella L

Address: Sugar Quay 1 Water Lane London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I'm writing to object to the proposed planning application. Since the completion of the apartment building in 2018, the jetty has been open to the public and has become a valued space for residents and the wider community. It would be incredibly disappointing to see it converted into part of a private restaurant. As leaseholders of Sugar Quay, we contribute to the jetty's upkeep, so I believe we should have a voice in how it's used.

As a resident, I'm also strongly against the idea of a restaurant in this space. I have serious concerns about increased noise, waste, odours, pests, and the heavier footfall and delivery traffic it would bring, especially in the evenings. It would really impact the quality of life for those of us living here.

Environment & Planning Department
City of London
PO Box 270
Guildhall
LONDON
EC2P 2EJ

Our Ref: dd/lb/Sugar Quay

Your Ref:

27th May 2025

Email only: plans@cityoflondon.gov.uk

Dear Planning Authority,

Re: Proposed change of use of the Sugar Quay Jetty, Lower Thames Street, London, EC3R 6DQ to Restaurant/Bar seating area serving the existing A3/A4 uses of Ground Floor retail unit of Sugar Quay for up to 169 covers from 08:00 to 22:00 hours: Title no: EGL574894
RECONSULTATION: 24/01196/FULL

We write with reference to the above re-consultation and confirm we act on behalf of a number of residents of Sugar Quay, and we respectfully ask the planning authority to resist this application for a change of use in this residential area.

We write further to our original representation dated 18th January 2025, and attach a further Acoustic Report commissioned in response to the additional information submitted by Quantum Acoustics submitted on 25th April 2025.

Please could you confirm safe receipt of this letter, and if you have any questions please do not hesitate to ask.

Yours faithfully

David Dadds

David Dadds, Barrister
Solicitor-Advocate
DADDS LLP

Dadds Solicitors

Crescent House, 51 High Street, Billericay, Essex CM12 9AX
T: 01277 631811 **F:** 01277 631055 **E:** office@dadds.co.uk
W: www.dadds.co.uk **DX:** 32202 BILLERICAY

Authorised and regulated by the Solicitors Regulation Authority - Dadds LLP (OC358152).
A list of the members is open to inspection at the office.

List of residents:

Marcus Silver apt 22
Annie Le Quesne apt 24
Nigel Le Quesne apt 24
Loren Le Quesne apt 24
Lara Le Quesne apt 24
David Collins apt 36
Karen Collins apt 36
Jacob Collins apt 36
Nathan Collins apt 36
Derek Song apt 46
Antonia Osgood apt 53

Alastair Macaulay apt 63
Ming Zho apt 98
Sylvia Zang apt 98
Gokhan Saygi apt 121
Hatice Muge Saygi apt 121
Pat Goldrick apt 123
Ros Goldrick apt 123
James Prince apt 125
Susan Prince apt 125
Isabella Prince apt 125
India Prince apt 125

Miles Prince apt 125
Neslihan Yilmaz apt 127
Graeme Anderson apt 156
Iain Reitze apt 157
Jackie Alexander apt 157
David Whitehead apt 158
Ms Qilan Fu apt 162
Mikael Olsson apt 164
Katrina Olsson apt 164

ACOUSTIC TECHNICAL NOTE



Reference:	12862.ATN01.RN1.0
Date:	22 May 2025
Project:	Sugar Quay Jetty, London
Subject:	Review of Submitted Information

1. INTRODUCTION

A planning application has been submitted for the use of part of Sugar Quay jetty in connection with a ground floor restaurant premises.

An initial Noise Impact Assessment was submitted by Quantum Acoustics (QA) following which a report was submitted by RBA Acoustics (RBA) which presented an alternative assessment and findings. The RBA report was based upon measurements made on the 1st floor balcony of a residential property at the adjacent Sugar Quay development and demonstrated significantly higher noise impact than suggested in the original QA report.

Subsequent to the above, QA submitted additional information on 25 April 2025 which includes a commentary on the RBA report.

This note seeks to provide the City of London's Environmental Health Team with a brief summary of the key areas of disagreement between RBA and QA. This can then hopefully enable a clearer understanding of the key issues as part of their decision-making process.

2. KEY AREAS OF DISAGREEMENT

The Technical Note produced by QA contains a significant amount of information and response to the RBA report of 20 January 2025.

However, it is considered that the key areas of disagreement between RBA and QA can be simplified to the following:

- Predicted noise levels at façade of residences
- Prevailing background noise levels at residential properties
- Interpretation of relevant standards for determining degree of noise impact

3. PREDICTED FAÇADE LEVELS

The original QA report of 11 November 2024 predicted noise levels at the worst affected parts of the Sugar Quay façade as being 57dBA $L_{eq,1hour}$. This was based upon an assumption that patrons of the premises were using a "Normal to Raised" vocal effort (see para 9.4 of the original QA report).

The RBA analyses was based upon a "Raised" voice and indicated a level of 60dBA $L_{eq,1hour}$ at the Sugar Quay façade.

There is therefore a 3dB difference between the predicted façade levels which is fully explainable when considering the difference in vocal efforts. RBA would contend that it is not uncommon for patrons of restaurants to speak with a raised voice – especially later in the evening when alcohol may have been consumed and patrons are in high spirits.

4. PREVAILING BACKGROUND NOISE LEVELS

The original QA report of 11 November 2024 used a number of noise survey measurements made at the site during July 2024 to determine worst case (i.e. lowest) ambient sound levels $L_{eq,15mins}$.

QA were not able to gain access to the residential properties and so the measurements were made from locations on the riverside walkway.

In response to suggestions in the RBA report that the QA noise measurements reflect “peak” noise levels due to the summertime period over which they were measured, QA have suggested that numbers of pedestrian movements are similar between March and July.

Even if this is correct, and pedestrian movements are in fact similar, it does not necessarily follow that the resultant noise levels are the same. For example, simply looking at pedestrian numbers clearly does not consider any changes to numbers of riverboat movements past the site (for which we would expect summer would inevitably have a higher number of movements and hence noise compared to “off-peak” periods).

In addition, when considering pedestrian movements, the behaviour of humans during a warm summer day is likely to be different to that on a January day. For example, during the summer, people are more likely to congregate in the area for social purposes, as opposed to less clement weather where people may simply be passing along the riverbank on their way to somewhere.

The RBA report was based upon measurements made during January 2025. We were able to gain access to the residences and so our measurements were made on an inset 1st floor balcony. Due to the inevitable reflections from the solid walls making up the inset balcony, we considered that the measurements were likely to overstate the true façade incident noise levels by at least 3dBA.

Comparing the two sets of reported data (as per Table 1 below) clearly demonstrates that the RBA measured data is significantly lower than that used by QA.

Table 1 – Measured Levels

Measurement Period	QA Adopted Data ($L_{Aeq,T}$)	RBA Adopted Data * ($L_{Aeq,T}$)	Level Difference ($L_{Aeq,T}$)
17:00 - 18:00	60	55	5
18:00 - 19:00	61	54	7
19:00 - 20:00	60	53	7
20:00 - 21:00	60	52	8
21:00 - 22:00	59	51	8

* These values are 3dBA lower than the actual measured values to allow for the reflection effects associated with the inset balcony

As can be seen, the QA adopted background noise levels are some 5-8dBA higher than those recorded by RBA.

In their report of 25 April 2025, QA reiterate that they consider their adopted values are more appropriate than those measured by RBA. To justify this, they suggest that the RBA measurement position was to the rear of the inset balcony and hence subject to screening from the key noise sources by the glazed balustrade. This is incorrect however, as the measurement location was not at the rear of the balcony. As the photo below demonstrates, the microphone was at the front of the balcony and was also above the balustrade level.



In our opinion, the RBA values are reflective of noise levels away from the peak (summer) periods. We note the suggestion made by QA that the venue would not be busy during such periods but would expect the premises operator to provide heaters and rugs etc. to the area along with actively promoting the al fresco experience. As such, while we would not expect the premises to be at maximum capacity throughout the non-peak periods, we would expect there to be regular periods where the external space was used at high capacity.

During such periods, the background noise levels used in our assessment would inevitably be more valid than those presented in the QA report.

5. CATEGORISATION OF IMPACT

Sections 3.0 and 4.0 above allow an understanding to be made of the difference between the calculations produced by RBA and those of QA.

However, there is also a difference of opinion in how the predicted noise level change is categorised with Table 2 below providing a simple summary of the approaches taken by the two practices:

Table 2 – Categorisation of Noise

Noise Change (dBA)	RBA Categorisation	QA Categorisation
0	No Impact	No change in sound level
0.1-2.9	Not Significant	Negligible
3.0 – 4.9	Moderate Impact	Minor
5.0 – 9.9	Substantial Impact	Moderate
10.0 and above	Very Substantial Impact	Major

The table below is a direct extract from the Guidelines for Environmental Edition (Version 1.2 dated 2014) as referenced in the QA report.

TABLE 7-12 EFFECT DESCRIPTORS

Very Substantial	Greater than 10 dB LAeq change in sound level perceived at a receptor of great sensitivity to noise
Substantial	Greater than 5 dB LAeq change in sound level at a noise-sensitive receptor; or a 5 to 9.9 dB LAeq change in sound level at a receptor of great sensitivity to noise
Moderate	A 3 to 4.9 dB LAeq change in sound level at a sensitive or highly sensitive noise receptor; or a greater than 5 dB LAeq change in sound level at a receptor of some sensitivity
Slight	A 3 to 4.9 dB LAeq change in sound level at a receptor of some sensitivity
None/Not Significant	Less than 2.9 dB LAeq change in sound level and/or all receptors are of negligible sensitivity to noise or marginal to the zone of influence of the proposals

This table can be broken down into the table below

Table 3 – IEMA Categorisation of Noise

Noise Change [dBA]	Some Sensitivity	Sensitive	Highly Sensitive/ Great Sensitivity
0.1-2.9	Not Significant	No guidance given	No guidance given
3.0 – 4.9	Slight	Moderate	Moderate
5.0 – 9.9	Moderate	Substantial	Substantial
10.0 and above	No guidance given	Substantial	Very Substantial

As is clear from the above, the IEMA guidance does not fully categorise noise for all level changes at each receptor type (the highlighted yellow flags the “gaps” in the guidance).

It can also be seen that it is important to determine the sensitivity of the receptor given the variation in categorisations set-out above. Unfortunately the IEMA document does not specifically define a sensitivity for each use type. However, Section 4.5 of the IEMA guidance does outline the types of receptors which may need to be considered as part of an assessment. These include dwellings, schools and colleges, hospitals, commercial premises, community facilities, retail premises, light industrial sites.

In light of this list, we would suggest it is appropriate to classify a residential receptor as being at least “Sensitive” if not “Highly Sensitive”.

In this regard the categorisations set out in the RBA report would directly correlate with the IEMA guidelines with the exception of the 0.1 to 2.9dBA range where the IEMA document gives no specific guidance (although notably the RBA and QA categorisations both agree that this would be “Not Significant” or “Negligible”.

Table 7-7 of the IEMA document also provides the following generic relationship between noise impact and noise effect:

Slight:

Noise impact can be heard, but does not cause any change in behaviour or attitude, e.g. turning up volume of television; speaking more loudly; closing windows. Can slightly affect the character of the area but not such that there is a perceived change in the quality of life.

Moderate:

Noise impact can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; closing windows. Potential for non-awakening sleep disturbance. Affects the character of the area such that there is a perceived change in the quality of life.

Substantial

Causes a material change in behaviour and/or attitude, e.g. avoiding certain activities during periods of intrusion. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in character of the area.

6. CONCLUSION

Based upon the above comments and looking at the specific/key areas of disagreement between the QA and RBA reports, the outcome can be summarised as follows:

- **Predicted noise levels at façade of residences**

We consider it reasonable to assume that patrons visiting this type of premises are likely to use raised voices. As such, our predicted façade levels remain valid (and are in fact only 3dB higher than those predicted by QA).

- **Prevailing background noise levels at residential properties**

The measurements made by RBA were not (as suggested by QA) subject to any significant screening by the balustrade to the inset balcony. It is expected that the differences reflect the quieter noise levels during non-peak periods (away from the busier summer months).

- **Interpretation of relevant standards for determining degree of noise impact**

The RBA categorisation approach is reflective of that outlined in the relevant IEMA guidelines when considering the residential properties to be “Sensitive”.

In light of the above, we remain of the opinion that the conclusions reached in our January 2025 assessment are correct. Namely, that the noise impact to residents will be ‘Substantial’ and lead to a ‘Significant Adverse Impact’ to the existing residential amenity. Noise associated with patrons in the external dining areas are likely to result in a clearly noticeable noise level change.

It is therefore our opinion that the proposals should therefore not be considered acceptable on noise grounds in their current form.

Comments for Planning Application 24/01196/FULL

Application Summary

Application Number: 24/01196/FULL

Address: Sugar Quay Jetty Sugar Quay Walk London

Proposal: Use of part of Sugar Quay Jetty for seating and service in association with the restaurant and drinking establishment use (Sui Generis) located on the ground floor of the adjacent Sugar Quay, Lower Thames Street, together with associated works including installation of furniture, and perimeter planters and benches. (RECONSULTATION)

Case Officer: Samuel James

Customer Details

Name: Miss Amerjit Grewal

Address: 12 avenue road Harold wood

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I work in the area and use it as a public space. It would be unfair to make it private as the provisions remaining for public use are non-existent

Comments for Planning Application 24/01196/FULL

Application Summary

Application Number: 24/01196/FULL

Address: Sugar Quay Jetty Sugar Quay Walk London

Proposal: Use of part of Sugar Quay Jetty for seating and service in association with the restaurant and drinking establishment use (Sui Generis) located on the ground floor of the adjacent Sugar Quay, Lower Thames Street, together with associated works including installation of furniture, and perimeter planters and benches. (RECONSULTATION)

Case Officer: Samuel James

Customer Details

Name: Mrs Judith Golova

Address: 13 Highland Road Purley

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: This is part of a common walking route for tourists, residents and commuters. Their sense of safety would be eroded.

Comments for Planning Application 24/01196/FULL

Application Summary

Application Number: 24/01196/FULL

Address: Sugar Quay Jetty Sugar Quay Walk London

Proposal: Use of part of Sugar Quay Jetty for seating and service in association with the restaurant and drinking establishment use (Sui Generis) located on the ground floor of the adjacent Sugar Quay, Lower Thames Street, together with associated works including installation of furniture, and perimeter planters and benches. (RECONSULTATION)

Case Officer: Samuel James

Customer Details

Name: Mr Ben Lawn

Address: 2 Hermitage Bridge Cottages Hermitage Bridge WOKING

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This jetty is a lovely space for the public to wander at lunchtime

Comments for Planning Application 24/01196/FULL

Application Summary

Application Number: 24/01196/FULL

Address: Sugar Quay Jetty Sugar Quay Walk London

Proposal: Use of part of Sugar Quay Jetty for seating and service in association with the restaurant and drinking establishment use (Sui Generis) located on the ground floor of the adjacent Sugar Quay, Lower Thames Street, together with associated works including installation of furniture, and perimeter planters and benches. (RECONSULTATION)

Case Officer: Samuel James

Customer Details

Name: Mr ROBERT DEELEY

Address: 81 Pathfield Road LONDON

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This is a loss of public amenity space purely to benefit a private business. There will be a significant loss of benefit to the public who will be discouraged or prevented from accessing the space. It was designed to be open to the public and must remain that way.

Comments for Planning Application 24/01196/FULL

Application Summary

Application Number: 24/01196/FULL

Address: Sugar Quay Jetty Sugar Quay Walk London

Proposal: Use of part of Sugar Quay Jetty for seating and service in association with the restaurant and drinking establishment use (Sui Generis) located on the ground floor of the adjacent Sugar Quay, Lower Thames Street, together with associated works including installation of furniture, and perimeter planters and benches. (RECONSULTATION)

Case Officer: Samuel James

Customer Details

Name: Ms Martha Grekos

Address: MGLC Legal Limited 20 St Andrew Street London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: Please find attached a letter on behalf of my clients, Pat and Ros Goldrick, residents and leaseholders at 123 Sugar Quay, 1 Water Lane, London, EC3R 6AP, who object to the above planning application.

Yours sincerely,
MGLC Legal Limited

Comments for Planning Application 24/01196/FULL

Application Summary

Application Number: 24/01196/FULL

Address: Sugar Quay Jetty Sugar Quay Walk London

Proposal: Use of part of Sugar Quay Jetty for seating and service in association with the restaurant and drinking establishment use (Sui Generis) located on the ground floor of the adjacent Sugar Quay, Lower Thames Street, together with associated works including installation of furniture, and perimeter planters and benches. (RECONSULTATION)

Case Officer: Samuel James

Customer Details

Name: Ms Martha Grekos

Address: 20 St Andrew Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: Please find enclosed a link to the petition that over 1,523 signatories have signed to date against this planning application. See: https://www.change.org/p/prevent-the-conversion-of-public-jetty-to-private-commercial-use?source_location=search They all wish to make sure that the whole area remains open and accessible to all the public.

Yours sincerely,

MGLC Legal Limited



24/01196/FULL | Use of part of Sugar Quay Jetty : OBJECTION: Reasserted

Letter sent as email to Samuel James, Planning Officer, City of London



June 4th 2025

Dear Sirs,

We wish to reassert our former objection, having read the new documents submitted by the applicant.

The applicants are not offering meaningful mitigations to deal with the real issues raised by this application. They are suggesting that any tangible mitigating conditions are kicked into the long grass, to be dealt with later by Licensing or an 'future operator's' Operational Management Plan, something to be negotiated away from the public eye.

There is no acoustic design mitigation: a roof or coverings for example. 'Coverings' could be the subject of another Planning application, the applicants say.

Only a Planning condition about no amplified music, embodied from the start, would save the residents from music as entertainment is unregulated until 11pm. The applicants weave many words around this issue but are not offering a condition to protect the residents. They offer no tangible mitigation to protect residents from the noise made by drinkers: they simply disagree that the raised voices of a large number of drinkers will affect the people who live immediately above.

The applicants' proposal will do nothing but create more anxiety for the residents and more work for more departments in the City of London.

Therefore we stand by our objection.

Michelle Lovric

Vice-Chair, River Residents Group

2 June 2025

C/O: Planning Officer Samuel James
Planning Department
City of London Corporation

BY EMAIL:

[Redacted]

Dear Samuel,

Re: 24/01196/FULL | Use of part of Sugar Quay Jetty for seating and service in association with the restaurant and drinking establishment use (Sui Generis) located on the ground floor of the adjacent Sugar Quay, Lower Thames Street, together with associated works including installation of furniture, and perimeter planters and benches

OBJECTION

On behalf of my clients, Pat and Ros Goldrick, residents and leaseholders at 123 Sugar Quay, 1 Water Lane, London, EC3R 6AP, we object to the above planning application.

The decision for planning permission must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. Below, we state the planning policies this application is contrary to and also material considerations that need to be taken into account.

Planning Policy

1. Contrary to planning policy CS9

This application is contrary to Policy CS9 (Thames and the Riverside) which seeks to “improv[e] access to the river and riverside walk from the rest of the City and the Thames bridges” as well as “maintaining access points to the River Thames foreshore, from both land and water”. The whole jetty which provides access and views to the riverside provides a breathing space from the busy environment which characterises the rest of the City. It is important to balance the river’s functional uses for the movement of people and materials with its role in providing for the recreational needs of residents, workers and visitors. There are a series of strategies which shape the riverside. These include the London Plan, which requires the designation of a Thames Policy Area, whose identification includes consideration of areas and buildings that have historic, archaeological and cultural association with the Thames; the Mayor’s Riverside Strategy, which emphasise links between central London and the Thames riverside to the east; and the Mayor’s Vision for Cycling in London. The City’s Riverside Walk Enhancement Strategy sets out the City’s plans for street scene enhancement along the riverside, and the riverside walk forms part of Natural England’s Thames Path National Trail. The River Thames is designated as a Site of Metropolitan Importance for Nature Conservation.

The applicant is wishing to change this privately owned public space (see further below, section 4) for commercial use in order to simply attract a potential tenant for the restaurant that has been vacant since 2017. This is not an acceptable change of use of open space, especially when it is used by residents, workers and visitors alike in a densely populated and tourist part of the City of London. Providing public access to the jetty (including the private residential part) represents a significant public realm benefit of this kind in this key area of London, which mitigates the impact of the lower soffit on the sense of openness of the Riverside Walk. If this is turned into commercial use, not only is this benefit lost but the above mentioned strategies would be breached as the street scene and views towards the famous landmarks will change and be far denser for all users in that vicinity (including the addition of tall umbrella stands, heaters and substantially reduced open space and views towards the famous landmarks).

2. Contrary to planning policy CS19

This application is contrary to Policy CS19 (Open Spaces and Recreation) which “encourage[s] healthy lifestyles for all the City’s communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity, by: .. protecting existing open space..securing public access..securing additional publicly accessible open space and pedestrian routes.”

Providing enough publicly accessible open space to meet the needs of the daytime population for both recreation and workspace in the densely developed City has long been a challenge, which will be made increasingly difficult by the predicted growth in the workforce. The City of London Open Space Strategy Supplementary Planning Document (SPD) identifies current open spaces and recreational facilities and highlights areas of need. At present, there are 0.06 hectares of publicly accessible open space for a thousand daytime population and it is important that this ratio should not fall as the daytime population grows. Publicly accessible open space provision needs to increase, especially in the eastern sector of the City, where current provision is lowest and the greatest increase in workers, residents and visitors and density of development is expected.

3. Contrary to planning policy DM3.5

This application is also contrary to Policy DM3.5 (Night-time entertainment). Policy DM 3.5 states that: “Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is unacceptable impact on: (i) the amenity of residents and other noise-sensitive uses; (ii) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises. Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.”

The applicant has provided an outline operational management plan that only provides that for 169 covers what the servicing hours will be (9am to 9pm) and what the operating hours will be (8am to 10pm) and that they will use signage at the entrance and exit to state “please leave quickly”. In a letter dated 22 April 2025, the applicant further adds that there will be no live music and no off-licence sales and table service only.

This is not good enough. The applicant has not shown how the amenity of the residents and other noise-sensitive uses have been considered nor are we satisfied that the environmental amenity has also been taken into account. The noise caused by this commercial operation will mean large disturbance to not only residents given the amplification of noise (see further below, section 6), but also there has been no consideration that the public highway (I.e the Riverside Walk) will also be disturbed as waiters will have to cross from the restaurant, either carrying trays down the stairs across the public highway/riverside walk to the jetty or pushing trolleys down the ramps, across the public highway/riverside walk to the jetty - whilst at the same time trying to navigate those who are walking, jogging, on bikes, pushing pushchairs, in wheelchairs and even residents arriving at their homes with luggage/shopping given that one access to the restaurant is via the stairs/slopes that residents and delivery drivers (to the residential block) use. This is not practical given the segregation between the restaurant and the jetty and the area cannot be serviced without putting others at risk.

Lastly, there is likely to be an increase in anti-social behaviour and such premises will put the community at risk of public nuisance. With restaurant furniture being left on the jetty overnight, with intensity of use anti-social behaviour will congregate, impacting residents, given that is where the majority of residential blocks are situated. In addition, there will be more rubbish in that area and nothing has been suggested as to how to abate this.

Material Considerations

4. Private amenity space

The part of the jetty that is proposed to be changed to eating and drinking use is the private part of the jetty that is allocated for private residential use for the residents of Sugar Quay. This is not only seen in planning permission 14/01006/FULMAJ but also the supplementary river works license that is granted between the Crown Estate, the Port of London Authority and the freeholder SQ Holdings Limited dated 16 August 2019 which states as follows:-

Para 13.3 “not to use the area of the jetty reserved for private use other than as private amenity space for the residents of the adjoining residential block known as Sugar Quay and not to hold any events or private parties within this area.”

As such, the residents of Sugar Quay all pay a maintenance fee for the upkeep of the jetty. That private residential use is private publicly accessible land, more typically known as Privately Owned Public Spaces (POPS). This is an area that is owned and maintained privately but are legally required to be open to the public. In essence, this is the “village green” of that area which the applicant now wishes to put in commercial use for eating and drinking.

The Public London Charter, produced by the Mayor of London, applies to public spaces so as to ensure that public spaces remain open and accessible to all Londoners. This is not being applied here and the commercialisation of public spaces comes at the cost of accessibility and affordability. In line with the Good Growth objectives of the London Plan (in particular GG1 Building strong and inclusive communities) public spaces should be places that all Londoners - regardless of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation - can spend time in and enjoy, in comfort and safety both day and night, avoiding separation or segregation. The management of public space significantly affects how it is used and perceived by the public.

5. Petition by users of the jetty

We also enclose with this letter a link to the petition that over 1,523 signatories have signed to date against the change of use of this jetty. See: https://www.change.org/p/prevent-the-conversion-of-public-jetty-to-private-commercial-use?source_location=search They all wish to make sure that the whole area remains open and accessible to all the public.

6. Noise

The noise aspects have been covered in length by the submission and technical reports from Dadds LLP and RBA Acoustics and we do not intend to cover them further here, subject to adding that we agree with the response they have provided: namely, that noise impact to residents will be ‘Substantial’ and lead to a ‘Significant Adverse Impact’ to the existing residential amenity. Residents should not have to not use their balconies and close their windows in order to be able to enjoy their amenity.

Conclusion

We urge you to decline this application for the reasons mentioned above. The development proposals are not acceptable.

With best wishes,

Martha Grekos
Director (Barrister)
MGLC Legal Limited

Prevent the Conversion of Public Jetty to Private Commercial Use



Decision Makers: [London Department of Urban Planning and Development](#) +2



1 Update

The Issue

Our public space – the jetty alongside River Thames, Water Lane, London EC3R 6AL has been a cornerstone of our local community for years. This open and accessible area has enabled partially impaired young people and adults to access and enjoy the area leisurely.

1,523

Verified signatures

Sign this petition

First name

Last name

Email

Greenwich, SE3
United Kingdom

- ☐ Yes! Tell me if this petition wins, and how I can help other relevant petitions
- ☐ No. I don't want to hear about this petition's progress or other relevant petitions.

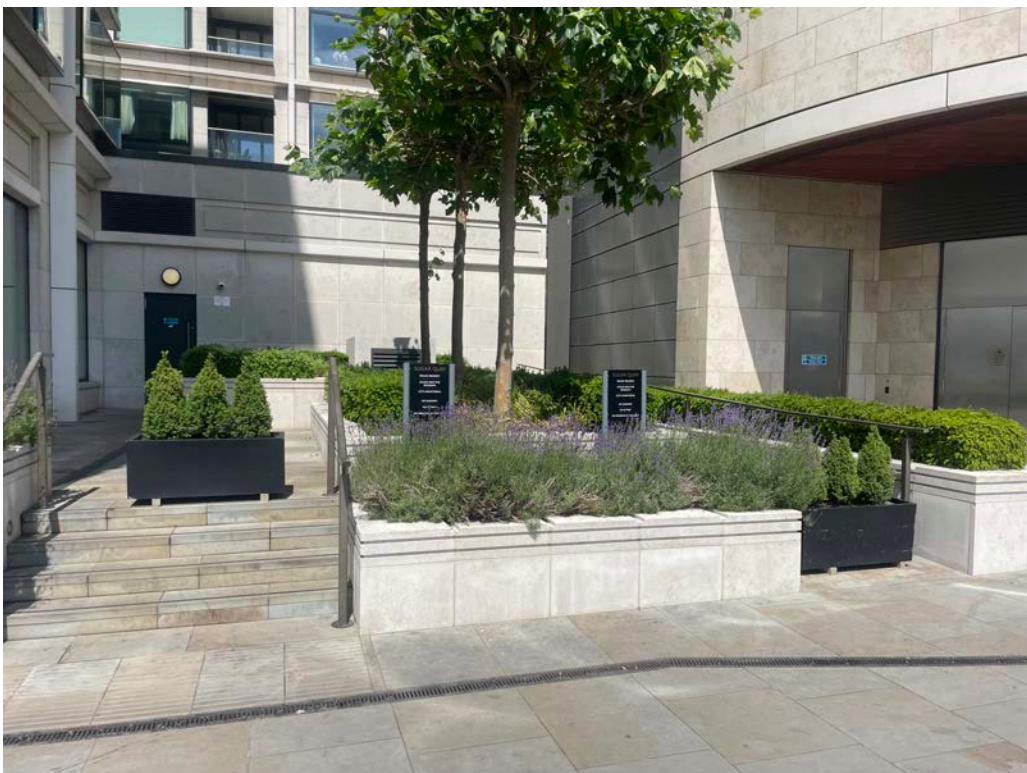
 Sign petition

- ☐ Do not display my name and comment on this petition

We process your information in accordance with our [Privacy Policy](#) and [Terms of Service](#)



Slope/stairs that comes out of the restaurant that waiters will use.

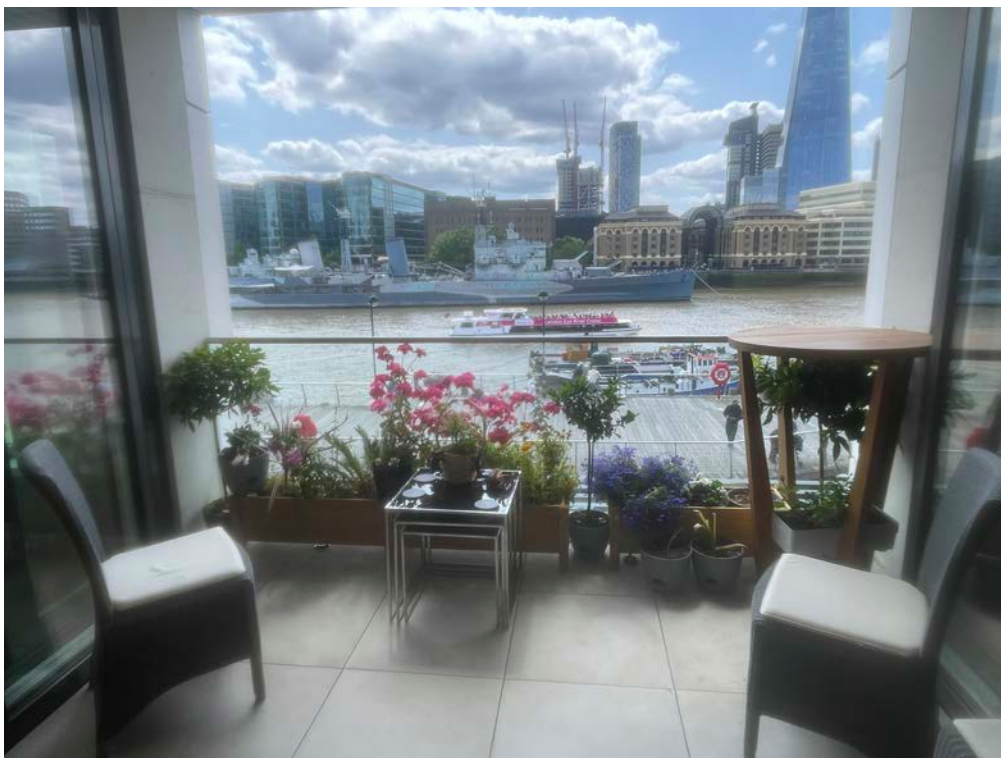




The Riverside Walk (public highway) that waiters will need to cross over, to get to the jetty.



Photos from the balcony of 123 Sugar Quay - noise impact and nuisance will be 'Substantial' and lead to a 'Significant Adverse Impact' to the existing residential amenity.





Use by the public (walkers, runners, wheelchair users, pram pushers, bicycle users etc) will all be restricted in this Privately Owned Public Space. The commercialisation of public space comes at the cost of accessibility and affordability. The management of public space significantly affects how it is used and perceived by the public.

Comments for Planning Application 24/01196/FULL

Application Summary

Application Number: 24/01196/FULL

Address: Sugar Quay Jetty Sugar Quay Walk London

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Case Officer: Samuel James

Customer Details

Name: Fiona Lin

Address: 58 Fenchurch Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Public space and access is precious in London, particularly open space and areas by the Thames. I object to another part of the city and its open areas being taken over for private and commercial use.

On a personal level, I work near the Tower of London, and walking on / stopping at the Sugar Quay Jetty is something I will often do during lunch, improving my wellbeing (and probably productivity). Based on other public comments, this is not an uncommon usage of the space. There are alternative walkways in that area, but none quite as spacious or accessible (for instance, for those in wheelchairs). For comparison, see how cramped and congested the nearby walkway, that west of the Custom House Lower Stairs, can get.

Beyond that, limiting access to the Jetty would be materially detrimental to the tourist experience of the Tower of London and the area nearby it. I went to the Jetty at around 1.50pm on Monday 2 June, and from high-level review, it seemed like most of the people sitting at or walking by the Jetty were leisure visitors to London rather than local workers. There were around 85 people in a 5-minute period on the Jetty, on a random Monday - this is a popular spot to walk by or stop for a drink / snack, and limiting access to it reduces the accessibility of London as a place for all but wealthier visitors.

Whilst the Jetty is busy already (indicated by 85 people being on the Jetty on a Monday afternoon), the proposed change in usage would likely be more disruptive to residents too. Various

residents have already made submissions on this application, but even at a common sense level - I can see how a more fixed drinking and eating establishment would cause more noise, pollution and commotion than people just walking by or having a light picnic, which seems to be the common usage of the Jetty right now.

Comments for Planning Application 24/01196/FULL

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Case Officer: Samuel James

Customer Details

Name: Mr Keith Mansfield

Address: Flat 801, 1 Pepys Street, London EC3N 2NU

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity
- Traffic or Highways

Comment: With friends, as a nearby City resident I actually spend a portion of most days on the jetty at Sugar Quay. We are not alone. All life is there, a wonderful diverse attractive space on the river, to talk, laugh, people watch and admire those wonderful views - the envy of the world. It a space for health and happiness. While we sit and chat there will be people come to exercise, to dance, to read, children to play, and of course many taking photographs. Walking tours come through, and we chat with and welcome visitors to The City. It would be an absolutely massive setback to quality of life in The City if the plan were to go ahead. All of the jetty is well used and well loved, but the main proposed seating area is the busiest part where people exercise, dance and mix freely and happily. The loss of amenity to The City community and the visitors we welcome here, would be catastrophic. But there's more.

I believe it would also be extraordinarily dangerous to turn the jetty into a restaurant space for diners. The Thames Path in this area is a wonderful resource, and therefore incredibly busy. You have runners, sometimes individuals but often groups of 30-50 people running at speed along the Path. You cannot stop people running here - it is the prime spot for wannabe healthy people in the City. You might want to stop the electric bikes and scooters, but of course the Path is not policed regularly so these also come through at speed. It is unimaginable that staff will be wheeling hot dishes, drinks, sharp cutlery across such a continually busy thoroughfare, diving between the traffic. Anyone who approves the plan has to take responsibility for the inevitable accidents that will occur.

And if the solution is to close the Thames Path in the one spot where the whole world wants to travel it, with views of Tower Bridge itself, detracting from the enjoyment of hundreds of thousands of people for the sake of a would-be restaurant, then shame on everyone concerned.

Comments for Planning Application 24/01196/FULL

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Case Officer: Samuel James

Customer Details

Name: Dr Marie Shaylor

Address: [REDACTED]

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I work very close by to the jetty in the city of London and use it every single day. In an already very busy city of London area it is difficult to find space to sit, eat, relax, or socialise outside. There is not enough space for the amount of people present in the area. Losing the jetty would be devastating to me and many other workers like me. The jetty is in regular use by the public and local residents, and is much appreciated by everyone in the area. It is not fair for this essential piece of outdoor public space, which is enjoyed by so many, to (even in part) simply be sold off to the highest bidder, at the detriment of local residents' and workers' mental and physical health. Extremely disappointing this application is even being considered.

Comments for Planning Application 24/01196/FULL

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Case Officer: Samuel James

Customer Details

Name: Mr Bronek Masojada

Address: Members Room West Wing, Guildhall London

Comment Details

Commenter Type: Alderman

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: As members of the Civic team representing Billingsgate Ward we are writing to object to this proposal.

A change of use from a jetty where people may gather but not picnic to restaurant will cause an increase in noise and disturbance in front of the only residential building on the Thames in the Ward of Billingsgate. There will also be substantial serving staff traffic across the Thames Walkway. This is a danger to tourists and others using the walkway. These factors alone should be grounds for refusal.

A result of this change of use is the loss of public amenity space. The jetty itself is described in planning documents as having two areas - one for public use, and the other for the residents of Sugar Quay Warf. In reality there has been no distinction between these two areas, so the occupation of part of the jetty by a restaurant will lead to significant loss of use of the jetty, a detriment to public amenity.

- It is not clear that SQ Holdings has the right to unilaterally "takeover" this space without the agreement of the Sugar Quay leaseholders. At the time of the leaseholder purchases, they were promised use of the jetty space. In a the Deed of Variation dated 11 May 2016 between the City Corporation, Fishmongers and SQ Holdings Limited, there is an enclosed river works license

dated 2015 between the Crown Estate, the Port of London Authority and SQ Holdings, the jetty is specifically shown as two separate spaces on plan BLA-JL-00 - a public area and a private area. The private area in turn has a restriction "not to use the area of the jetty reserved for private use other than as private amenity space and not to hold any events within this area". This has now been made stronger by the most recent river works license dated 16 August 2019. This shows quite clearly that throughout the river works licence process this was intended as amenity space.

We are supportive of the plans for Custom House which which feature a Cultural Café F&B terrace.

Comments for Planning Application 24/01196/FULL

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Case Officer: Samuel James

Customer Details

Name: Mrs Melissa Collett

Address: Member Room West Wing, Guildhall London

Comment Details

Commenter Type: Councillor/Ward Member

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: As members of the Civic team representing Billingsgate Ward we are writing to object to this proposal.

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We are supportive of the plans for Custom House which which feature a Cultural Café F&B terrace.